



BOARD ORDER

IN THE MATTER OF

STATE OF MAINE) APPLICATION FOR
BUREAU OF GENERAL SERVICES) MAINE HAZARDOUS WASTE, SEPTAGE and
JUNIPER RIDGE LANDFILL EXPANSION) SOLID WASTE MANAGEMENT ACT, and
City of Old Town, Town of Alton) NATURAL RESOURCES PROTECTION ACT
Penobscot County, Maine) PERMITS, and
#S-020700-WD-BI-N) WATER QUALITY CERTIFICATION
#L-024251-TG-C-N)
) FIFTH PROCEDURAL ORDER

As set forth in the Second and Third Procedural Orders governing the application for expansion of the Juniper Ridge Landfill, Applicant State of Maine Bureau of General Services (BGS) and NEWSME Landfill Operations, LLC (NEWSME), Intervenor City of Old Town, and Intervenor Edward S. Spencer each submitted pre-filed direct testimony on July 29, 2016. The deadline for any motions to strike pre-filed direct testimony was Friday, August 12, 2016. The Board received timely motions to strike from BGS/NEWSME and Intervenor Edward Spencer. Responses to the motions to strike were filed by the City of Old Town on August 16, 2016 and by BGS/NEWSME and by Edward Spencer on August 18, 2016. This Order sets forth the rulings of the Presiding Officer on the motions to strike pre-filed direct testimony in this proceeding.

1. Criteria for Consideration of Motions to Strike Testimony

The Maine Administrative Procedure Act (M.A.P.A.), 5 M.R.S. § 9057(2) provides that “Evidence shall be admitted if it is the kind of evidence upon which reasonable persons are accustomed to rely in the conduct of serious affairs. Agencies may exclude irrelevant or unduly repetitious evidence.” The Department’s *Rules Governing the Conduct of Licensing Hearings*, 06-096 C.M.R. ch.3 (effective February 16, 2015), § 20(A), states that “Evidence will be admitted if it is relevant and material to the subject matter of the hearing and is of a kind upon which reasonable persons are accustomed to rely in the conduct of serious affairs. Evidence which is irrelevant, immaterial or unduly repetitious will be excluded.”

2. Motion by Edward S. Spencer to Strike Testimony of Applicant BGS and NEWSME

Mr. Spencer filed a motion to strike several statements by BGS/NEWSME witnesses Michael Barden and Toni King arguing that the statements were false, irrelevant, or misleading.

In its response to the motion to strike, BGS/NEWSME commented in general that a motion to strike is not an opportunity to argue the merits of the case and that the parties will have an opportunity to submit rebuttal testimony and cross-examine witnesses on the accuracy of their testimony.

Mr. Spencer's individual motions, responses to the motions, and my rulings are set forth below.

A. Term of OSA (Operating Services Agreement between Casella and the State of Maine)

Mr. Spencer moves to strike Mr. Barden's statement on page 2 (first paragraph, last sentence) "The term of the OSA is 30 years" as misleading. Alternatively, Mr. Spencer asks that the Board require a clarifying passage.

BGS/NEWSME respond, in part, that the statement regarding the term of the OSA serves to explain the relationship between the State, as the owner of JRL, and NEWSME, as the operator, and that Mr. Spencer makes no claim that the term of the OSA is irrelevant, immaterial, or unduly repetitious.

Ruling: The motion to strike is denied. Mr. Barden's statement provides background information on the relationship between the owner and the operator of the proposed expansion and is not irrelevant, immaterial or unduly repetitious. Mr. Spencer may submit rebuttal testimony and/or cross-examine Mr. Barden on his testimony at the hearing.

B. Capacity Needs

Mr. Spencer moves to strike Mr. Barden's statement on page 4 (first sentence) beginning with "Additional state solid waste landfill capacity ..." as misleading and possibly false.

BGS/NEWSME respond, in part, that Mr. Spencer's disagreement with Mr. Barden's statement and analysis regarding landfill capacity is not a basis to exclude it.

Ruling: The motion to strike is denied. Mr. Barden's statement addresses the rationale for the proposed expansion and is not irrelevant, immaterial or unduly repetitious. Mr. Spencer may submit rebuttal testimony and/or cross-examine Mr. Barden at the hearing.

