

**SANDUSKY  
BROWNFIELDS COMMITTEE**

Meeting on 14-Apr-09

**Coal Tar Investigation Planning**

Meeting called to order at 3PM. Bob Haag stated that the purpose of this meeting was to begin planning for investigation to determine if the established coal tar plume is in the bedrock, or only in the surface fill. Bob stated that he hoped no one was planning for the meeting to be a discussion amongst the attendees as to whether we should do the investigation or not.

Kathie Mueller: Is it important that we know where the coal tar is?

Bob Haag: The committee has already agreed to do the investigation and the Commission has voted 4-3 to do the investigation. A meeting was held with Ruth Haag, Dan Kaman and Scott Schell where it was decided which consultant would do the investigation (between the two under contract, Malcolm Pirnie and Partners/Hull) It was determined that Partners had greater experience with this matter. Partners now has the task of establishing a sampling and analysis plan (SAP). Once they have the plan, they will execute the investigation according to that plan.

Joe Hayberger: Is Ohio EPA part of this investigation?

Bob Haag: Karla Auker (of the USEPA) spoke to Ohio EPA and asked them to be present.

Joe Hayberger: Who is Karla?

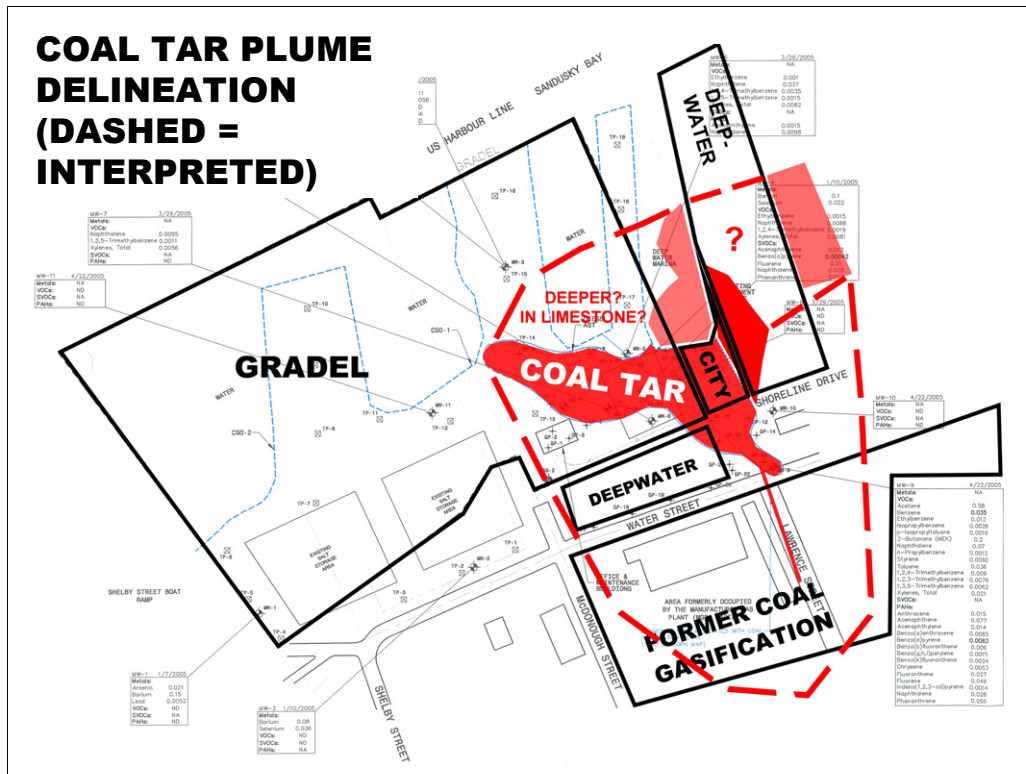
Bob Haag: The USEPA person who oversees this \$400,000 grant to investigate Brownfields. She is the agency boss on this project.

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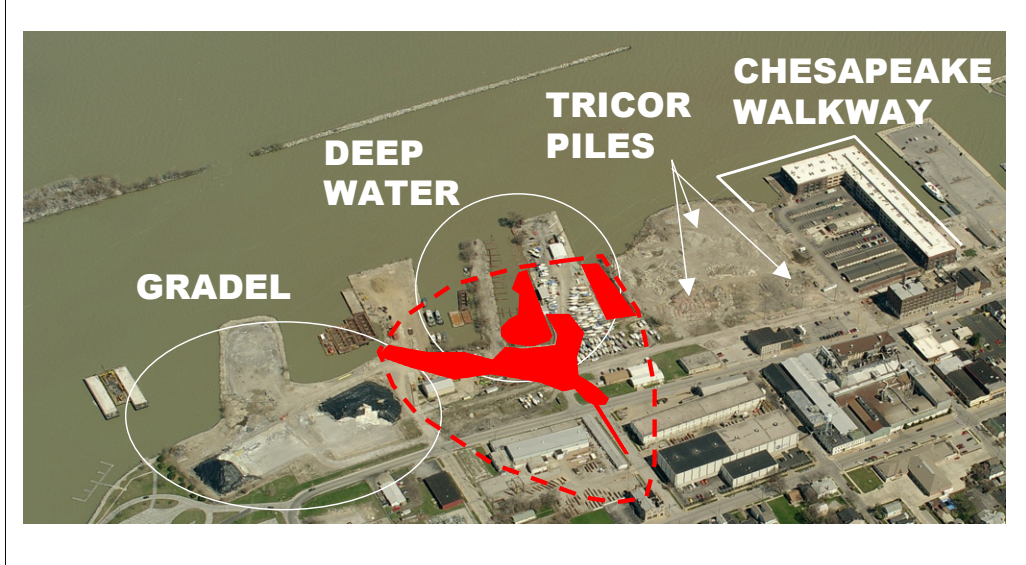
**Coal Tar Characteristics**





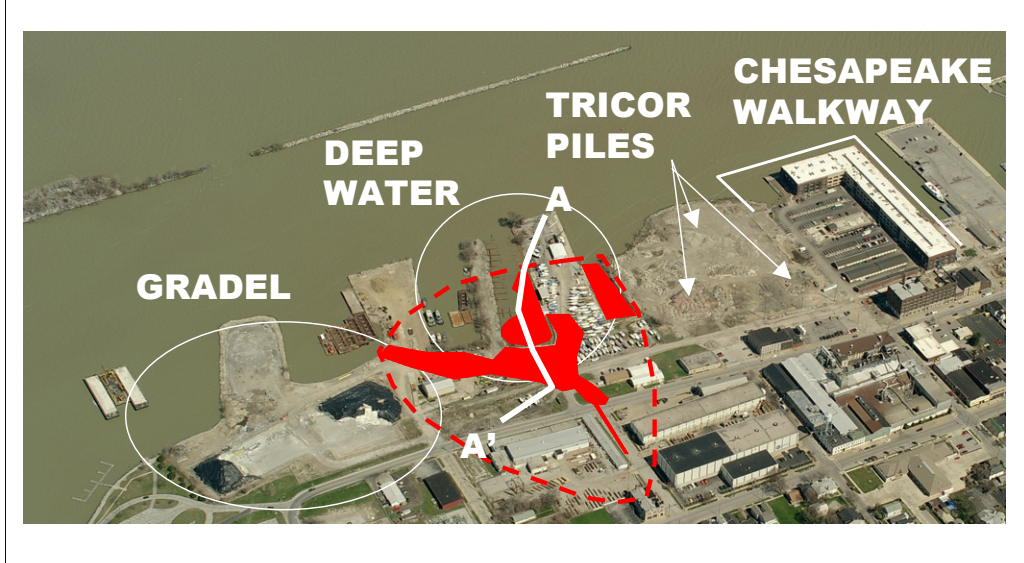
Bob Haag: Here is a rapid look at pictures that you have seen before, so you can start to visualize the coal tar plume. The dark area is where coal tar is documented, the dashed area is an area of interest.

