



May 24, 2022

Mark A. Woodley, Permit Manager
Alabama Surface Mining Commission (ASMC)
P.O. Box 2390
Jasper, AL 35502-2390

RE: Response to Notice of Filing of a Revision Application for Surface Coal Mining
Permit Dated April 26, 2022

Directors / Officers

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Dear Mr. Woodley:

The Water Works Board of the City of Birmingham (Board) is providing the following comments to the Permit Revision Application for the No. 5 Mine (ASMC P-3957) located in Walker County, Alabama.¹ These comments are regarding Proposed Revision Number R-5 which is seeking revisions to the Permit for: 1) Updating the Operation Plan to include a Special Overburden Handling Plan for Increment No. 2; and 2) Updating the Operation Plan map to show no coal area. A "Special Overburden Handling Report" (Report) dated April 12, 2022, was completed for the above-referenced property for Mays Mine, Inc.

As an initial comment and as ASMC is aware, this Permit has been the subject of numerous administrative appeals and litigation in the courts. At present, an appeal is currently pending in the Circuit Court for Walker County, Alabama. In that action, the Board argues that the Permit has already expired and thus any actions taken by ASMC regarding the Permit after such expiration are null and void. Therefore, the Board states that the proposed revisions to the Permit are improper, and if granted, would be null and void because the Permit has already expired. At a minimum, ASMC should stay consideration of this proposed revision until a final adjudication (including any appeals) is made in this case. Without waiving this comment and objection to the Proposed Revision, the Board offers the following comments and objections based on a review of the Report.

General Manager

Michael Johnson, MBA, CPA

Assistant General Managers

Iris Fisher, MAC, CPA
Finance & Administration

Derrick M. Murphy, MEng
Engineering & Maintenance

Jeffrey F. Thompson, P.E.
Operations & Technical Services

Report Introduction

1. The plan refers to the preliminary investigation performed inside the designated footprint of the former plywood plant by Spectrum dated December 21, 2017, attached as Exhibit 2 of the plan. A previous review of the 2017 investigation report found the investigation to be inadequate and not in compliance with Alabama Department of Environmental Management (ADEM) Alabama Risk Based Corrective Action Guidance (ARBCA). Previous review comments regarding the 2017 investigation have not been addressed or responded to by Mays Mine, Inc. These comments are again submitted as part of this "Special Overburden Handling Report" review.
 - a. Review comments of the 2017 report regarding the preliminary investigation performed inside the designated footprint of the former plywood plant by Spectrum dated December 21, 2017, referenced in the "Special Overburden Handling Report":

¹ The Notice of this Proposed Revision received by the Board is dated April 26, 2022, and states that all comments must be "received within thirty (30) days of this Notice" ie. May 26, 2022. ASMC's Regulations however provide that comments must be received "within thirty (30) days after the last publication of the newspaper notice required by paragraph (1) of this section." See ASMC Admin. Code 880-X-8K-.05(2). As stated in the newspaper publication in the Daily Mountain Eagle, the last date of publication of this Notice was May 17, 2022. Thus, based on ASMC's own regulations, the deadline for comments is June 16, 2022.

Soil

- i. The report includes use of United States Environmental Protection Agency (USEPA) Regional Screening Levels (RSLs) "Industrial Soil" for screening level comparison of detected constituent concentrations in soil. The Alabama Department of Environmental (ADEM) Alabama Risk Based Corrective Action Guidance (ARBCA) requires that if a site utilizes any land use other than an unrestricted land use for environmental screening level comparisons, an environmental covenant developed in accordance with ADEM Admin. Code div. 335-5 should be submitted for ADEM review and recorded in the Judge of Probate's Office. Therefore, if this site does not have covenants restricting it to Industrial use only, the USEPA "Residential" soil RSLs should be used for comparisons to constituent concentration detections. The significance is that formaldehyde concentrations detected in soil samples collected during the investigation exceeded the USEPA Residential RSL of 17 mg/kg; however, fell below the Industrial RSL of 73 mg/kg.
- ii. The incorrect RSL for phenol was used for the screening level comparison of constituent concentrations resulting in a higher screening level (one order of magnitude higher). A hazard quotient (HQ) of 0.1 should have been selected for phenol when viewing the RSL table during the screening level evaluation. The ADEM ARBCA states, "For non-carcinogenic effects for the RSLs, a HQ of 0.1 should be used (Note: There is an option to select an HQ = 1.0. This option is not allowed for use in the State of Alabama)." The report utilized an HQ = 1 for phenol.
- iii. Both phenol and formaldehyde concentrations detected in soil samples exceeded the USEPA Risk-Based Soil Screening Levels (SSLs) listed in the RSL table for protection of groundwater. No discussion or withdrawal of comparisons for detected soil concentrations to SSLs is provided in the report.
- iv. The report does not include an evaluation or assessment of the phenol and formaldehyde detected in site soil as it relates to odor and taste threshold and effects to surface water quality. The report includes only a supposition that "soils may liberate phenols during mining but should be dissipated during the site operations and not likely impact the water intake."
- v. Heavy metals were not evaluated during the soil investigation.