C. Alternative Daily Cover (ADC) Amounts

Mr. Spencer cites what he believes to be a conflict between the statement by Old Town City Manager Bill Mayo (page 2, paragraph 3, last sentence) beginning "Casella also demonstrated ..." and several of Ms. King's statements regarding the amount of construction demolition debris (CDD) fines used as alternative daily cover (ADC) at the Juniper Ridge Landfill. The challenged statements in Ms. King's testimony are:

- the last sentence at the bottom of page 2, beginning "In addition, there are no other solid waste management techniques..." through the first sentence at the top of page 3 ending, "...alternate daily cover."
- the second to last sentence under the section titled "Landfill" on page 5 beginning, "About 30 percent..."
- the sentence beginning at the bottom of page 7, "About 30% of the waste that is accepted at JRL is used in landfill operations in this manner as alternate daily cover."

Mr. Spencer requests that the Chair strike the false statement(s), either from Mr. Mayo's or Ms. King's testimony.

BGS/NEWSME respond, in part, that Mr. Spencer has not challenged the relevancy of the testimony and that questions about the merits of the testimony are not a basis for a motion to strike. They further argue that the statements are not inconsistent and that Mr. Spencer may cross-examine the witnesses on their testimony at the hearing.

In its response to the motion to strike, the City of Old Town responds, in part, that "a perceived discrepancy between witnesses' statements does not mean that either statement is false or misleading" (page 1, paragraph 2) and that any factual differences may be addressed through cross-examination.

Ruling: The motion to strike is denied. Testimony regarding the use of CDD fines as alternative daily cover is relevant to the proposed expansion of the landfill and the wastes to be accepted at the landfill. The witnesses may be cross-examined on their testimony at the hearing.

D. Oversized Bulky Wastes (OBW)

Mr. Spencer moves to strike as misleading the first sentence in Ms. King's testimony on "Oversized Bulky Wastes" (page 5) beginning "Because of the very low volume of Oversized Bulky Waste (OBW) ..." Mr. Spencer also moves to strike the last sentence in paragraph 5 on page 10 of Ms. King's testimony, "Therefore, an OBW limitation placed on JRL expansion acceptance in this proceeding is not required." Mr. Spencer argues that Commissioner Aho determined in the Public Benefit Determination (PBD) that any license would include a limit on the volume of OBW; therefore, the only question is what the limit should be.

BGS/NEWSME respond that Ms. King's characterization of the volume of OBW is a matter of opinion, not legal relevance. Mr. Spencer may submit rebuttal testimony and may cross-examine the witness at hearing.

Ruling: The motion to strike is denied. The testimony is relevant to the nature and quantities of wastes proposed for disposal in the expansion as well as the condition of the Public Benefit Determination regarding a limit on OBW. The parties may submit rebuttal testimony and may cross-examine the witness on her testimony.

E. Relevant Metric

Mr. Spencer moves to strike as irrelevant all statements in Ms. King's testimony regarding metrics for evaluating the Applicant's compliance with the Solid Waste Management Hierarchy. He argues that the Department should determine the relevant metrics.

BGS/NEWSME respond that the Department's Solid Waste Management rules (Chapter 400, § 4(N)(2)(a)) direct an applicant to suggest relevant metrics.

Ruling: The motion to strike is denied. The application contains suggested metrics as required by the Department’s rules. Parties may submit rebuttal testimony and may cross-examine the witness at the hearing on the Applicant’s proposed metrics for assessing compliance with the hierarchy.

3. BGS/NEWSME’s Motion to Strike Testimony of Intervenor Edward S. Spencer and his Expert Witness Dr. Stephen Coghlan

BGS/NEWSME move to strike as irrelevant portions of Mr. Spencer’s testimony addressing the Operating Services Agreement (OSA), the role of the Juniper Ridge Landfill Advisory Committee (JRLAC or LAC), and Operations of MFGR’s¹ Treatment Plant. They also move to strike portions of Dr. Coghlan’s testimony on biophysical economics, climate change, and alternative ways to value wetlands as irrelevant, as well as Dr. Coghlan’s technical references and links to various documents as not in accordance with the procedural orders governing submission of testimony. The motions, responses thereto, and my rulings are set forth below.

A. Operating Services Agreement

BGS/NEWSME move to strike in its entirety Mr. Spencer’s testimony on page 4, second paragraph beginning with “Also contained in the Conclusions of the PBD...”, regarding the Commissioner’s recommendation that the State and Casella amend the OSA as well as his summary statement on page 9 that a permit should not be granted until Casella has complied with the PBD by amending the OSA.

