COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
BOARD OF REGISTRATION OF
HAZARDOUS WASTE SITE CLEANUP PROFESSIONALS

In the Matter of:	
James J. Decoulos, Respondent	Docket No.: LSP-10AP-01

AFFIDAVIT OF JOHN FITZGERALD

I, John Fitzgerald, under the pains and penalties of perjury, state that I am the John Fitzgerald whose prepared direct testimony is attached to this affidavit. I further state that, if asked the questions contained in the text of such testimony, I would give the answers that are set forth in the text of such testimony. I adopt the aforesaid answers as my direct testimony in this proceeding.

Signed under the pains and penalties of perjury this 25th day of August, 2010.

John Fitzgerald

Exhibit B-8

COMMONWEALTH OF MASSACHUSETTS
BOARD OF REGISTRATION OF HAZARDOUS WASTE SITE CLEANUP PROFESSIONALS
before the
OFFICE OF APPEALS AND DISPUTE RESOLUTION

In the Matter of James J. Decoulos **Docket No. 10 AP 01**

Prepared Direct Testimony of
John Fitzgerald
Witness in support of the Initial Determination of the Board of Registration of Hazardous Waste Site Cleanup Professionals

Q. Please state your name and business address.

A. My name is John Fitzgerald and my business address is the Department of Environmental Protection, Northeast Regional Office, 205B Lowell Street, Wilmington, MA 01887.

Q. By whom are you employed?

A. I am employed by the Massachusetts Department of Environmental Protection ("DEP") as an Environmental Engineer. I have been in my current position since 2006. I have worked at DEP since 1980, and have focused on the assessment and cleanup of contaminated sites since 1981. In that time period, I have been involved in the development and/or review of most regulatory and technical work products issued by the agency in the area of waste site cleanup. I am a co-author of the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000), and the author of a number of DEP technical guidance documents. In my career, I have also reviewed assessment and remediation reports for well over 1000 sites.

Q. Are you sponsoring any exhibits in addition to your direct testimony?

A. Yes. I am sponsoring Exhibits B-9 through B-12.

Q. Please describe your educational and professional background prior to your current position at DEP.

A. I received a BS degree in Civil Engineering from the University of Massachusetts Lowell in 1979, and an MS degree in Civil Engineering from the University of Massachusetts Lowell in 1987. As part of my graduate studies, I completed a research project and thesis on the testing of petroleum contaminated soils using a jar headspace technique and Photoionization Detector ("PID"). This research has been referenced and used by a number of regulatory agencies in the United States and Canada, and was the basis of the DEP Jar Headspace Procedure, which I developed in the late 1980s.

Please see my attached resume, Exhibit B-9, for additional details regarding my educational and professional background**.**

Q. Please describe your job duties in your position as an Environmental Engineer in the Northeast Regional Office.

A. Reporting directly to the Regional Director, I work on complex cases and projects, on both a regional and state-wide scale. For the last several years, I have devoted a significant amount of time and effort to develop and lead the department's "Field Assessment and Support Team" (FAST), a multi-disciplinary group of agency

scientists and engineers that respond 24/7 to major oil/chemical spills and/or pollution events.

Distinct from my operational role and experience is my work on Bureau of Waste Site Cleanup ("BWSC") technical initiatives and guidance documents, which started in 1991 with my authorship of *Policy for the Investigation, Assessment, and Remediation of Petroleum Releases* (DEP Publication #WSC-401-91). In 1995, I co-authored two draft publications: *Method for the Determination of Volatile Petroleum Hydrocarbons* and *Method for the Determination of Extractable Petroleum Hydrocarbons*, which were later revised and issued as final methods in January 1998. In 1996, I was the co-author of *An Evaluation of Vapor Intrusion into Buildings Through the Study of Field Data*, which has been cited nationally, and significantly influenced subsequent agency regulations and publications relating to the vapor intrusion pathway, including the 2002 Final Policy document, *Characterizing Risks Posed by Petroleum Contaminated Sites: Implementation of the MADEP VPH/EPH Approach ("2002 Final VPH/EPH Policy")*.

Q. Please describe the 2001 draft document entitled "Characterizing Risks posed by Petroleum Contaminated Sites: Implementation of MADEP VPH/EPH Approach, Final Draft, June 2001," also known as the "2001 Final Draft VPH/EPH Policy."