Groundwater

- i. Similar to the incorrect RSL for phenol in soil, the incorrect RSL for phenol in water was used for the screening level comparison of constituent concentrations resulting in a higher screening level (one order of magnitude higher). A hazard quotient (HQ) of 0.1 should have been selected for phenol when viewing the RSL table during the screening level evaluation. Further, the ARBCA states, "For non-carcinogenic effects for the RSLs, a HQ of 0.1 should be used (Note: There is an option to select an HQ = 1.0. This option is not allowed for use in the State of Alabama)." The report utilized an HQ = 1 for phenol.
- ii. The laboratory reporting limit for formaldehyde in water was 50 ug/L. The EPA tap water RSL for formaldehyde is 0.43 ug/L. Therefore, the laboratory reporting limit was two orders of magnitude higher than the tap water screening level.
- iii. A groundwater elevation survey was not performed during the investigation. Therefore, groundwater flow direction is unknown. Further, it is unknown if groundwater samples were collected hydraulically downgradient or within former operational areas of concern and prior to discharge to surface water.

General Comments

- i. Review indicates inconsistencies in the sample chain of custody documents accompanying the samples collected during the investigation. Both samplers signed and dated that the samples were relinquished on 11/17/17 at time 12:00. However, groundwater samples were

collected on 11/18/17. Additionally, the analytical laboratory received the sample shipment on 11/18/17 at time 08:45; however, the chain of custody document shows that samples were collected in the field after the sample shipment had been received at the laboratory.

- ii. Sludge or accumulated waste and sediments in the former onsite wastewater lagoons were not evaluated during the investigation.
 - iii. The report does not link soil or groundwater sample locations to the area of former operational areas investigated previously.
2. In consideration of review comments concerning the 2017 preliminary assessment report, constituents were detected above RSLs required for compliance in accordance with Alabama Department of Environmental Management (ADEM) Alabama Risk Based Corrective Action Guidance (ARBCA). A more comprehensive evaluation of risks to human health or the environment may be needed in accordance with ADEM ARBCA. Mining activities in this area have the potential to impact drinking water. A comprehensive evaluation of potential risk is needed to further determine risks to BWW's drinking water services to residents and community in general. Further investigation of potential impacts and potential remedial and/or mitigation actions required to protect the drinking water supply intake should mining activities be conducted at this location.