In the motion to strike, BGS/NEWSME cite the ruling in the Third Procedural Order (page 4) that the terms of the OSA are not subject to review in this licensing proceeding, that the Board has no authority to amend the OSA, and that the PBD is relevant to the extent it imposes conditions on any license that may be issued in this proceeding. They further argue that the Commissioner’s recommendation is not a directive or condition of the PBD, but simply a recommendation.

Mr. Spencer argues in response that the primary purpose of his testimony is “[t]o demonstrate that Casella/BGS have not fully complied with the conclusions and conditions of the PBD” and that the Chair has ruled that the PBD is relevant to the expansion hearing. He acknowledges that the DEP/BEP does not have authority to change the OSA, but argues that the Commissioner’s recommendation has meaning and the Board Chair has expressed curiosity about the Commissioner’s statement regarding changes to the OSA.

Ruling: The Operating Service Agreement (OSA) is part of the record in this licensing proceeding, and the Commissioner included in the 2011 Public Benefit Determination (PBD) (page 19) a recommendation that the State and Casella “amend the OSA to address the significant quantity of CDD imported into Maine under the terms of the OSA.” On the next page of the PBD (page 20), the Commissioner found “that it is necessary and appropriate to establish a limit on the tonnage of OBW disposed in the expansion” and that “[i]f, and when, a license is issued for the construction and operation of an expansion, the Department will establish such a

¹ MFGR is the current owner and operator of the waste water treatment plant located at the former paper mill in Old Town.

limit.” The Commissioner’s recommendation may be relevant as background to the Board’s understanding the OBW condition in the PBD (page 29) that “[t]he applicant shall, if, and when, a license is issued for the construction and operation of the 9.35 million cubic yard expansion, comply with the limit, and any subsequent modifications to the limit, established by the Department in the license on the tonnage of OBW that may be disposed in the 9.35 million cubic yard expansion.” The Board will be determining the appropriate OBW limit in this licensing proceeding.

As stated in the Second and Third Procedural Orders (on pages 5 and 4, respectively), the terms of the OSA are not subject to review in this licensing proceeding, and the Board has no authority in this proceeding to revise or mandate a change in the OSA. However, given the possible relevance of the Commissioner’s recommendation as background to understanding the OBW condition of approval in the PBD, Mr. Spencer’s testimony regarding the Commissioner’s recommendation may be helpful to the Board and will be allowed. At the June 23, 2016 Board meeting (as reflected in those meeting minutes), I noted that I would like the Board to receive clarification on why the Commissioner recommended that the State and Casella review the OSA.

BGS/NEWSME’s motion to strike Mr. Spencer’s testimony (on page 4) regarding the Commissioner’s recommendation is denied. The motion to strike Mr. Spencer’s statement in his summary (on page 9) also is denied, but as stated previously, the Board has no authority to require amendment of the OSA.

B. Role of the Juniper Ridge Landfill Advisory Committee

BGS/NEWSME move to strike in its entirety Mr. Spencer’s testimony (page 8, first paragraph) regarding the role of the Juniper Ridge Landfill Advisory Committee (JRLAC or LAC) including his suggestion that the role of the JRLAC should be clarified before expansion of the landfill. They argue that Mr. Spencer did not propose this issue as one he wanted to address at the hearing as required by the Second Procedural Order (page 7). They further argue that the Board has no authority to clarify the role of the JRLAC.

In response to the motion, Mr. Spencer argues that Mr. Barden’s testimony discusses the role of the JRLAC and Mr. Barden’s duties in regard to the Committee. Mr. Spencer argues that his testimony offers some history on the JRLAC and some constructive criticism. He further argues that if his testimony is struck, Mr. Barden’s testimony on the JRLAC should also be struck.

Ruling: BGS/MEWSME’s motion to strike the part of Mr. Spencer’s testimony (in the first three sentences of the first paragraph of page 8) generally describing the Juniper Ridge Landfill Advisory Committee and its role is denied. A witness for BGS also offered testimony on the JRLAC.