## COAL TAR IN SANDUSKY'S PAPER DISTRICT



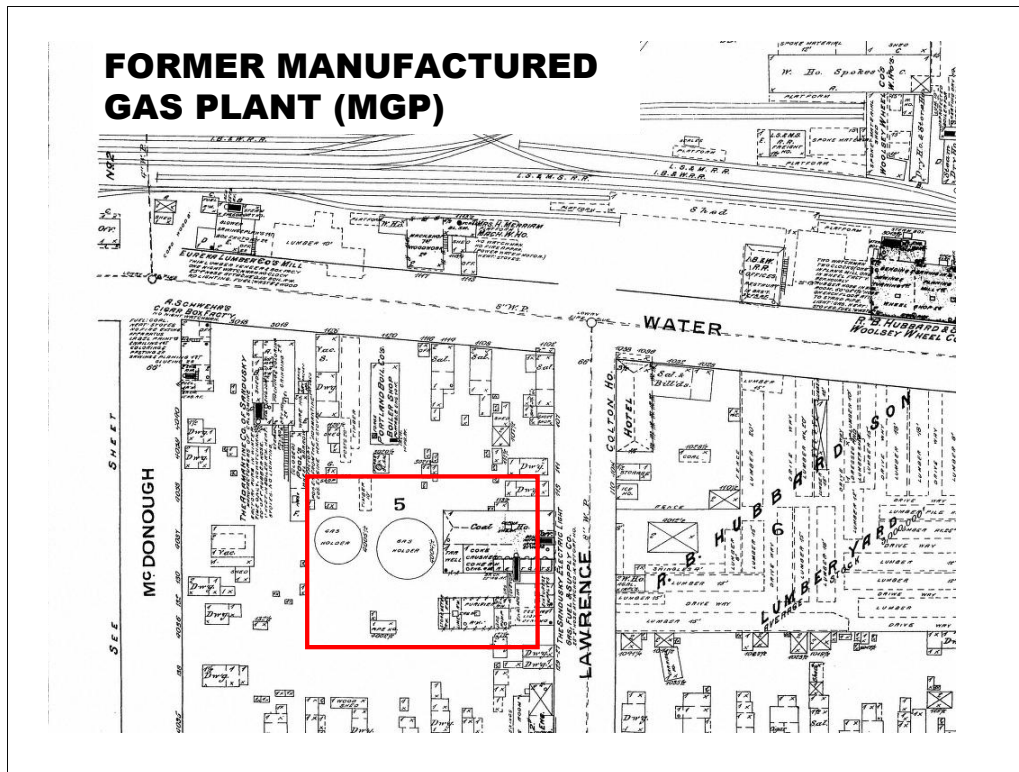
This is the same dashed outline plot on an air photo which shows Water street, Lawrence street and Shoreline Drive.

## COAL TAR IN SANDUSKY'S PAPER DISTRICT



This shows the location of a cross-section that was used before. The cross-section starts on Deep Water Marina property at A', goes across Gradel property, and then ends on the Deep Water pier, at A.





This shows a Sanborn Fire Insurance Map which details a tar well. The concern is that this might have been drilled 30' into bedrock and might have been a disposal site.

Dan Brown: Manufactured Gas Plant (MGP) sites were very common in the Midwest, there is lots of data out there. In early days in the 1880s coal tar which is a byproduct of MGP was a waste, so people wanted to get it out of the way because it was sticky and messy and hard to manage. Typically in an upland area a hole in the ground was created. If on a lake or river it was pumped to the lake or river. As time went by, coal tar began to have value and was not always considered to be a waste. So the manufacturers saved it and sold it. Dan presumes it had some sort of BTU value. Dan suggests that this would need more research. Dan suggests that the tar well might have been a temporary holding site for the tar. Dan suggests that we could determine if this was the case by looking at various maps to see when the tar well came into being. Dan suggested that the size, scale, depth and volume of the well are things that no one knows. Dan says he doesn't know what it would look like. From his research it was likely more of a storage vehicle, maybe brick-lined, cement-lined or a cavern.

Bob Haag: It will be Partners' responsibility to determine if they need to investigate that further.

John Lippus: Were these storage areas traditionally in the ground or above ground?

Bob Haag: I have never seen anything called a well that wasn't in the ground.

John Lippus: The reason he asked is that we don't see a mass near to the well.

Bob Haag: No one has investigated around the well.