Report Sampling Strategy

3. Soil, surface water, sediment, and groundwater sample locations (on and offsite) proposed in this report and those selected for analysis in the previous 2017 preliminary assessment, are not adequately distributed among the three abandoned plywood manufacturing designated areas to characterize site conditions prior to initiating mining activities in this area (refer to the Special Overburden Handling Report (site) map (page 5 of the report) regarding previous and currently proposed sample locations). A nested grid sampling strategy across areas potential affected by proposed mining activities and evenly distributed within each grid is recommended to fully characterize soil and subsurface soil environments.
4. Sampling and analysis activities proposed in this report are limited to locations as follows: "an additional 11 sample locations will be added both inside and outside of the defined plywood plant area. These sample sites will consist of seven soil sample sites, two surface water sites, and two groundwater sites." The proposed sampling strategy is limited to these newly proposed sample locations with the stated objective of confirming 2017 preliminary assessment findings based on previous soil, surface water, and groundwater sample data and analyses. Confirmation of previous sample analysis results would require sampling and analysis activities consistent with previous analysis at these previous locations. Routine monitoring of site conditions is required to confirm previously site condition assessment findings.
5. Subsurface soil sampling depth and sample numbers to be collected for analysis is not clear or adequately addressed in the report. Report information is contradictory and lacks detailed, specific information as to how subsurface soil monitoring at the site will be accomplished. For example, the report indicates subsurface core soil samples will be collected to a depth of 5 feet below ground surface. The report also states that AIERG, Section 2.3.7 (a) (iv-viii) guidance includes subsurface soil sampling and analysis to a maximum depth of twenty feet, in five-foot intervals, or to a depth of where groundwater or bedrock is encountered. Furthermore, the report states that, as requested by the Alabama Surface Commission, sampling will be done to a depth of twenty feet or until the New Castle seam is encountered, whichever is greater.
6. Groundwater sampling is limited to two locations at groundwater monitoring wells installed during the initial permitting process. Additional onsite and offsite groundwater samples are required to adequately characterize site Contaminants of Concern (COCs) and monitor potential COC migration to the receiving stream associated with groundwater.
7. Surface water sampling is limited to two onsite locations within three abandoned plywood manufacturing plant designated areas. Additional surface water and sediment samples of both site lagoons and the receiving stream are required to adequately characterize site COCs and monitor potential COC migration to receiving stream surface water. Sediment samples at co-located surface water sampling locations are also required to adequately characterize site COCs and monitor potential COC migration to receiving stream sediments.

Surface water and sediment samples should be assessed for COC concentrations and acute benthic toxicity in alignment with the site's current ADEM NPDES permit.

8. The 2017 preliminary assessment of groundwater did not include a groundwater elevation survey (refer to review items above, items i, ii, and iii for Groundwater). Therefore, groundwater flows and direction are unknown. It is unknown if groundwater samples were collected hydraulically downgradient or within former operational areas of concern and prior to discharge to surface water. The 2022 handling report states "The Spectrum groundwater monitoring stations were located from the North-Northwest end of the plywood plant, along and inside of the plywood plant, and on the South-Southeast end of the plywood plant. The groundwater movement within the permit area is believed to be in the Southwest direction which is the direction of the primary dip of the strata, as described inside of Attachment II-F, Groundwater Hydrology, located inside the original permit application for P-3957. MW- H256 is southeast of the plant area and southeast of the Spectrum groundwater monitoring sites. All Spectrum monitoring sites showed phenol and formaldehyde to be below the published EPA and ADEM regulatory limits for tap water. Sampling of these monitoring wells is proposed to identify any groundwater contamination down dip, from the plywood plant area."
9. A characterization of surface water and groundwater hydrology is needed to identify potential contaminant pathways that may affect the receiving stream drinking water source intake. Proposed sampling and analysis strategies should align with locations that target analysis and monitoring of potential hydrologic and geologic contaminant pathways for potential migration of COCs from proposed mining activities. For example, an adequate assessment and monitoring strategy must account for potential surface water flood and stormwater runoff, soil leachate to groundwater, soil erosion and sedimentation, and groundwater to surface water pathways to receiving stream surface water and sediments.
10. A detailed protocol for soil, surface water, sediment, and groundwater contaminant screening and further delineation of concentrations that exceed EPA Regional Screening Level (RSL) should be included in this report. Current report information is not adequate to establish a protocol for further investigation and/or monitoring of sample analysis of COC concentrations above required screening levels. A detailed standard protocol is needed to delineate horizontal and vertical extent of contamination at sample locations, as appropriate. Information in the report is unclear and lacks sufficient detail with regards to sample protocols, COC analysis, and assessment requirements.
11. As noted in a previous review of the 2017 preliminary site assessment, adequate characterization of on and offsite presence of VOCs, SVOCs and inorganic compounds in soils groundwater, surface water, and sediment potentially associated with previous manufacturing processes has not been completed to date. Soil, groundwater, surface water, and sediment sample analysis for COCs should include phenol, formaldehyde, SVOCs, and inorganic compounds to adequately characterized site conditions to identify further assessment and monitoring of potential site related COCs. COCs identified for analysis in environmental media must include phenol and formaldehyde at the very minimum. In addition, assessment of background conditions to serve as a baseline for comparison of previous and proposed sampling analysis.
12. As noted above in a previous review of the 2017 preliminary investigation, "Residential" soil RSLs are required for environmental screening level comparisons in compliance with compliance with ADEM ARBCA. The report indicates that EPA Regional Screening Level (RSL) for commercial use will serve as the screening standard for comparison of analysis results. The use of EPA Regional Screening Level (RSL) values for residential and/or drinking water are required for comparison of all sample analyses in compliance with ADEM ARBCA.