The Chair grants the Applicant’s motion to strike as to the last three sentences of the first paragraph of page 8. Mr. Spencer has pointed to no specific licensing standard in statute or rule that would make the offered testimony relevant. Also, Mr. Spencer did not raise his concerns over communications by the State Planning Office/Bureau of General Services with the JRLAC as an issue before submitting pre-filed testimony, as required by the Second Procedural Order (page 7).

C. Operations of MFGR's Treatment Plant

BGS/NEWSME move to strike in its entirety the second paragraph on page 8 of Mr. Spencer's testimony beginning "The Old Town Mill has not operated since last fall (2015)" in which Mr. Spencer questions the Applicant's proposal to transport leachate to the wastewater treatment plant at the former Old Town Mill for treatment and disposal. In the motion to strike, BGS/NEWSME argue that the Old Town Mill's facility holds a valid wastewater discharge license from the Department to treat the leachate from the proposed JRL expansion and that the Board cannot exercise jurisdiction over the operations of that facility in this licensing proceeding.

In his response to the motion to strike, Mr. Spencer argues that statute (38 MRS § 1310-N(1)) requires that the proposed facility "not pollute any water of the State, contaminate the ambient air, constitute a hazard to health or welfare or create a nuisance" and that questions regarding the operation of the former Old Town Mill's wastewater treatment facility and that facility's discharge to the Penobscot River are relevant.

Ruling: The Board acknowledges the statutory requirement that the proposed JRL expansion not pollute any water of the State. Additionally, Chapter 400, § 4(H)(2) requires that an application for a solid waste facility "include evidence that affirmatively demonstrates that there will be no unreasonable adverse effect on surface water quality." Under the Department's rules (Chapter 401, § 2(F)(5)), one of the leachate management options available to an applicant is "off-site transport to a licensed waste water treatment facility for treatment and disposal." Provided the waste water treatment facility is licensed to accept the leachate and is in compliance with the terms of its license, issues regarding the operation of the off-site waste water treatment facility are beyond the scope of the current licensing proceeding. Accordingly, the following are struck from the second paragraph on page 8 of Mr. Spencer's testimony: (a) starting with "It has been difficult to . . ." on line 4 and ending with "Was the PH balanced to match the River's?" on line 8; and (b) starting with "There is so much . . ." on line 9 and ending with "designed to protect" on line 15.

D. Biophysical Economics

BGS/NEWSME move to strike Dr. Coghlan's testimony regarding biophysical economics (BPE) beginning with the first sentence of the last paragraph on page 6 "Looking at the larger issue of landfills in general..." through the last full paragraph on page 10, and ending with "I encourage Maine DEP and all partners in waste management to rise to that challenge."

They argue that the discussion is "almost entirely focused on global issues" and is "a policy briefing on how society should re-think its approach to environmental issues through a particular economic lens." They also argue that the testimony does not relate to relevant licensing standards.

In response to the motion, Mr. Spencer argues that the testimony "is intended to assist the Board members in an analysis of JRL Expansion's effects on our human and ecological system" and "offers specific examples of the harm caused by overdevelopment ..." He further argues, "To

strike all references to Biophysical Economics from this testimony would be to deny the Board insight as to Dr. Coghlan's overall methods of evaluating a JRL Expansion."

Ruling: The testimony of Dr. Coghlan on biophysical economics is essentially a policy discussion for "a different worldview to better understand how our economy and the waste it generates relates to nature, and how that relationship in turn feeds back to affect our society." (Coghlan Testimony at page 6.) He closes this part of his testimony with: "In my opinion, we have absolutely no hope of achieving sustainability in waste disposal or in any other societal endeavor, or in dealing with our existential planetary crisis, until we adopt a BPE view of our interconnected economic-environmental systems, face the hard reality of constraints imposed by nature, and work within those constraints rather than deny their existence. I encourage Maine DEP and all partners in waste management to rise to that challenge." (Coghlan Testimony at page 10.) This general discussion of biophysical economics is not relevant to any specific licensing criteria being applied in the present proceeding. Dr. Coghlan does make reference to the landfill expansion application at a few points in his testimony. While Dr. Coghlan refers to the application on page 9 of his testimony, it is in the context of encouraging the Department and the Applicant to consider benefits and costs. Neither Dr. Coghlan nor Mr. Spencer, in his opposition to the motion to strike, has shown how that is relevant to any licensing criteria. Dr. Coghlan also mentions the expansion application on page 10 of his testimony in stating that "[i]n the context of the JRL expansion, we should take home 3 major points," essentially that (1) "our population and industrialized economy have already overshoot planetary carrying capacity;" (2) "we are producing waste faster than can be assimilated by the environment;" and (3) "the only way to reduce waste production to sustainable levels is to shrink our economy and its metabolic throughput." Neither Dr. Coghlan nor Mr. Spencer has shown how this testimony is relevant to the task before the Board to apply the licensing standards to the expansion application.