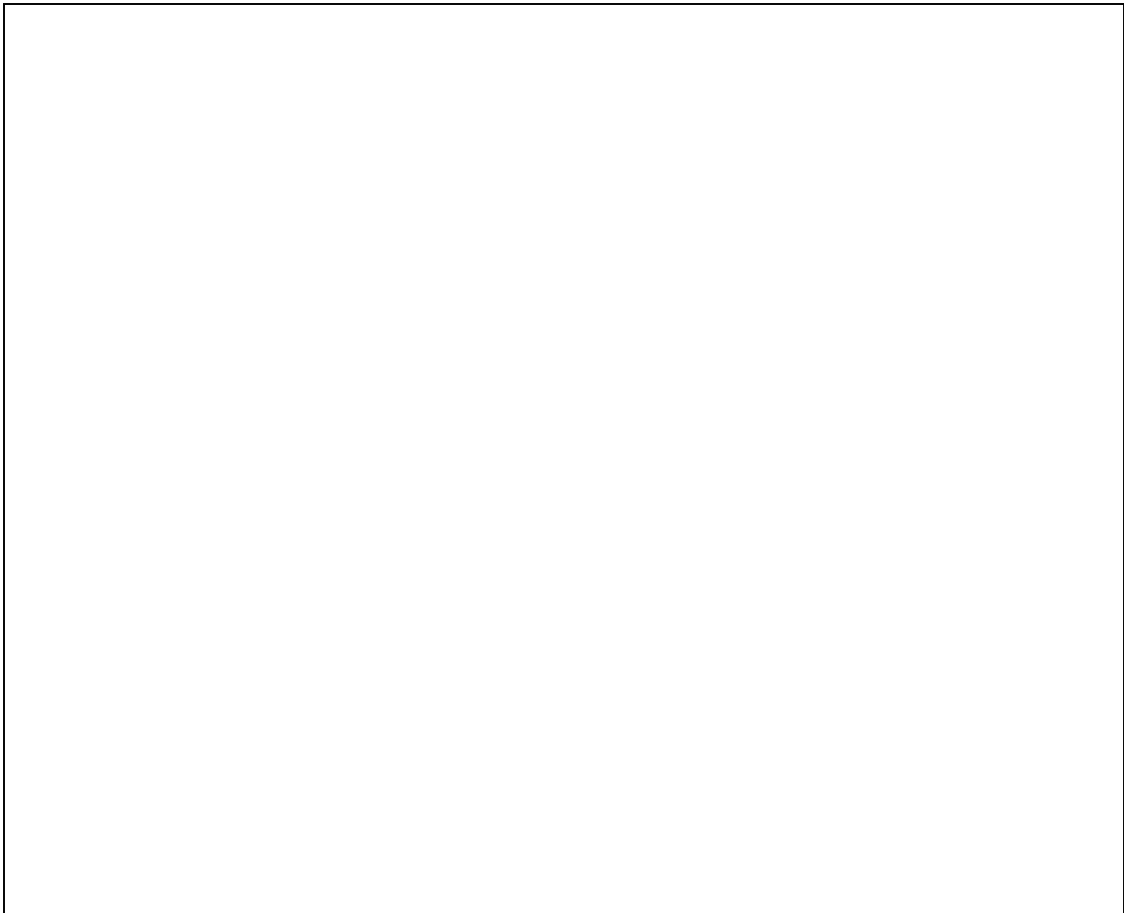
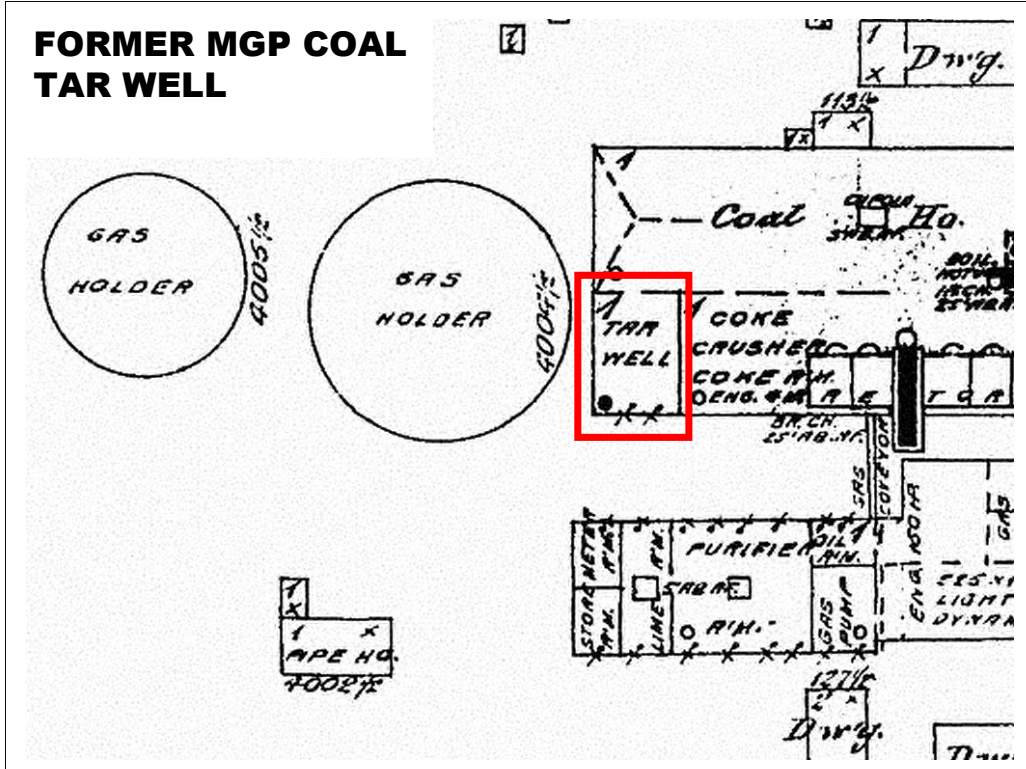
Karla Auker (USEPA): Can Dan explain the stratigraphy?

Bob Haag: I was going to do that.

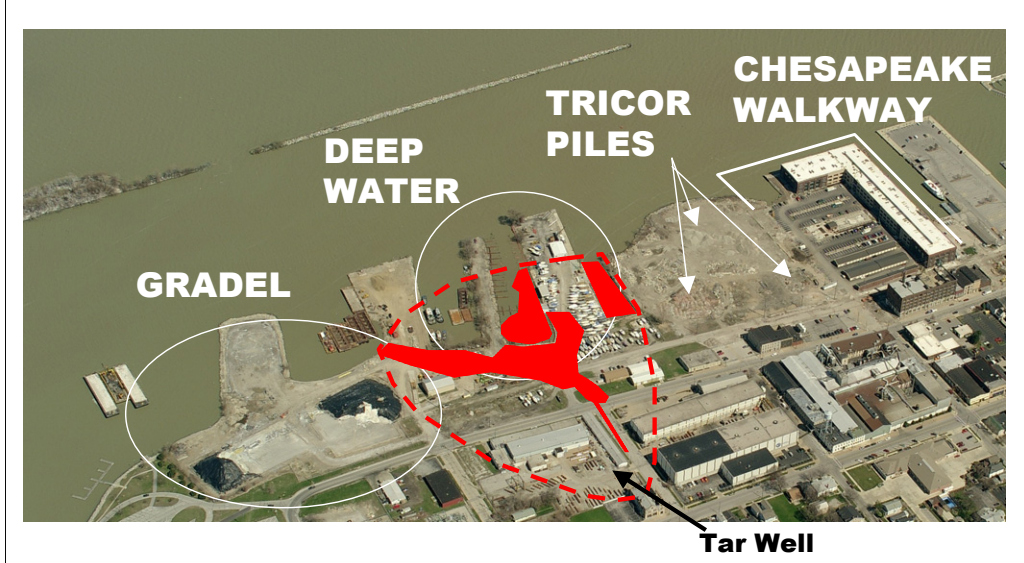
Dan Brown: Bob would know more about the stratigraphy from his study.

Dan Brown: I think that the tar well would be a shallow, small opening not blasted in. Each one was a different size, while modern USTs are pretty consistent. This was definitely below ground.

**FORMER MGP COAL  
TAR WELL**



## COAL TAR IN SANDUSKY'S PAPER DISTRICT

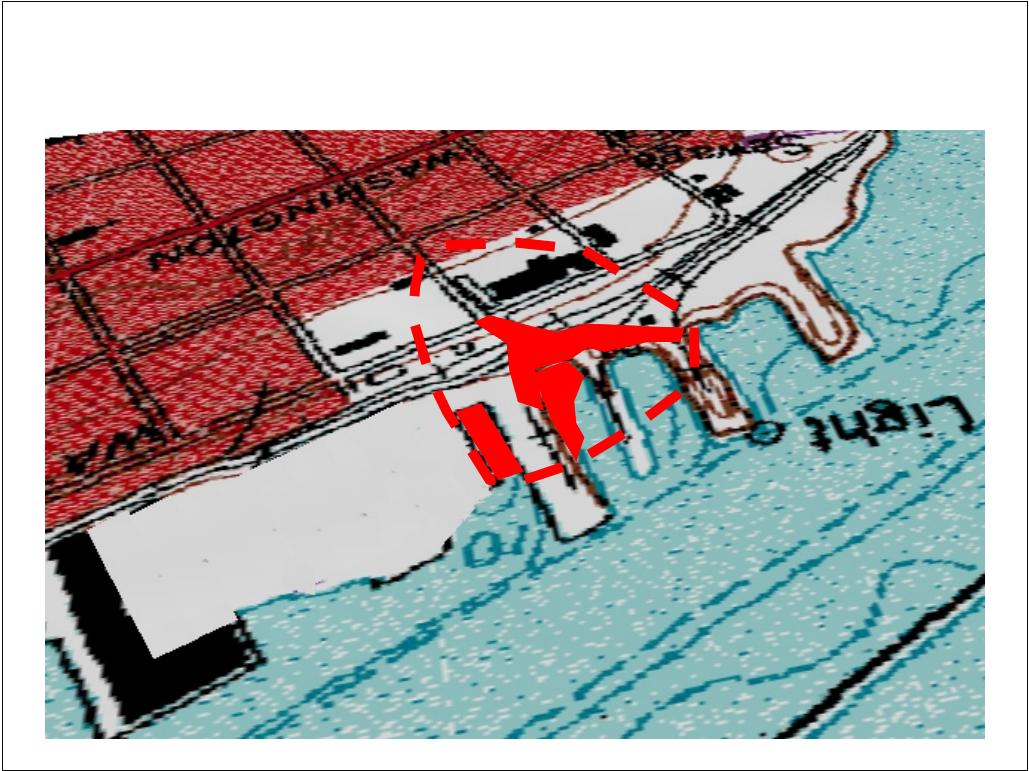


Dan Brown: Can you show where the tar well is on this map? Bob Haag pointed it out.