A. This document, which was issued in June 2001, was an update of a draft document issued in 1997, and precursor to the "Final Policy" issued on October 31, 2002. A copy of the 2001 Final Draft VPH/EPH Policy is attached as Exhibit B-10. This policy provides guidance on how to use and apply a new approach and set of cleanup standards developed by DEP to characterize risks posed by releases of petroleum products to the

environment. This approach is based upon the evaluation of collective ranges of aliphatic and aromatic hydrocarbons, using analytical methods developed by DEP that quantitate Volatile Petroleum Hydrocarbons ("VPH") and Extractable Petroleum Hydrocarbons ("EPH").

The Policy provides a comprehensive overview of the theory and application of the DEP approach, which has subsequently been used, in whole or part, by a number of other states, EPA Regional offices, as well as internationally. In addition to providing guidance on the unique toxicological and analytical concepts embodied in the DEP approach, the document also provides significant guidance and "Rules of Thumb" on site assessment procedures, including the investigation and assessment of vapor intrusion pathways.

Q. What was your role in developing the 2001 Final Draft VPH/EPH Policy?

A. I developed and authored the 2001 Final Draft VPH/EPH Policy.

Q. Is Exhibit B-11 an accurate copy of MCP sections 310 CMR 40.0191, 40.0904, 40.0926, 40.0973, 40.0982-40.0983, 40.0986 and 40.1003 that were in effect from 10/29/1999 until 6/27/2003, during which Mr. Decoulos submitted his June 14, 2002 RAO opinion on behalf of Speedy Lube, Inc.?

A. Yes.

Q. What, if any documents have you reviewed in developing your testimony?

A. I have reviewed "Response Action Outcome, Prepared for: Speedy Lube, Inc., 633 North Main Street, Randolph, MA, Prepared by: Decoulos & Company, Date: June 14, 2002," Exhibit B-55, and the document by the same name dated June 18, 2004, Exhibit B-58, and associated documentation.

Q. What was your overall opinion on the scope and conclusions of the 2002 RAO report?

A. Insufficient assessment was conducted to adequately determine the nature and extent of groundwater and soil gas contamination. The limited data that were obtained were unclearly and improperly evaluated, in a manner contrary to the requirements of the MCP, and in a manner inconsistent with cited DEP guidance documents.

Insufficient detail was provided in the RAO report, which preferably should be a "stand alone" document, but must at least provide specific references from previous or other reports if needed to support conclusions and opinions.

Finally, insufficient discussion and justification was provided on important assessment components and conclusions. Misstatements and inappropriate actions suggest a lack of understanding of important scientific principles and regulatory provisions, and/or lack of sufficient diligence.

Q. Do you believe that potential source areas of contamination were properly indentified and evaluated?

A. No. There is inadequate discussion and consideration of potential petroleum release sources in the RAO Report. Mention is made of three underground storage tanks that were removed from the site in 1997, which triggered a release reporting obligation under the MCP. However, there is no information on where these tanks were located, or the nature or apparent extent of encountered contamination. As such, it is not possible to ascertain whether the number and placement of groundwater wells and soil gas monitoring probes is adequate. However, it is noted that there is no groundwater quality data directly north of the current 12,000 gallon underground storage tank (UST), between the UST and the nearby on-site building, even though the report concludes that groundwater flow is to the north. Moreover, there is no groundwater data east of the UST, toward residential buildings, even though there is a possibility that groundwater flow is in this direction.

Q. Do you believe that groundwater flow direction was adequately established?

A. No. The RAO concluded that groundwater flow was towards the north/northwest, based upon measurements of groundwater elevation in four wells (DMW-1 through DMW-4). Even though these wells were sampled on a number of occasions by Decoulos and Company, groundwater elevation measurements were made only one time, on 5/10/02.

These four wells are not located in optimal locations to make conclusions on flow direction (i.e., they are not in a triangular pattern). Given the head measurements provided, it is possible to draw groundwater table contours that show a flow direction to the northeast – toward Orchard Street and residential structures. On the basis of regional topography, the site appears to be on a surface water divide, with flow potentially towards the west, north, or east. This suggests that groundwater flow in any of these directions would not be unexpected. Moreover, and as noted in the RAO document(s), "local groundwater flow direction will likely be influenced by surface and subsurface structures and utilities in and adjacent to the site".