On page 10 of his testimony, Dr. Coghlan mentions the waste reduction prong of the State's solid waste management hierarchy, quotes a sentence from a document in the application, and makes a comment on the quoted language. As this discussion is arguably relevant to the application and to licensing criteria, this testimony (on lines 7 to 15 of the second paragraph) will be allowed.

Most of the testimony regarding biophysical economics is not relevant to the present licensing proceeding, and the motion to strike is granted in substantial part. The following will be struck from Dr. Coghlan's testimony:

- starting with "Looking at the larger issue of landfills . . ." on the bottom of page 6 and ending with "to a size that is sustainable on a finite planet (Daly 1991; Callenbach 2014)" in the second paragraph on page 10; and
- the paragraph starting with "If we have already overshoot carrying capacity . . ." on page 10 and ending with "I encourage Maine DEP and all partners in waste management to rise to that challenge" towards the bottom of page 10.

E. Testimony on Climate Change

BGS/NEWSME move to strike in its entirety Dr. Coghlan's testimony regarding Climate Change (pages 10-12 under the heading "The Elephant in the Landfill: Climate Change"). They argue that there is not a relevant licensing standard that directly addresses anthropogenic climate change (ACC). They further argue that an applicant "must demonstrate compliance with the rules that exist today, and he [Dr. Coghlan] has offered no opinion as to how such considerations should be factored into determining whether those rules have been met."

In response to the motion, Mr. Spencer argues that climate change is relevant to "planning for how we generate and dispose of waste over the short-and long term ..." He further argues that Dr. Coghlan "offers scientific opinion about how this would affect landfill design and function through the lifetime of JRL." He argues that "landfills are one of the leading sources of man-made Greenhouse Gases" and "discussion of how Climate Change could affect an expanded JRL are critical, especially as it relates to wetlands and floodplain planning."

Ruling: Much of Dr. Coghlan's testimony on climate change on pages 10 to 12 regards what he terms the application's "failure to acknowledge and consider anthropogenic climate change." He does not point to any specific licensing criteria that require a general analysis of climate change. Dr. Coghlan, on page 11 of his testimony, however, does specifically question the Applicant's use of floodplain information from 1978 given anthropogenic climate change. Chapter 400, § 4(M)(1), which is applicable to this proceeding, provides that "A solid waste facility may not unreasonably cause or increase flooding on-site or on adjacent properties nor create an unreasonable flood hazard to a structure." The rule sets forth certain requirements that must be met (e.g., Chapter 400, § 4(M)(1)(b) requires that "[a] solid waste facility must include a stormwater management system that controls run-on and run-off, and infiltrates, detains, or retains water falling on the facility site during a storm of an intensity up to and including a 25-year, 24-hour storm, such that the rate of flow of stormwater from the facility after construction does not exceed the rate of outflow of stormwater from the facility site prior to the construction of the facility").

Dr. Coghlan's testimony on climate change on pages 10 and 11, in large part, will be allowed as background and context for his testimony regarding flood risk at the site. To the extent that his testimony could be interpreted as arguing for licensing criteria that do not currently exist in Maine statute or rule, the Board understands that it is bound by existing statutes and rules and will consider the testimony only in that light.

The testimony in the climate change section at the top of page 12 regarding Atlantic salmon will be allowed as it is somewhat similar to testimony on salmon on page 4 of Dr. Coghlan's testimony.

The motion to strike the climate change section is granted in part. A sentence in Dr. Coghlan's testimony towards the bottom of page 11 is struck: "The same could be said for delineation of wetlands – if precipitation patterns change and flooding risk increases upgradient, might we expect new wetlands to form closer to the facilities?" This testimony is not arguably related to Dr. Coghlan's testimony questioning floodplain information used in the application and does not appear relevant to licensing criteria. Also, the following testimony regarding wetlands will be

struck: the last nine lines of the paragraph on the top of page 12, starting with “Similarly, a small amount of wetland destruction . . .” and ending with “a reliably small response under future ACC scenarios.” Neither Dr. Coghlan in his testimony nor Mr. Spencer in his opposition to the motion to strike has shown how this testimony relates to licensing criteria.