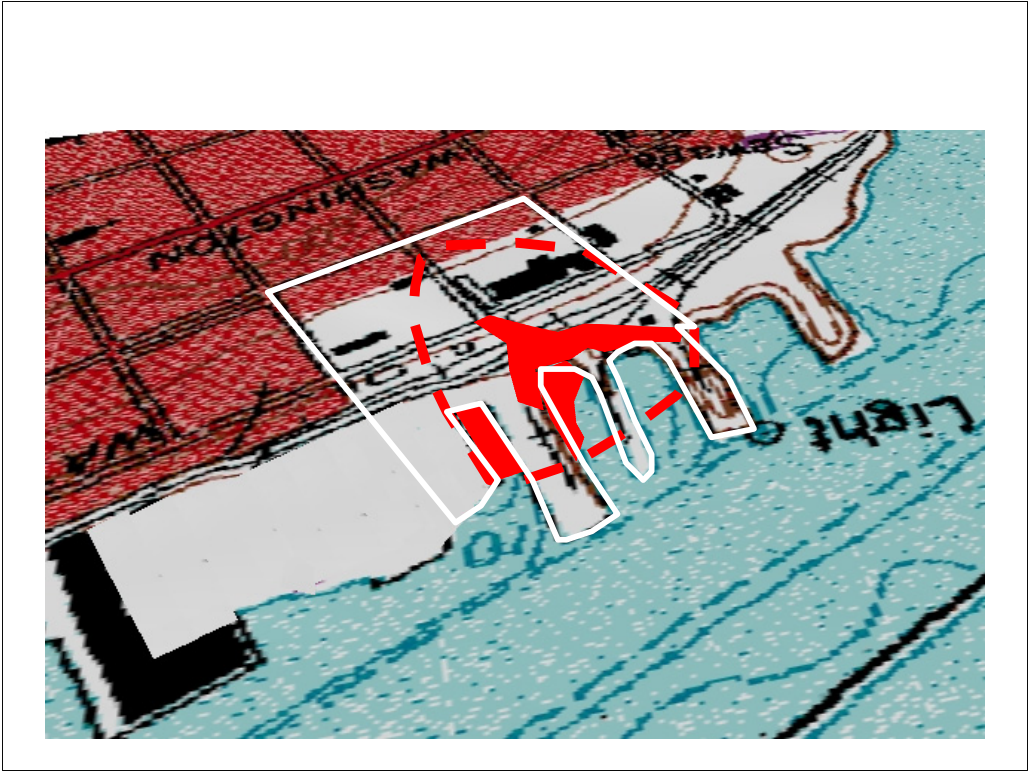
## COAL TAR IN SANDUSKY'S PAPER DISTRICT



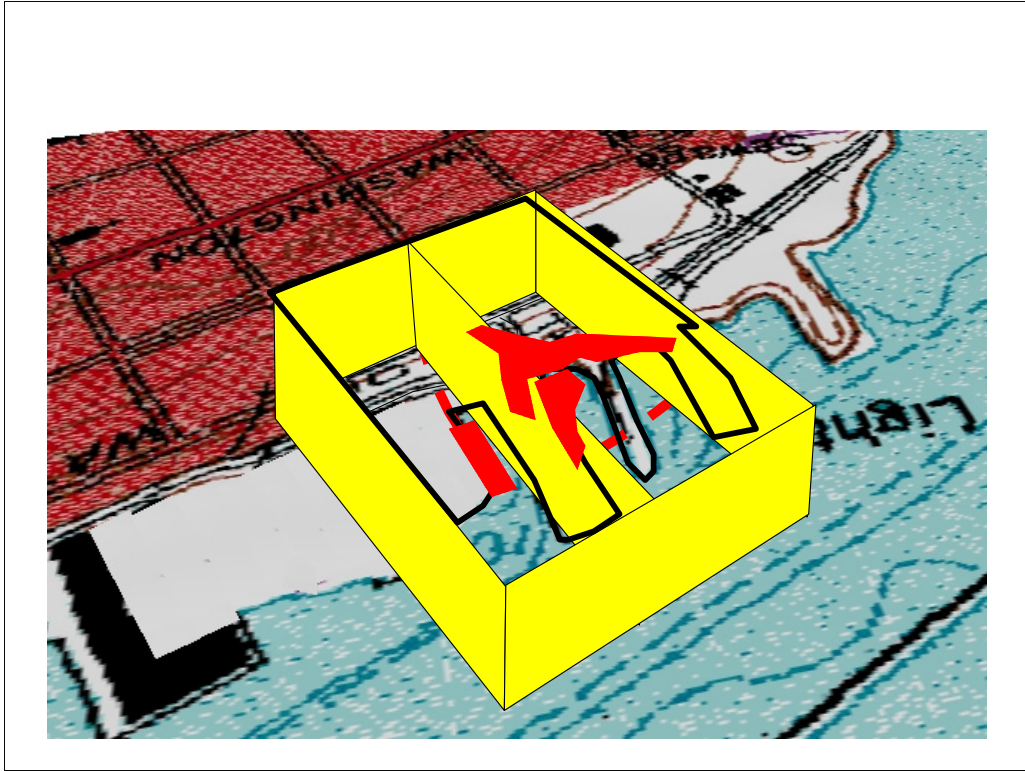
Here is another perspective on the interpreted plume.



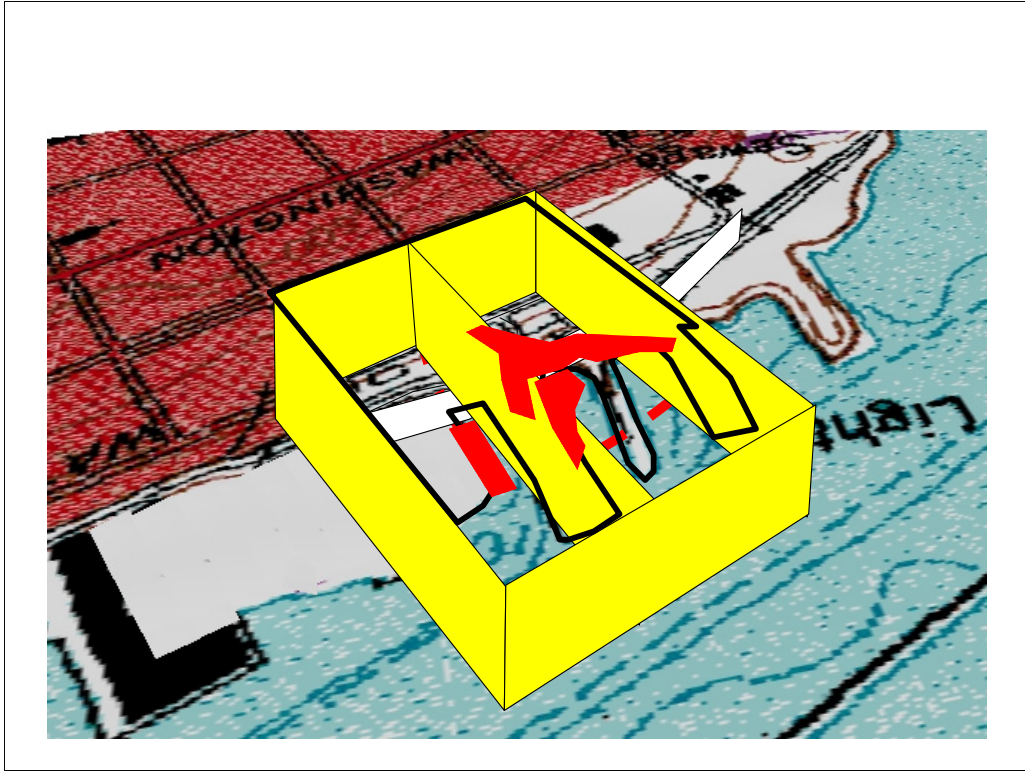
This picture will be used to create a block diagram.