Given such site and topographical complexities, along with limitations in spatial and temporal head measurements, insufficient documentation is provided in the RAO report to determine the groundwater flow direction. Ambiguities in this regard are particularly problematic at this site, given the lack of any groundwater quality data easterly/northeasterly of two possible sources of gasoline releases at the site (i.e., the 12,000 gallon underground storage tank and pump island).

Figures in the reports identify additional monitoring wells (e.g., MW-1 through MW-4), that were presumably installed in the past by another LSP. Perhaps data from these wells could help provide clarification in this matter. However, no such data were presented or discussed.

Q. In your opinion, was the possible presence of Light Non-Aqueous Phase Liquids (LNAPL) adequately evaluated?

A. No. The presence of subsurface LNAPL at petroleum sites is a major

concern, with respect to the mass of hydrocarbons present in the environment, as a source of groundwater contamination, and as a source of subsurface hydrocarbon vapors. Such concerns are presented and discussed in the 2001 Final Draft VPH/EPH Policy. However, on the basis of what is provided in the RAO reports, *it is not clear that LNAPL was ever looked for or evaluated by the LSP at this site*.

It appears that the only time the wells were gauged by the LSP was on 5/10/02, when an "Environmental Instruments groundwater interface probe" was used to measure the depth to groundwater. There is no indication that this probe could detect LNAPL, nor was any mention made of other identification techniques, such as the use of a bailer.

There are notations of a "slight sheen" on the water sampled from DMW-2 (on 5/10/02). However, it appears that all of the wells were sampled by use of a peristaltic pump and polyethylene tubing. There is no mention made of where the tubing was placed in the well/saturated zone, but it presumably was placed below the water table elevation. As such, it would not necessarily withdraw LNAPL even if it was present in the well. For each subsequent round of sampling, it appears that the polyethylene tubing in each well was sampled in a similar manner.

Q. Based upon your review of the 2002 RAO report, do you have any other concerns about the adequacy of site characterization data?

A. Yes. The RAO reports indicate that groundwater samples from the monitoring wells (DMW-1 through DMW-4; MW-3R) were filtered with a 0.45 micron filter. This was done because of the turbid nature of the groundwater samples; a problem generally attributable to poor well installation, development, and/or sampling procedures.

Data from samples obtained in such a manner may be biased low, and result in an under-quantification of risks. This concern is specifically addressed (in bold font) in the 2001 Final Draft VPH/EPH Policy, at the end of Section 5.1.3: "**Because of the potential to produce a false-negative/bias, all site investigations that rely upon data obtained from filtered groundwater samples must include an adequate discussion and justification for using such techniques**." No such discussion was provided in the RAO documents.

Q. Based on your review of Mr. Decoulos's 2002 RAO for the Randolph Site, did Mr. Decoulos rely upon the MassDEP guidance document, 2001 Final Draft VPH/EPH Policy relative to the risk characterization?

A. Statements were made in the report referencing use of the Final Draft, though in a number of cases the Policy was misapplied.

Q. Please Explain:

A. In addition to the previous discussion on LNAPL gauging and groundwater filtering, a major deviation from the policy is evident in the approach used to conduct the risk characterization. On page 15 of the 2002 RAO report, under "6.0 Risk Characterization", notation is made that the Method 2 characterization conducted for the site "included modification of selected Method 1 Standards according to procedures outlined in MADEP, Characterizing Risks posed by Petroleum Contaminated Sites: Implementation of MADEP VPH/EPH Approach, Final Draft, June, 2001." This

assertion was repeated in Section 6.8, though footnotes in Tables 4 and 5 referenced the earlier 1997 draft of this policy.

While the calculation of a modified GW-2 standard is allowed by the MCP, it is not addressed in any version of the VPH/EPH Policy. Specifically, per the MCP at 40.0982(3)(c) (Exhibit B-11): *"Site-specific information may be used to either modify the MCP Method 1 GW-2 Standards, which model potential volatilization of oil and/or hazardous material to indoor air, or to demonstrate that such vapor infiltration will not occur. The incorporation of such site-specific information will result in MCP Method 2 GW-2 Standards or a determination that one or more Method 1 GW-2 standard is not applicable at this site. These site-specific modifications are described in 310 CMR 40.0986*." The approach taken in the VPH/EPH policy concerns the latter of the two methodologies cited above, i.e., a demonstration that vapor infiltration will not occur.

