M E M O R A N D U M

DATE: September 29, 2011

TO: Richard D. Garrity, Ph.D.

FROM: Jeff Sims **Thru:** Diana M. Lee, P.E.
Sterlin K. Woodard, P.E.

SUBJECT: FINAL Construction Permit No. 0571406-003-AC
Virginia Materials, Inc. dba Opta Minerals – Tampa

Attached is FINAL Permit No. 0571406-003-AC being issued to Virginia Materials, Inc. dba Opta Minerals – Tampa for the addition of a vertical shaft impact (VSI) crusher at the existing abrasive blast media drying, screening and loadout facility. The facility is located at 3401 East 3rd Avenue, Tampa, FL 33605.

The facility receives various types of raw blasting media including slag (copper, nickel, and coal) and minerals (garnet and staurolite) by truck. The material is dried and then screened to various sizes. The undersize and oversize products are currently collected in the by-product bunker and shipped off-site as needed. The desired product sizes are conveyed to one of three enclosed storage silos which each store only specific sized material (i.e. Coarse (EG12), Fine (EG20), or Combination (EG14)). From the silos, the screened material is routed to either the truck loadout conveyor for bulk truck loading or the bagging operations inside the building. The raw material handling prior to the dryer is controlled by water sprays, and the material handling from the dryer to truck loadout or bagging is controlled by an external Flex Kleen baghouse or the building enclosure with internal baghouse.

This project is for the addition of an electrically-driven VSI crusher to the processing line directly after the screener. In response to a market demand for increased quantities of a smaller (finer) material, the facility proposes to install a crusher, so it can recover the oversized material previously unused after the screener and produce more Fine Product. If needed, Course Product could also be directed to the VSI crusher to generate more Fine Product. The crusher is an enclosed unit and approximately 6’ in diameter and 5’ in height. An internal impeller rotating at high speeds projects the material against the lined walls where the impact causes fracture and ultimately size reduction. From the crusher, the material will travel through a new enclosed elevator back up to the entrance to the screener where it is sized again. Particulate matter emissions from the VSI crusher and new elevator will be controlled by the existing external baghouse. Pickup points will be located at the base of the crusher and at the top and bottom of the new elevator.

Since the new crusher and elevator will be controlled by the existing external baghouse and there was no request for a throughput increase, there is no increase in potential emissions for this project. The crusher will be included as part of Emission Unit No. 002 - *Aggregate Drying/Screening/Storage/South Truck Loadout (with Baghouse)*. The potential emissions for particulate matter for the facility were estimated at 23.6 ton/yr and remain unchanged from the current operating permit.

The facility is subject to Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (RACT) for Particulate Matter (pursuant to Chapter 1-3.51, Rules of the EPC) and Chapter 1-3.52, Rules of the EPC, which limit the opacity to 5% on all the facility operations. The project is not subject to the requirements of 40 CFR 60 – Subpart OOO *(Standards of Performance for Nonmetallic Mineral Processing Plants)* or Subpart LL— *(Standards of Performance for Metallic Mineral Processing Plants)* because the materials being processed do not fall under the definition of nonmetallic minerals as stated in 40 CFR 60.671 and the facility does not meet the definition of metallic mineral processing plant specified in 40 CFR 60.381. Initial visible emission tests will be required on the crusher and the external baghouse while the crusher is in operation, and annual tests on the external operations will remain a requirement thereafter.

Since there are no changes to the overall emissions, both emission units at the facility are reflected in this permit; however, the only testing requirements specified for this construction permit are for the new crusher. The remaining testing requirements must continue as stated in the current operating permit.

The DRAFT construction permit was issued on September 7, 2011 and the Notice of Intent to Issue an Air Construction Permit was published in the September 14, 2011 issue of the St. Petersburg Times. No public comments on the DRAFT air construction permit have been received to date.

Based on our review, we recommend issuance of the permit as drafted.