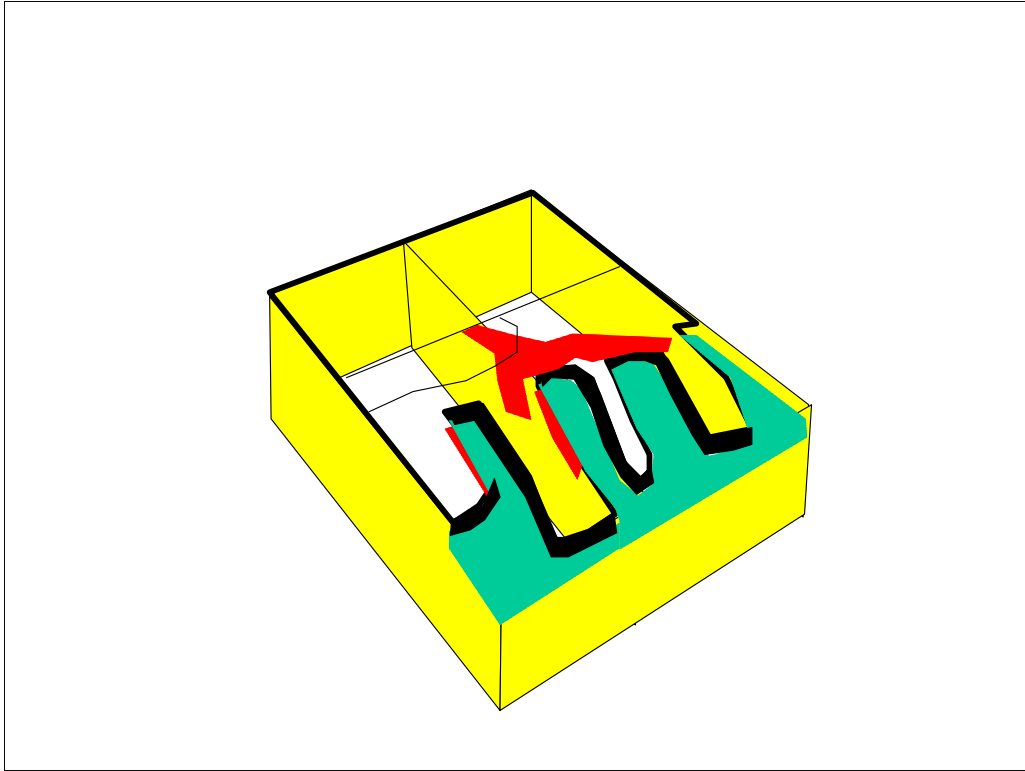
The block diagram will highlight these areas.



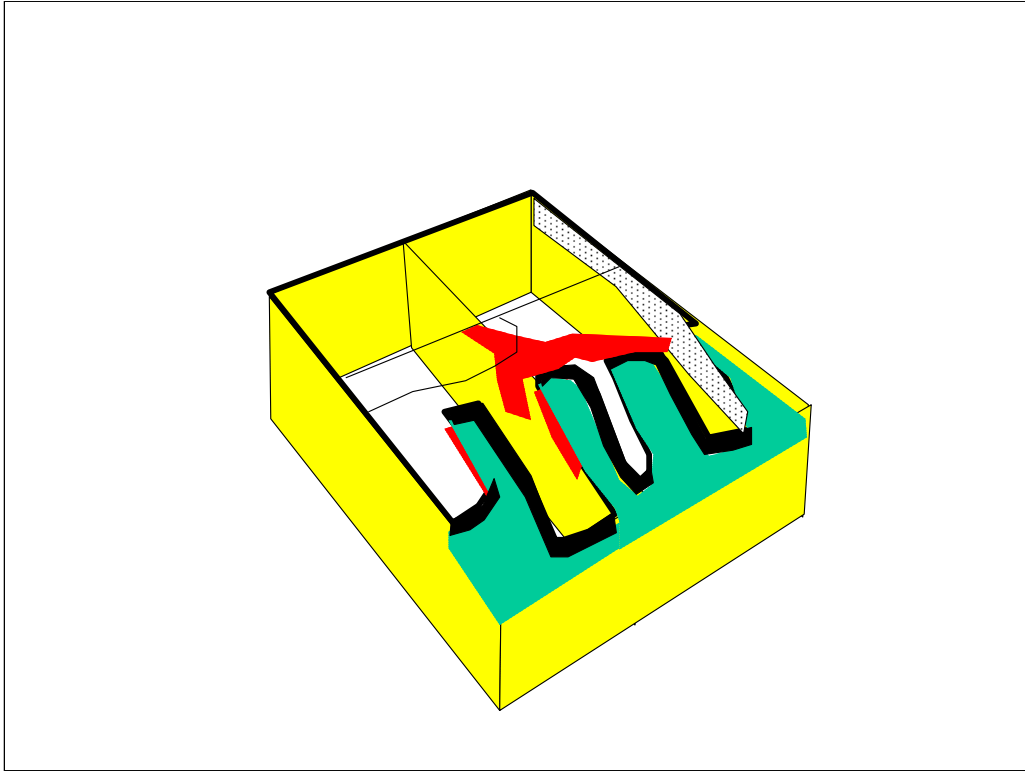
Here is the block diagram. There was an interceptor sewer constructed in 1957. Information that we are going to show is found in two books available in the Brownfield reading room. One book is a Clean Ohio Revitalization Fund (CORF) grant application prepared by Partners/Hull using Malcolm Pirnie data. The other book is a CORF grant application for Gradel, prepared by Partners/Hull with their own data.