Report Implementation Schedule

13. The report indicates that identification of contamination within each mining cut and across the new proposed mining area will be based on a combination of newly proposed and previous sample sites and analyses from the 2017 preliminary assessment. Sample results and analysis in the 2017 preliminary assessment report include locations with COC concentrations above applicable ADEM ARBCA screening values (refer to Report Introduction review comments above).
14. The report's proposed sampling strategy does not include clear or specific information regarding sampling and analysis proposed within mining cuts 2-1 through 2-7 or 2-8 through 2-10. Proposed soil and water samples (11 total) in the report's attached site map do not include proposed sample locations in every mining

cut, including those proposed for cuts 2-1 through 2-7. A single, proposed surface soil sample location (M-1) is located at one end of mining cut no. 2-1 to identify contamination across the entire length of the cut's location. Mining cut no. 2-2 includes one proposed surface soil sample (M-3) at one end, and possibly one additional sample (M-4) located between cut no. 2-2 and 2-3 to identify contamination across the entire length of the cut. Cuts no. 2-6, 2-9, and 2-10 do not include any proposed sampling locations.

15. The report's proposed sampling strategy does not include clear or specific sampling and analysis to be conducted for testing that will "determine the horizontal and vertical limits of the contamination", "additional testing will take place immediately after the initial results are received" and/or an adequate strategy to identify "contaminated samples" that may exist in "any mining inside that cut for which the initial contaminated sample was gathered". Information regarding a proposed strategy to conduct this testing is limited to the following statement: "The horizontal extent of the contaminated area will be identified on the surface."
16. The report states that "Sampling of groundwater site M10-H-256, and M11-H-257, will be done at the initial testing, to provide a baseline, and bi-weekly, while mining is ongoing." The report's proposed groundwater sampling strategy is inadequate to provide a baseline for comparison to additional, proposed sample analysis to monitor the presence of COCs during mining activities at proposed groundwater sample locations. As noted above, previous groundwater sample locations are not included in the proposed groundwater sampling strategy. Previous, and currently proposed, groundwater sample locations and analyses do not fully characterize background, onsite, or offsite COC concentrations or distribution in groundwater. Site hydrogeology has not been assessed at the site, including in relation to soil and surface water pathways.
17. The report does not include information or details proposed regarding groundwater sample timeframes or assessments associated with determinations stated in the report as follows: "If it is determined, after enough bi-weekly analytical results, that phenols and formaldehyde are not present, or are below EPA RSLs, monitoring intervals can be changed as determined by the Alabama Surface Mining Commission." Information, at minimum, should be included for EPA RSLs considered as in compliance with ADEM ARBCA, number of monitoring intervals proposed as adequate to make determinations, and how proposed monitoring intervals can be changed as determined by the Alabama Surface Mining Commission.
18. The report states that "However, if monitoring has not been terminated prior to mining activities reaching the location of M11-H-257, and all previous samples have been below RSLs, monitoring for phenols and formaldehyde will terminate once the monitoring well is mined thru. MW-H-257, will be replaced and monitored in accordance with the current Hydrologic Monitoring Plan, in its approximate location, after final grading and reclamation is done inside that area." The report should specify a minimum and maximum timeframe for terminating groundwater monitoring and after final grading and reclamation is complete inside this area. In addition, the report should include a timeframe for when the well will be replaced and monitored in accordance with the current Hydrologic Monitoring Plan.
19. As previously stated, groundwater flow and direction is unknown at the site; therefore, a set timeframe required to identify the presence of COCs in groundwater from mining activities cannot be determined and/or identified based on previous and/or proposed sampling strategies. It is also unknown if COC detection may occur and/or have the potential to migrate to receiving stream surface water and/or sediment within any defined timeframe associated with potential pathways such as soil leachate to groundwater, groundwater flow across the site, and/or hydrologic interaction with receiving stream surface water.
20. The report states that "Once the contaminated soil area has been properly delineated (both horizontally and vertically), a volume of contaminated overburden will be calculated from the horizontal and vertical extents of the contaminate." The report does not include adequate information or detail of how COC concentrations and/or distribution in a specific volume of overburden material will be approximated based on proposed and/or previous sampling and analysis related to mining cuts.
21. The report does not include information regarding how proposed "determinations" will be made in compliance with the site ADEM NPDES Permit. Any determination of proposed sampling strategy, implementation schedule, and/or deviations from proposed activities must be made in collaboration with ADEM in compliance with existing and proposed changes to this site's regulatory permit requirements and compliance.