F. Testimony on Alternative Wetland Valuation Strategies

BGS/NEWSME move to strike Dr. Coghlan’s testimony “How shall we value wetlands?” on pages 12 through 14. BGS/NEWSME argue that Dr. Coghlan “offers testimony regarding the failure of traditional methods of valuing wetlands and the functions and values they provide” but omits any discussion of “how this can be reconciled with the existing rules that apply to this project.” They argue that the “discussion of an alternative way to value wetlands is a public policy discussion better reserved for another forum” and is irrelevant to the current licensing proceeding.

Mr. Spencer responds that the wetlands alternatives analysis and compensation plan are part of the NRPA application and are therefore relevant issues. He argues that Dr. Coghlan “introduces an alternative approach to wetlands valuation” and that the Board has authority to consider it.

Ruling: Dr. Coughlan’s testimony on how wetlands should be valued (on pages 12-14) does not explain how the alternative approach to valuing wetlands (eMergy synthesis) that he recommends is relevant to the licensing criteria in Maine’s statutes and rules. He also has not performed an alternative analysis to that conducted by the Applicant; rather he states that “[i]f the applicants were to conduct such a synthesis, we would have very useful information with which to value the impacted wetlands, and perhaps even to value the service provided by the landfill as well.” Mr. Spencer’s opposition to the motion to strike also does not explain how the recommended wetland valuation approach would relate to the applicable statutory and rule licensing criteria. Dr. Coghlan’s testimony on how wetlands should be valued is not relevant to the present licensing proceeding, and the motion to strike is granted. The following will be struck from Dr. Coghlan’s testimony: starting at “How shall we value wetlands?” on page 12 and ending with “I would encourage the Applicant to pursue this avenue as well” at the bottom of page 14.

G. Citations to References and Links to Documents

BGS/NEWSME move to strike all references from Dr. Coghlan’s testimony, including citations to academic articles, websites, and a YouTube video, because they were not included as exhibits. They cite the Second Procedural Order (page 5) and the Fourth Procedural Order (page 2) which state that the Board “will not accept links to documents; the documents, or relevant portions thereof, must be submitted as exhibits.”

Mr. Spencer responds that Dr. Coghlan’s testimony is “written as standard scientific literature and acceptable throughout the world as such. His references, mainly consisting of peer reviewed published books and scientific journals, reflect sources of his scientific knowledge, and cannot usually be distilled to one quote on a single page. As to links to documents, in this day and age much information only exists in digital repositories . . .” He goes on to argue that submission of the documents would have required production of multiple copies of lengthy documents.

Ruling: The Second Procedural Order (page 5) states, “Exhibits must be filed along with relevant testimony. The Board will not accept links to documents; the documents, or relevant portions thereof, must be submitted as exhibits.” The Fourth Procedural Order (page 2) reiterates that the Board will not accept links to documents. These provisions of the Second and Fourth Procedural Orders pertaining to pre-filed testimony are intended to clarify that it is the responsibility of the witness to procure and submit the documents that it wants entered into the record in this licensing proceeding; it is not the responsibility of the Board to locate these documents, identify the relevant portions, and enter them as exhibits on behalf of the witness. Consistent with these rulings, the actual documents cited in the references and links to websites are not included in the record of this licensing proceeding. However, it is appropriate for Dr. Coghlan to provide citations (or otherwise credit) the relevant body of scientific work and other documents that he referred to or drew upon in the formulation of his testimony. Accordingly, the motion to strike all such references from the body of Dr. Coghlan’s testimony is denied. However, in instances where the testimony is struck, the corresponding reference will be struck.

4. Schedule

- The deadline for any appeal of the rulings on the motions to strike testimony set forth in this Procedural Order is Monday, August 29, 2016.
- The Board will consider any appeal of this Procedural Order at its meeting on Thursday, September 1, 2016.

DONE AND DATED AT AUGUSTA, MAINE THIS 25th DAY OF AUGUST, 2016.

BOARD OF ENVIRONMENTAL PROTECTION



BY: _____
James W. Parker, Board Chair
and Presiding Officer