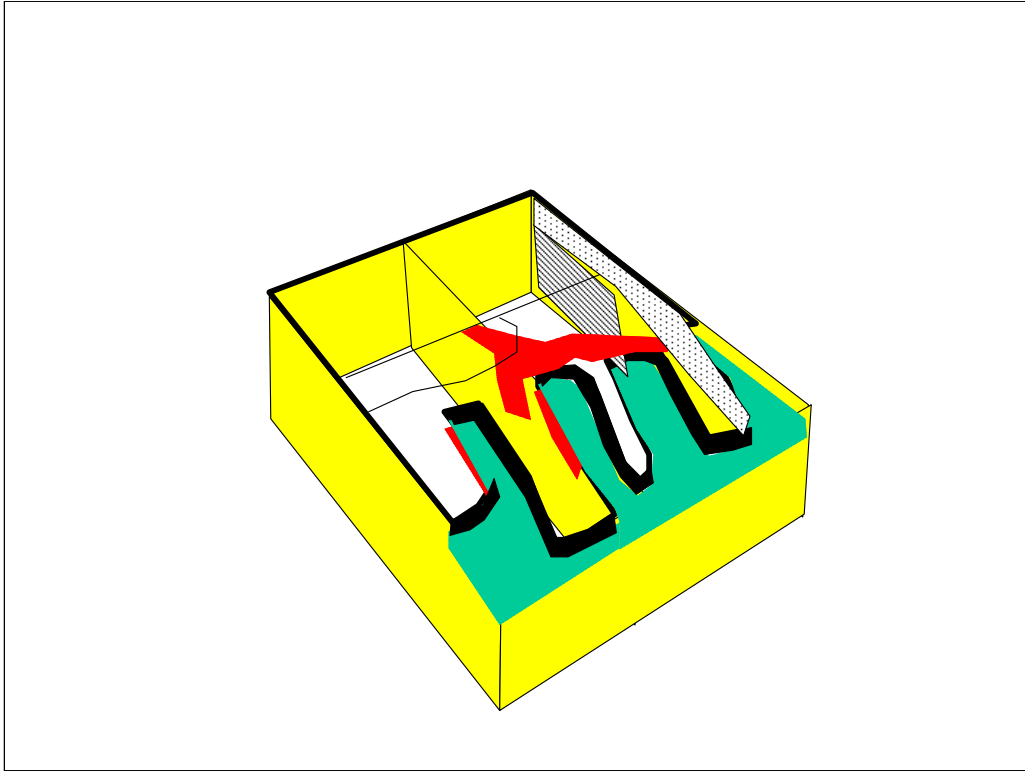
The interceptor sewer system installed in 1957.



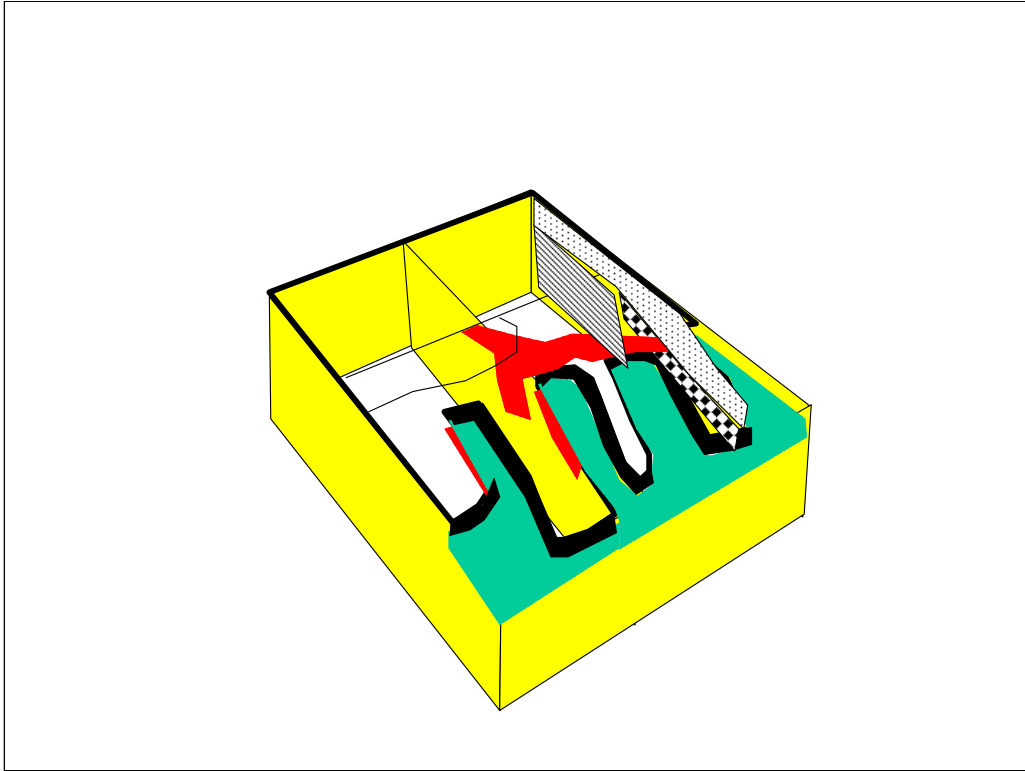
This shows Water Street, Shoreline Drive, and the Lawrence Street right of way. This shows how the coal tar contamination is under the water in the slips, and also underground, near the top of rock but not on the ground surface where we would get our feet sticky.



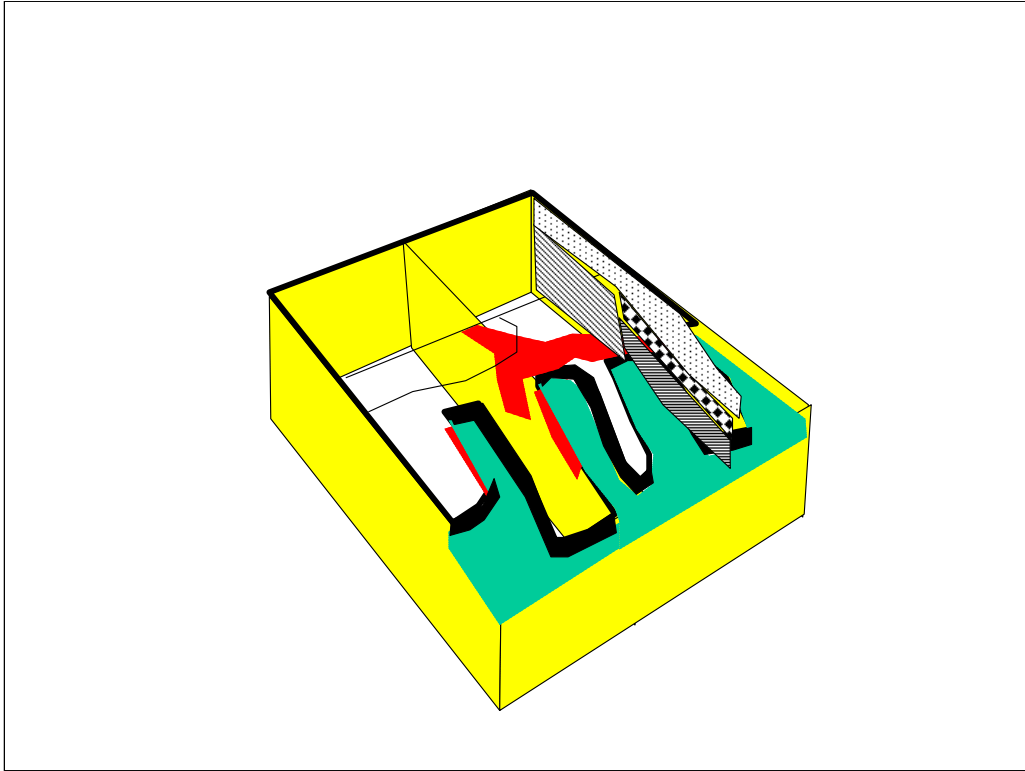
This is from a cross section prepared by Partners. This shows a sand fill, which Bob Haag has interpreted as extending out in the pier. [corrected]