22. The required setback area indicated on the site sampling map is included proposed mining cut areas for no. 2-7, 2-8, 2-9, and 2-10. By definition, the setback area should not be included in any area or cut proposed to be part of mining activities.

Report Remediation

23. The proposed location of the Special Overburden Remediation Area and containment basin 006 for construction of a containment cell for contaminated overburden material is at the site permit boundary adjacent to the stream buffer area. A proposed contingency plan to prevent containment breach or overflow from reaching the receiving stream, soil, and/or or groundwater at this location should be included in the report.
24. The report should include information and specifications regarding the tarp proposed for placement over the contaminated soil during rainfall events to prevent saturation and potential surface run off such as tarp size, material, placement, anchoring, and efficacy for prevention of saturation and potential surface run off as compared to other feasible prevention measures.
25. The report should include the process and timeline proposed for placing the tarp during rainfall events such as monitoring rainfall potential; the rainfall amount and timeframe that would trigger the tarp placement; inspection interval of tarp placement during a rainfall event; and monitoring tarp runoff and saturation of contaminated soil before, during, and after a rainfall event.
26. In the event erosion and/or runoff associated with the overburden pile occur in the containment cell, the report should include information and details regarding proposed drainage of the containment cell to sediment basin 006 including: timeframe for grab sample testing of water in the containment cell, water quantity that would trigger sampling and drainage of the containment cell, and quantity of water that sediment basin 006 can accommodate.
27. A single grab sample of containment cell water is not adequate to determine potential contamination of surface water horizontal and vertical profile for a specific volume of water. An assessment of potential water contamination based on sample analysis results to determine adequacy to drain to sediment basin 006 should be detailed in the report.
28. The report should include information and specifications for sediment basin 006 regarding a maximum quantity of water that can be stored in a given time period. A proposed contingency plan to remove water from the containment cell in excess of sediment basin 006 capacity, removal of excess contaminated water in the containment cell that cannot be transferred to sediment basin 006, and the potential for exceeding anticipated time limits and sample analysis requirements of overburden material and/or water prior to safe removal, transfer, and/or discharge to the receiving stream.
29. The report should include information, procedures, timeframes, details, specifications, potential locations, storage conditions, containment material management and prevention of erosion and/or water runoff with regards to construction of other "Special Overburden Remediation Areas" if needed.
30. The setback area for the storage location of excess spoil fill (presumably for overburden material deemed not contaminated) is not adequate around the entire perimeter as depicted on the report map. In addition, the report does not include information or specifications regarding storage quantity, time limits, containment measures, location(s) for storage of excess material, and removal, transport, and disposition of overburden material.
31. The report should include adequate information or specifications of containment cell construction timeframe; efficacy of proposed retention lining and berm; feasibility of alternate containment methods, retention lining, and berm specifications; and inspection and maintenance procedures during and after construction.
32. The report should include identification of what qualifies as "best non-toxic, non-acid material available on site" for berm construction, a contingency process in the event onsite material quantity is insufficient for berm construction, and feasible alternatives to using onsite material.
33. The report should include information or specifications regarding a proposed method to compact, measure, inspect, and monitor 95% material compaction in a manner adequate for the berm's stated purpose.