Q. Are parties required to use and conform to DEP policies, such as the VPH/EPH policy?

A. No. Parties are not required to comply with any policy or technical guidance document issued by the agency. The MCP, which governs the cleanup of contaminated sites in Massachusetts, is a performance-based regulation. While the MCP sets standards for what must be done (e.g., evaluate all contaminant transport pathways and exposures), it doesn't "micro-manage" how to achieve the standard. Nevertheless, in recognition of the complexities of the site assessment process, DEP publishes guidance documents and policies that provide general education, as well as "one way" to achieve compliance with the broad MCP performance standards. These documents are developed

in consultation with the regulated and LSP communities (e.g., via workgroups and/or public comment processes), and as such typically receive wide acceptance and use.

While it is acceptable for an LSP to deviate from a recommended technique and practice, per 310 CMR 40.0191(2)(a), Exhibit B-11, it is unacceptable for a practicing LSP to be unaware of concepts and procedures presented in agency guidance documents. It is also unacceptable to assert or infer use of a policy, and then not follow its provisions as written.

Q. Does the 2001 Final Draft VPH/EPH Policy discuss recommended soil gas probe locations?

A. Yes. In Section 4.2.1.1. of the 2001 Final Draft, a recommendation is made to install at least one or two soil gas sampling probes beneath the building where vapor intrusion is of concern, e.g., through the concrete floor slab.

Q. Why are the locations of soil gas probes important to performing a Method 2 Risk Characterization?

A. The objective of such an assessment is to evaluate whether subsurface vapors are discharging into an overlying structure. The most direct and accurate means to evaluate such a concern is to determine the concentration of subsurface vapors immediately beneath the footprint of the structure of interest. This is optimal not only because of proximity, but also because negative pressure fields (which "pull" vapors into buildings) are strongest nearest the structure, and because the concentration of subsurface gases outside the footprint of the structure can be biased low, due to such factors as the

infiltration of rainfall and snowmelt, which can displace and re-solubilize volatile hydrocarbons present in pore spaces.

Q. Based on your review of Mr. Decoulos's 2002 RAO for the Randolph Site, were the soil gas probe locations consistent with the 2001 Final Draft VPH/EPH Policy or otherwise consistent with scientifically acceptable risk assessment practices?

A. No. At this site, the LSP chose to install soil gas probes outside of the structure, with no reason given as to why they could not have been installed within the building, and no discussion of potential negative biases.

Moreover, the 2001 Policy specified that "if probes cannot be installed within the footprint of the structure, install soil gas sampling probes along the perimeter of the building, as close as possible to the structure. Locations beneath pavement or other impervious surfaces are preferred to obtain representative conditions." Even if one assumes there was a valid reason why probes could not have been installed within the footprint of the structure, and while it appears that these probes were installed in paved areas, it is not clear why they were installed 5 to 10 feet from the building, rather than immediately proximate to the structure.

Q. Based on your review of Mr. Decoulos's 2002 RAO for the Randolph Site, did Mr. Decoulos assess risk via indoor air exposures relative to MTBE and benzene in a manner consistent with the MCP, the 2001 Final Draft VPH/EPH Policy, or scientifically acceptable risk assessment practices?

A. No.

Q. Please Explain.

A. As noted in the 2002 RAO report in Section 6.7.2, the Method 1 GW-2 standard for MtBE was exceeded in monitoring well DMW-4, and for Benzene in monitoring wells DMW-1 and MW-3R. Exceeding a Method 1 GW-2 concentration value indicates the potential for a vapor intrusion pathway, and mandates the use of a Method 2 or Method 3 risk characterization process.

Although it is difficult to understand and follow the material and thought-process presented in the Report, it appears that vapor intrusion concerns for these contaminants were not adequately evaluated because of a misunderstanding of toxicological concepts (MtBE) and MCP risk characterization procedures (Benzene).

With respect to MtBE, in Section 6.8.1 of the RAO report, a statement was made that "Air data is not currently available for characterizing site specific risks of exposure to MTBE using the Method 2 procedure. The risks associated with MTBE will be evaluated assumed (sic) to be incorporated into the C9-C10 Aromatic analysis."