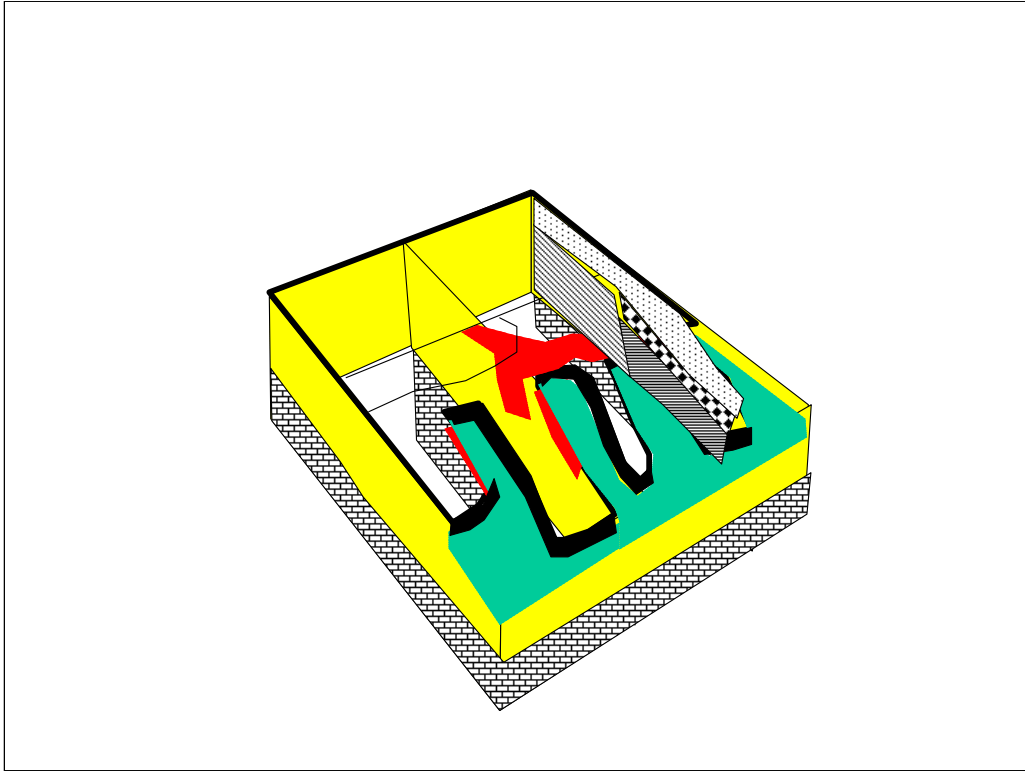
Here is the limestone [correction: actually silty clay], under the sand fill. Water Street was at the water line at the time, so the limestone [correction: silty clay] was at the water's edge.



This is a coarser fill under the sand fill, and abutting the limestone [correction: silty clay].

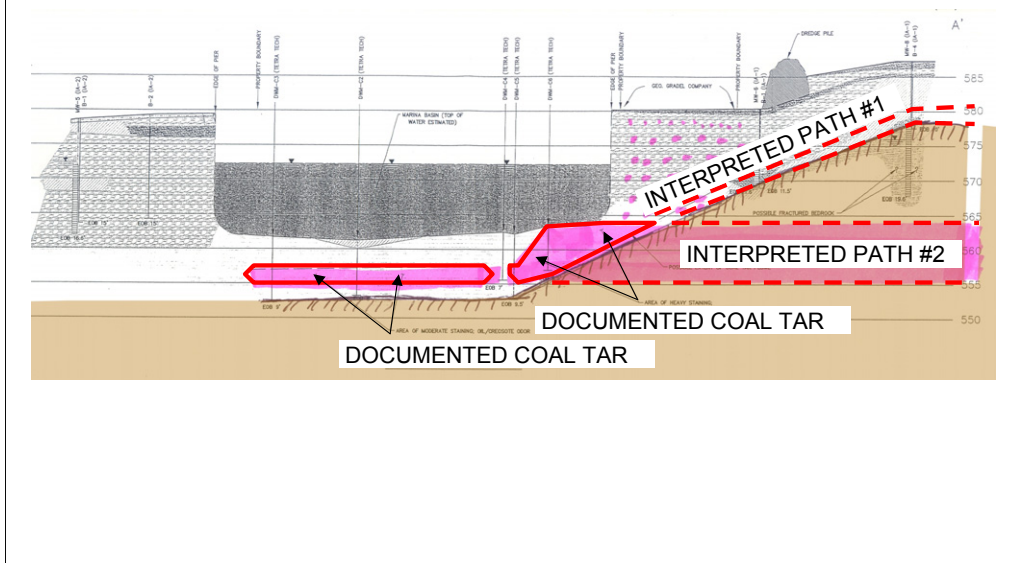


Under the coarser fill is a bit of a clay layer in the pier. This clay layer also abuts the limestone [correction: silty clay].



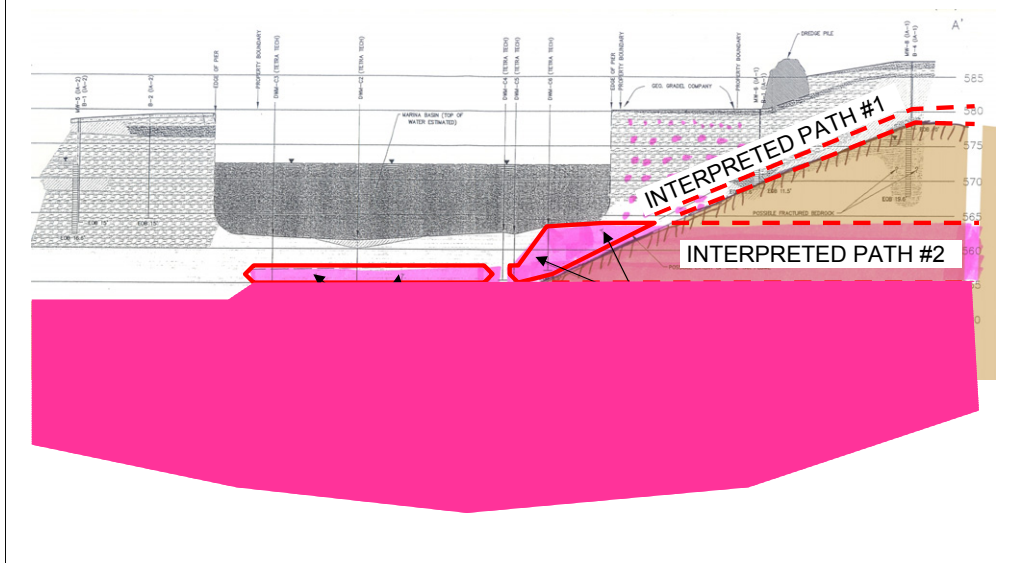
Not based on drilling logs, but projecting the limestone, it would be under all of this. Partners found a little bit of the limestone in one hole [at the end of the pier for which stratigraphy is shown]. [corrected]