JDS: 0571406-003-AC

FINAL DETERMINATION

FOR

Virginia Materials, Inc. dba Opta Minerals – Tampa

Hillsborough County

Construction Permit

Application Number

0571406-003-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

September 29, 2011

The Environmental Protection Commission of Hillsborough County mailed a public notice package on September 7, 2011 that included the Notice of Intent to Issue Air Construction Permit No. 0571406-003-AC to Virginia Materials, Inc. dba Opta Minerals – Tampa located at 3401 East 3rd Avenue, Tampa, FL 33605. The air construction permit was issued for the addition of a vertical shaft impact (VSI) crusher at the existing abrasive blast media drying, screening and loadout facility.

The Public Notice of Intent to Issue was published in the St. Petersburg Times on September 14, 2011.

COMMENTS/CHANGES

No comments were received by the Environmental Protection Commission of Hillsborough County from the public on the DRAFT construction permit.

CONCLUSION

The final action of the Environmental Protection Commission of Hillsborough County is to issue the FINAL construction permit as attached.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

David Rumble
Vice President/General Manager
Opta Minerals, Inc.
47 Morton Avenue East
Brantford, Ontario Canada N3R7J5

Dear Mr. Rumble: Re: Hillsborough County - AP

Enclosed is Permit Number 0571406-003-AC for the construction of a vertical shaft impact (VSI) crusher at the existing abrasive blast media drying, screening and loadout facility located at 3401 East 3rd Avenue, Tampa, Hillsborough County, FL, 33605, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Drive, Tampa, Florida 33619; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/JDS/jds

cc: Florida Department of Environmental Protection – via email
Tom T. John, P.E, Tom John, P.E., Inc. – via email

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed or hand-delivered to the facility before the close of business on _____ .

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statues, with the clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

PERMITTEE:	PERMIT/CERTIFICATION
Virginia Materials, Inc. dba Opta Minerals – Tampa	Permit No.: 0571406-003-AC
47 Morton Avenue East	County: Hillsborough
Brantford, Ontario Canada N3R7J5	Expiration Date: October 31, 2012
	Project: Addition of New Crusher

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the EPC and made a part hereof and specifically described as follows:

This permit authorizes the construction of a vertical shaft impact (VSI) crusher at the existing abrasive blast media drying, screening and loadout facility. The facility dries and screens various types of materials for loadout as abrasive blasting material. An electrically-powered VSI crusher is being added following the screener in order to produce more Fine Product and recover the oversized material previously unused after the screener. If needed, Course Product from the screener could also be directed to the crusher to generate more Fine Product. The VSI crusher is an enclosed unit and approximately 6' in diameter and 5' in height.

Material will be fed into the top of the crusher where the particle sizes will be reduced. From the crusher, the material will travel through a new enclosed elevator back up to the entrance to the screener where it is sized again. Particulate matter emissions from the VSI crusher and new elevator will be controlled by the existing external baghouse. Pickup points will be located at the base of the crusher and at the top and bottom of the new elevator. Initial visible emission tests will be required on the crusher and the external baghouse while the crusher is in operation, and annual tests on the external operations will remain a requirement thereafter.

Existing Facility Operation

The facility receives various types of raw blasting media including slag (copper, nickel, and coal) and minerals (garnet and staurolite) by truck, and stores the raw materials in an outside storage area on the north side of the existing building. The storage area has water sprays to control emissions generated from handling the products. A front-end loader transfers the raw material from the outside storage area to the raw feed hoppers. From the raw feed hoppers, the material is conveyed to an open raw feed conveyor to an inclined concurrent-flow dryer (Hauch Burner Model #PBG5000B) in order to reduce the moisture content of the abrasive material. The dryer is rated at 4.66 MMBtu/hr and primarily intended to run on natural gas, although back-up use of diesel fuel or propane is permitted. Once the material passes through the enclosed end of the dryer, it is transferred through an enclosed screen feed elevator that delivers the product to an electrically-powered enclosed vibratory screener.