This is an incorrect statement and unscientific approach, as inhalation toxicological data (e.g., Reference Concentration) was available for MtBE well before 2001. In fact, it was available in a document listed by Mr. Decoulos as a reference in the RAO report and in footnote one in Table 4: "Background Documentation for the Development of the MCP Numerical Standards", MADEP Bureau of Waste Site Cleanup and Office of Research and Standards, April, 1994. It is possible that the LSP was referring to the lack of indoor air "background" data for MtBE, which, at the time, was

true. However, this was (and remains) true of a number of indoor air contaminants, and does not justify the decision to "incorporate" MtBE into the C9-C10 Aromatic Hydrocarbon fraction. This suggests a lack of understanding and expertise in this area.

With respect to Benzene, it appears that a "site-wide" EPC value was calculated, in which lower concentrations of benzene in wells DMW-2, DMW-3, and DMW-4 were used to calculate an "average" concentration of 1877 µg/L, just below the 2000 µg/L GW-2 standard. This inference is based upon the "Average GW Results" presented in Table 4, and the lack of any other table or discussion that specifies groundwater EPCs. Such an approach would be in violation of the MCP, which specifies that, when using Method 1 or Method 2, EPCs must be developed for each individual monitoring well. This position was also clearly articulated in a DEP "Question and Answer" publication [Volume 1 Number 4, April-May 1994], attached as Exhibit B-12.

If in fact the LSP understood the EPC calculation rules, the omission of Benzene in the Method 2 risk characterization would represent a serious lack of diligence for this proven human carcinogen.

Q. Based on your review of the manner in which Mr. Decoulos obtained and used the soil gas data results in the Method 2 Risk Characterization, did he appropriately determine that a condition of "no significant risk existed" relative to possible indoor air exposure?

A. No.

Q. Please Explain:

A. Beyond the serious problems previously discussed for MtBE and Benzene, the evaluation conducted for C5-C8 Aliphatic and C9-C10 Aromatic Hydrocarbons is inconsistent with the 2001 Final Draft VPH/EPH Policy (specifically referenced in Section 6.8 of the RAO report to justify the evaluation) and a non-conservative/un-protective oversimplification of a complex phenomenon.

As before, it is difficult to follow what was actually done by the LSP. The only text in this regard is the two sentences contained in Section 6.8.1 of the RAO report: "Using the 'No Impact' concentrations for soil gas, we back-calculated to Method 2 GW2 Standards. For the contaminants of concern, the calculated Method 2 GW2 Standards were as follows:" A value of 2,331 µg/L was then indicated for C5-C8 Aliphatics, and 50,000 µg/L for C9-C10 Aromatics.

Table 4 of the 2002 RAO report provides some additional insights, in a few tabulated "calculated" values and 3 footnotes. Apparently, two approaches were used to calculate a site-specific modified GW-2 standard. In the first approach (footnote 2), notation is made to "*Assume gas transport coefficient = average gw concentration divided by average soil gas concentration. Multiply this coefficient by MADEP 'no impact' soil gas value to calculate Method 2 GW2 Standard. Then default to 50,000 ppb where calculated GW2 > 50,000 ppb"* This is a simple proportional analysis. Such an approach, which is not contained in the 2001 Final Draft VPH/EPH policy, fails to recognize the complexities and spatial/temporal variations and heterogeneities inherent in the characterization of subsurface hydrocarbon vapors.

The second "Calculated Method 2 Standard" in Table 4 is explained in footnote 3, referencing an equation from 310 CMR 40.0983(2)(C). Unfortunately, there is no

equation at 40.0983(2)(C); in fact, this section deals with GW-1 standards. It is surmised that the intended reference was 40.0983(3)(C), which, in 2002, contained the following equation: [OHM]gw = [OHM]air / (α * d * H * C). See Exhibit B-11.

Initially, it is noted that this equation, and 40.0983, concern the development of Method 2 Standards for chemicals that do not already have a Method 1 standard. That is not the case here, so, from a regulatory point of view, this approach is not valid. From a technical perspective, no details or justifications are provided on the inputted values for α, d, H, or C, so it is not possible to evaluate the correctness of the provided values. Based upon the range of values that should have been inputted, however, this calculated value appears to be inappropriate.