34. The report should include information regarding the adequacy of reliance on planted seed growth to stabilize the berm's surface, the type of vegetation proposed to be adequate, origin of proposed vegetative seed, consideration of native vegetation species, process and timeframe for seed plantation, growth inspection and measurement requirements, vegetation inspection and maintenance specifications, and/or frequency of seed plantation to maintain adequate berm stabilization.
35. The report should include information or procedures regarding continual maintenance of 18 inches of wet storage and freeboard in the containment cell including storage volume measurement frequency; inspection of volume before, during, and after a rainfall event; removal of contaminated rainfall in excess of storage volume; and/or contingency plan in the event storage volume is exceeded during a rainfall event.
36. The report proposes that remediation of contaminated soil in the containment cell be performed by passive evaporation and confirmed by analysis of a composite sample of overburden soil. Additional details and specifications proposed for composite sampling of overburden material should be provided including composite sample size and number required per volume of soil adequate to characterize soil contamination, location and distribution of soil sampling within the pile considered representative of a composite sample, sample collection and analysis procedures, COCs and analysis methodologies proposed, and certified laboratory proposed for analysis.
37. The report should include details regarding proposed screening RSLs for approval, proposed specifications to be considered evidence of "a vast reduction" of contamination, procedures for approval and removal of material for offsite disposal, proposed certified vendor and procedures for transport of materials to an approved disposal site in accordance with applicable safety and transportation regulatory requirements, documentation of compliance, transportation manifest certifications and handling, documentation provided to the Alabama Surface Commission and ADEM, and compliance inspection and monitoring proposed by Mays Mine, Inc. in coordination with the Alabama Surface Commission and ADEM.
38. The report should include information and details regarding feasible remedial alternatives to passive evaporation.

General Observations

1. The report should address protection of receiving stream from other water quality impairment that may result from mining activities such as total dissolved solids (TDS) from erosion and/or surface water runoff.
2. 2017 preliminary assessment sampling analysis demonstrated COC concentrations above ADEM screening RSLs for multi-use property designation that have not been adequately addressed for further investigation to date.
3. First quarter Year 2022 site inspections by the Alabama Surface Commission and ADEM of site activities and best management practices in compliance with Permit Number P-3957 and Permit Number AL0079936, respectively, have resulted in Notice of Violations (NOVs) as recent as February 2022. NOVs were issues for failure to submit groundwater and surface water data for sediment basins, stream monitoring sites, and groundwater wells and discharge monitoring reports, wetland disturbance and pipe discharge, silt fencing location and maintenance practices, berm construction and stabilization measures, evidence of erosion at silt fence locations, failure to provide updates on certification and construction of stream outfalls, failure to maintain onsite records and documentation, and in stream sedimentation accumulation.
4. NOVs related to current permit requirements and stream protection measures indicate similar issues are likely to occur with regards to proposed overburden handling related to mining activities in currently restricted areas of the site. In addition, protection measures proposed are similar to current permit requirements and proposed on a larger scale to protect the receiving stream from potential COC contamination in addition to soil erosion and surface water runoff stream impairments.

Summary and Conclusion

In addition to inadequacies highlighted in review of the 2017 preliminary assessment report, compounded by results and assessment findings noncompliance with regulatory guidance, the proposed overburden handling report reliance on a previous assessments compounds uncertainties, assumptions, and conclusions associated with this plan. A full characterization of the site, in alignment with previous comments on the 2017 preliminary assessment, is needed prior

to provision of proposed sound, scientific, and regulatory compliant overburden handling for consideration of modifying current permit restrictions regarding mining activities in this area.

The overburden report does not include short- and long-term monitoring of COCs in relation to protection of receiving stream water quality. This report does not include adequate technical information or specifications regarding overburden site storage, prevention of contamination, and/or remediation measures for contaminated overburden material.

As both the Alabama Surface Commission and ADEM may be aware, BWW recently received unverified communications from site neighbors and other concerned parties that mining activities may be currently taking place in restricted areas of the site proposed for permit modification. BWW has had no site access or verification of these potential concerns which would be in violation of Alabama Surface Commission and ADEM permit restrictions. We are requesting the ASMC to investigate this claim and determine if Mays Mining, Inc. is in compliance with their current permit.

Please email me at Jeffrey.Thompson@bwwb.org or call 205-244-4403 if you have any questions or comments.

Sincerely,



Jeffrey F. Thompson
Assistant General Manager – Operations & Technical Services

cc: Michael Johnson, MBA, CPA
Jarrod Shotts, MSEM, CESCO