The screener splits the dried product into various size fractions: undersize, oversize, Coarse Product (EG12), and Combination Products (EG14 or EG20). The undersize and oversize products are currently collected on a covered by-product conveyor and transferred to the covered by-product bunker fitted with water sprays. Water sprays are required to be operated on the by-product conveyor to control emissions from the handling of the dried products. The by-product material is currently disposed of off-site through a licensed agent. The EG12 is transferred through an enclosed coarse product elevator to Silo #12. The EG14 and EG20 are transferred through an enclosed combination product elevator to either Silo #13 or Silo #14. Also present on the existing site from a previous operation is a truck/railcar unloading area leading to an elevator; however, this area is inactive and not intended to be used as part of Virginia Materials' operation.

The material is collected from the base of the silos with an enclosed conveyor and then delivered to an enclosed elevator. From the elevator, the product either enters the building through discharge pipes and is directed to the inside product bunkers, or the product is discharged onto the enclosed south truck loadout conveyor. The south truck loadout conveyor feeds a loading spout that fits into the access port on the enclosed trucks. The south loadout area includes a scale and is intended to be the primary loadout option. The materials in the bunkers inside the building are removed via front-end loaders as desired and placed into the interior elevator feed hopper. The interior elevator directs the material to either a smaller (50/100 lb) bagger, a larger (3000 lb) super sack bagger, or to the north truck loadout discharge pipe.

The north truck loadout is located outside the building and will load trucks in a similar manner to the south side, but it is intended to be a back-up system in the event that the south truck loadout is inoperable. The emissions from the baggers and the north truck loadout are controlled by the internal baghouse which vents indoors. The bagged material is palletized and stored inside the building for shipment. Also present in the building is a sample screener used to prepare small samples for client evaluation. The screener is loaded by filling a feed container at ground level and placing the container on top of the screener.

Particulate matter emissions from the dryer, screen feed elevator, external screener, dried product elevators, silos, silo recovery elevator, and south truck loadout are controlled by a Flex-Kleen baghouse with a design flow rate of 20,000 acfm utilizing Nomex bags. The material collected by the baghouse is periodically loaded from the collection bin into the by-product bunker, which is fitted with water sprays. The raw feed bins, raw feed hopper, and raw feed conveyor are controlled by water sprays or the moisture content of processed materials. The interior elevator, small bagger, large bagger feed hopper, and north truck loadout are controlled by an internal baghouse estimated at 7,000 acfm. The exhaust from the internal baghouse is vented inside the building. The remaining internal operations (internal storage bunkers, elevator feed hopper, large bagger, and sample screener) are controlled by the building enclosure.

The facility has been identified by two emission units: 1) Aggregate Receiving/Outdoor Storage/North Truck Loadout; 2) Aggregate Drying/Screening/Storage/South Truck Loadout (controlled by an external baghouse). The internal operations were determined to be exempt based on the building enclosure and since the internal baghouse vents inside the building.

The facility is subject to Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (RACT) Particulate Matter (pursuant to Chapter 1-3.51, Rules of the EPC) and Chapter 1-3.52, Rules of the EPC, which limit the opacity to 5% on all the facility operations.

Location: 3401 East 3rd Avenue, Tampa, Hillsborough County, FL

UTM: 17- 360.18E and 3093.25N

Facility ID No.: 0571406

Emission Units Nos.:

Emission Unit (EU) No.	**Description**
001	**Aggregate Receiving/Outdoor Storage/North Truck Loadout**
Emission Point 1	Truck to Storage Bin
Emission Point 2	Front End Loader to Raw Feed Hopper
Emission Point 3	Raw Feed Conveyor
Emission Point 4	By-Product Conveyor to By-Product Bunker
Emission Point 5	North Truck Loadout
002	**Aggregate Drying/Screening/Crushing/Storage/South Truck Loadout (with Baghouse)**
Emission Point 1	Dryer
Emission Point 2	South Truck Loadout
Emission Point 3	Crusher