In summary, this section is difficult to follow, with a number of mis-statements and errors, and does not justify the conclusion that 50,000 µg/L of C5-C8 Aliphatics and 50,000 µg/L of C9-C10 Aromatic Hydrocarbons constitute a condition of No Significant Risk at this site.

Q. Based on your review of the 2002 RAO for the Randolph Site, did Mr. Decoulos correctly calculate the concentrations of groundwater contaminants at the discharge point to surface water and the site specific Method 2 GW-3 standards?

A. No. Insufficient detail is provided. There are tabulated "calculated conc." values in this regard in Table 5, with a reference to Figure 4-1 of the 1997 VPH/EPH draft policy. It is assumed the correct reference is Figure 4-2 of the 2001 Final Draft VPH/EPH policy. The table columns reference a travel distance of 900 feet, while an underlying statement references 1000 feet. Using either distance, it is unclear how the

"calculated conc." value was derived. In any event, the use of Figure 4-2 may be inappropriate, given the statement in Section 6.8.2 of the RAO report that suggested that the LSP evaluated groundwater transport to surface water "assuming that the groundwater is being 'short circuited' along a 15 inch reinforced concrete drain pipe". This is contrary to applicability criteria in Section 4.2.2 of the 2001 Final Draft VPH/EPH policy (page 31) that limited use of Figure 4-2 is to sites where "there is no 'short circuiting' of groundwater contaminants along preferred flow paths."

Q. Based on your review of the 2002 RAO for the Randolph Site, did Mr. Decoulos correctly determine that a condition of No Significant Risk existed relative to surface water exposure?

A. No, because of the lack of clarity and substantiation in the calculation of down-gradient groundwater concentration values, discussed above.

Q. Two rounds of groundwater samples were collected within four weeks of one another, the data for which had shown increasing levels of petroleum hydrocarbons and associated compounds. Does this data reveal the possibility that a source of contamination was yet to be eliminated or controlled?

A. Yes. Significant variability can occur in groundwater concentration data due to a variety of factors, including the presence of unmitigated source areas.

Q. Do you believe sufficient information existed to reasonably determine that the source of increasing contamination had been eliminated or controlled?

A. No. Recommendations were provided in the 2001 VPH/EPH policy on the degree of temporal groundwater monitoring in Table 4-14. For sites with gasoline contamination in a GW-2 area, a minimum of 2 to 3 quarterly (i.e., every 3 months) rounds of data are suggested, to adequately address such issues as source mitigation.

Q: Based on your review of Mr. Decoulos's 2002 RAO for the Randolph Site and your above stated testimony, do you believe Mr. Decoulos met the MCP requirements for a Response Action Outcome and Risk Characterization?

A. No, for all of the reasons discussed in my testimony.

Q. In his Answer to the LSP Board's Order to Show Cause (OTSC), relative to OTSC Paragraphs 98 and 99 and Paragraph 14 of Affirmative Defenses within the Response, Mr. Decoulos stated that his 2002 RAO Opinion was affirmed via the additional work done thereafter, further demonstrating that his conclusions in 2002 were appropriate and protective of public health, safety, welfare and the environment. You reviewed Mr. Decoulos's follow-up 2004 RAO, which included a description of Mr. Decoulos's additional work. Do you agree with his statement?

A. No. The additional data did not address most of the deficiencies discussed above in my Testimony. In the 2004 RAO, groundwater sampling results for several petroleum contaminants were decreasing but continued to exceed Method 1 GW-2 standards. The 2004 RAO repeated the errors described above in applying Method 2 risk characterization.

Q. Do you believe that either the 2002 or the follow-up 2004 RAO submitted by Mr. Decoulos followed the requirements and procedures set forth in applicable provisions of 310 CMR 40.0000 in such a manner as to show, "No Significant Risk?"

A. No, for the reasons discussed in my testimony.

Q. Does this conclude your testimony?

A. Yes

CERTIFICATE OF SERVICE

I hereby certify that on this date a true copy of the Direct Testimony of John Fitzgerald was served upon each party in this action by electronic mail, to the following address: jamesj@decoulos.com, and that by agreement, the Exhibits in this matter were served upon each party in this action by overnight mail for delivery to the following address:

James J. Decoulos, LSP
Decoulos & Company
185 Alewife Brook Parkway
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8/25/10
Date

Lynn Peterson Read
Lynn Peterson Read