References Permit No.: 0571406-002-AO

Replaces Permit No.: N/A

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]

2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

4. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

5. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

6. As requested by the permittee, in order to limit the potential to emit for particulate matter emissions from the Aggregate Drying/Screening/Crushing/Storage/South Truck Loadout (EU 002), the permittee shall not cause, permit, or allow emissions of particulate matter in excess of 0.03 gr/dscf or to exceed 9.9 tons in any 12 consecutive month period. [Rules 62-212.300, 62-210.200, 62-296.711(2)(b), 62-296.712(2) and 62-4.070(3), F.A.C.; Permit No. 0571406-001-AC; and Construction Permit Application Received August 8, 2011]

7. As requested by the permittee, in order to limit the potential to emit for Hazardous Air Pollutants (HAP), the HAP, as defined in Rule 62-210.200, F.A.C., emissions shall be less than 10 tons for any individual HAP and less than 25 tons for any combination of HAPs in any 12 consecutive month period. [Rules 62-212.300, 62-210.200, and 62-4.070(3), F.A.C. and Permit No. 0571406-001-AC]

8. The permittee shall not cause, permit, or allow any visible emissions greater than five percent opacity from any portion of the aggregate handling and processing operations (EUs 001 and 002). [Rules 62-296.711(2)(a) and 62-296.712(2), F.A.C., and Chapter 1-3.52(2), Rules of the EPC]

9. In order to ensure compliance with the emission limitations in Specific Condition Nos. 6 and 8, the following restrictions and limitations shall apply to the aggregate handling and processing operations: [Rule 62-4.070(3), F.A.C.; Permit No. 0571406-001-AC; and Construction Permit Application Received August 8, 2011]

A) The maximum throughput rate of all types of aggregate/blast media combined shall not

SPECIFIC CONDITIONS:

exceed 100,000 tons/twelve consecutive month period.

B) The hours of operation for the aggregate processing operations (i.e. drying and screening operations) shall not exceed 4,000 hours per twelve consecutive month period.

C) The permittee shall only process metallic slag (copper or nickel), minerals (garnet or staurolite), or coal slag.

D) The dryer shall only be fired on natural gas, propane, or diesel fuel.

E) The heat input rate of the dryer burner shall not exceed 4.66 MMBtu/hour.

F) The external baghouse shall be in operation whenever the aggregate handling and processing operations (i.e. dryer, screener, crusher, silo loading, reclaim elevator, south truck loadout, etc.) are active.

G) The north truck loadout shall be vented to the internal baghouse.

H) The permittee shall only loadout to enclosed trucks at the truck loadout stations.

I) All raw aggregate loaded into the raw feed hopper prior to the dryer shall be adequately moist to ensure compliance with the opacity standards.

J) Water sprays shall be in operation on the by-product (fines, oversized material) conveyor whenever the screen is in operation. Water sprays on the by-product storage bunker shall be used as necessary to ensure compliance with opacity standards. Tarps shall be used to cover the outside storage bunkers when not in use.

10. In order to ensure that the internal aggregate handling operations (i.e. bagging, sample screening, storage, etc.) continues to qualify for an exemption from air permitting pursuant to Rule 62-210.300(3)(b), F.A.C., the following restrictions and limitations shall apply: [Rule 62-210.300(3)(b), F.A.C.]

A) The exhaust from the internal baghouse shall be vented into the building.

B) The building shall enclose all internal operations as described in the application.

11. The permittee shall perform a visible emissions test on both the new crusher <u>and</u> the external baghouse exhaust (while the crusher is in operation) within 30 days following the initial processing of blast media through the crusher, and annually thereafter. However, based on observation of the crusher process following construction and the results of the initial tests, Emission Point No. 3 from EU002 may be re-evaluated and may not be required to conduct an annual visible emissions test in the future. The permittee shall continue testing on each of the remaining emission points in EU 001 and EU 002, including the external baghouse exhaust, for visible emissions annually (once per Federal Fiscal Year (FFY) in accordance with Specific Condition No. 11 of Permit No. 0571406-002-AO. The permittee shall also test the north truck loadout (EU 001) for visible emissions in accordance with Specific Condition No. 12 of Permit No. 0571406-002-AO if it initiates operation. Particulate matter testing of the external baghouse may be required if the EPC has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that the applicable standard is being violated. Submit two copies of the test data to the Air Management Division within 45 days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297, F.A.C. [Rules 62-297.310(7)(a)4., 297.310(8)(b), 62-297.620(4), 62-296.711(3)(c), and 62-296.712(3)(c), F.A.C.]

SPECIFIC CONDITIONS:

12. Compliance with the emission limitations of the Specific Conditions Nos. 6 and 8 shall be determined using EPA Methods 1, 2, 3, 4, 5 and 9 contained in Rule 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rule 62-297.310, F.A.C.]

13. Testing of emissions shall be conducted with the source (i.e. crusher and associated equipment) operating at capacity. Capacity is defined as 90-100% of rated capacity of processing 25 tons/hour of aggregate through the aggregate handling and processing operations and the crusher processing material at its maximum process rate. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than 15 fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. The test report shall include actual operating conditions such as the baghouse operating parameters, the airflow rate and pressure drop, and the material throughput rates. Failure to submit this information may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

14. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rules 62-297.310(7)(a)9., F.A.C.]

15. The baghouse shall have a device capable of monitoring the pressure differential across the external baghouse. The monitoring device shall be maintained in working order and shall be calibrated and adjusted to indicate the true value of the pressure drop with sufficient accuracy to allow the pressure drop to be determined within 10% of its true value. [Rules 62-4.070(3) and 62-297.310(5)(a) and (b), F.A.C.]

16. In order to demonstrate compliance with the limits established in Specific Condition Nos. 6 and 9, the permittee shall maintain records for the most recent three year period. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state and federal officials upon request and shall include, but are not limited to, the following: [Rules 62-4.160(14)(b) and 62-4.070(3), F.A.C.]

A) Day, Month, Year
B) The monthly amount of aggregate processed through the dryer/screener (tons)
C) The monthly hours of operation of the dryer and the baghouse
D) Rolling twelve consecutive month totals of B) and C) above

SPECIFIC CONDITIONS:

17. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

18. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not limited to, the following: [Rule 62-296.320(4)(c), F.A.C.]

A) Paving and maintenance of roads, parking areas and yards.
B) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stockpiles and similar activities.
C) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
D) Use of coverings or enclosures, as necessary.
E) Clean up spills promptly.
F) Keep the warehouse doors near the interior processing area closed as much as practical to minimize emissions outside the building.

19. If necessary, the permittee shall update the Operation and Maintenance (O&M) Plan attached to the current operating permit based on any changes that may occur as a result of this project, and submit the updated O&M Plan with the air operation permit revision application. [Rule 62-296.700(6), F.A.C.]

20. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(205), F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to the following, and may also require prior authorization before implementation: [Rule 62-210.300 and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment or major component of such equipment listed in the Process Description of this permit.
B) Installation or addition of any equipment which is a source of air pollution.
C) The drying or processing of any other type of material than those allowed by this permit
D) The use of materials or fuels other than those allowed by this permit.

21. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-

SPECIFIC CONDITIONS:

296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b), F.A.C.]

22. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

23. The permittee must submit to the Environmental Protection Commission of Hillsborough County each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1 of the following year. [Rule 62-210.370(3), F.A.C.]

24. A minimum of two copies of an air operating permit application, including an updated version Operation and Maintenance (O&M) Plan for the external baghouse if necessary, shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of completion of the initial compliance testing on the crusher or at least 90 days prior to the expiration date of this permit, whichever occurs first. [Rules 62-4.050(2), 62-4.090, 62-296.700(6), F.A.C.]

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.
Executive Director