# DEEPWATER COAL TAR PLUME CROSS-SECTION

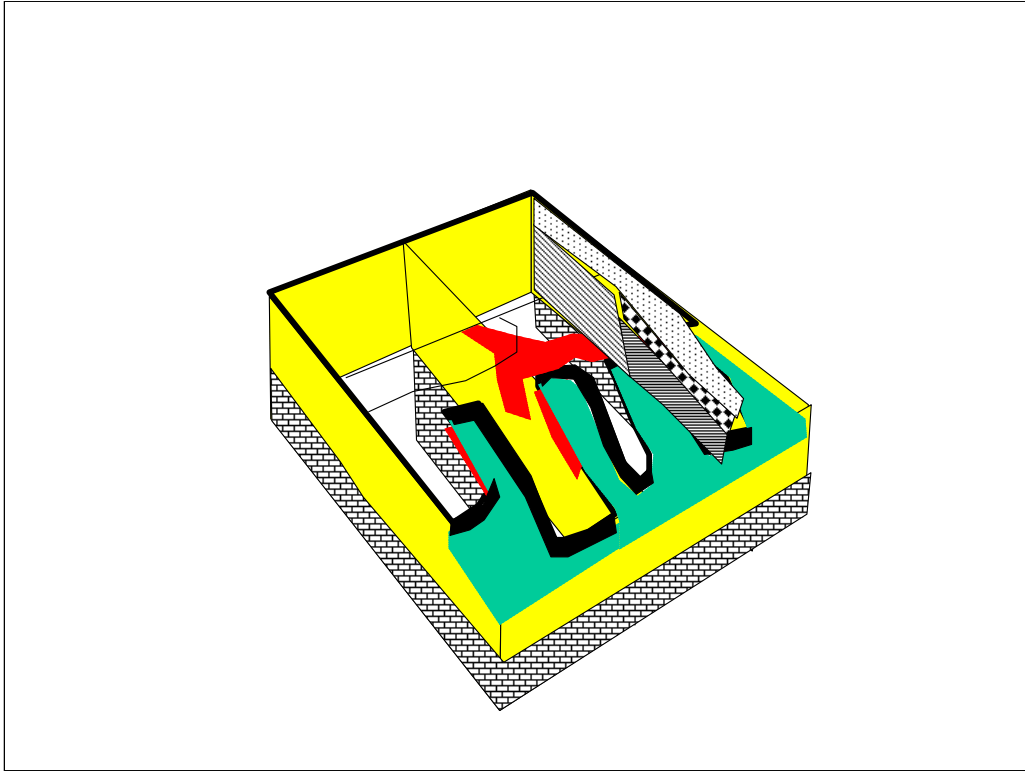


Back to things you have seen before. Here at the surface, we see Water Street and Shoreline Drive. Here we see the sloping bedrock surface that used to be the shore, with fill materials placed on top of it.

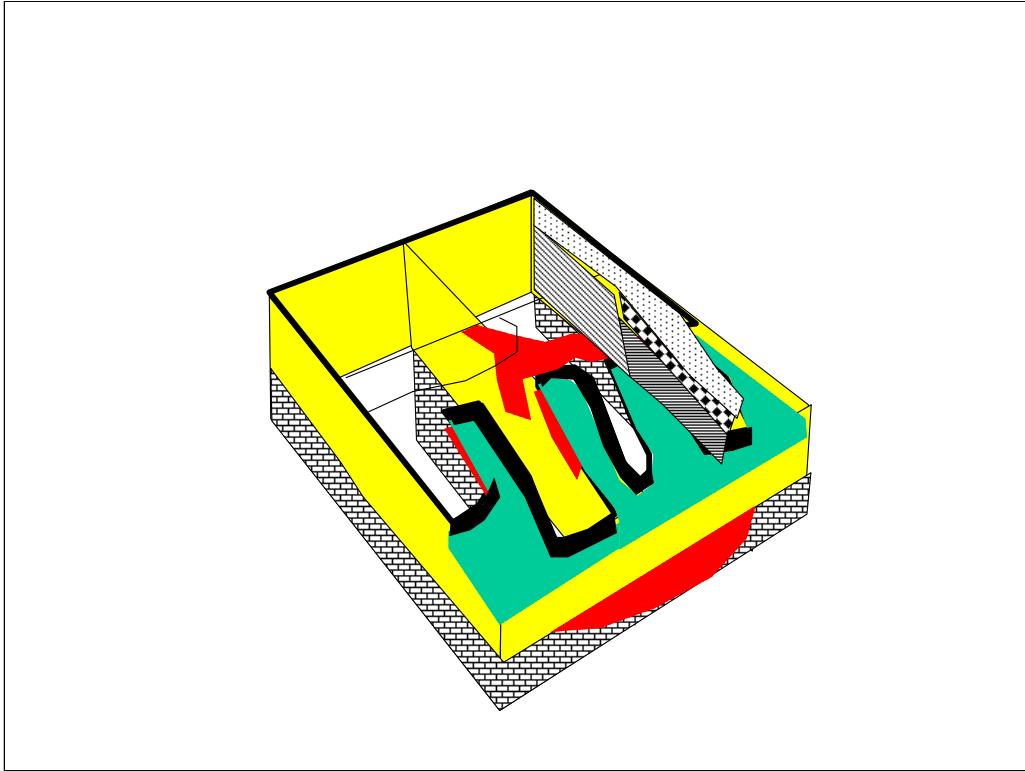
# DEEPWATER COAL TAR PLUME CROSS-SECTION



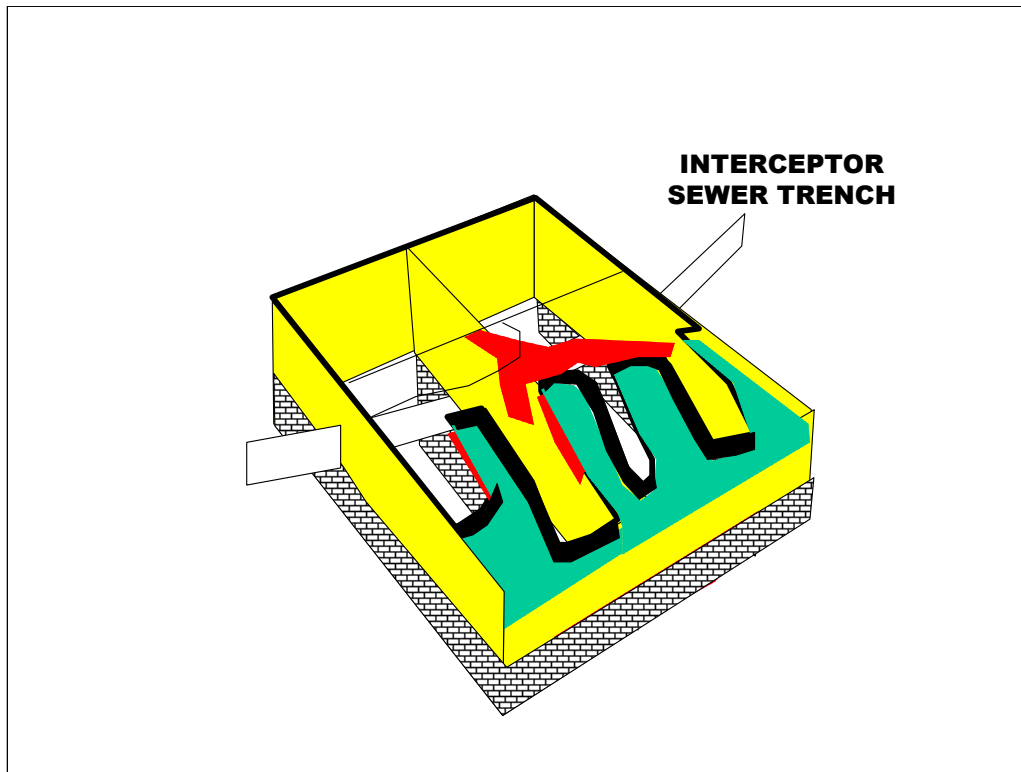
Once we think about the coal tar in interpreted path #2, there is no reason not to think it might not go deeper, as suggested here.



Here is how the plume is conceived if it does not go deeper into the limestone. The next slide illustrates what the plume might look like if it were to be deeper in the limestone. [corrected]



Here is how the plume might look if it were to be deeper in the limestone. We either need to think about it, or decide why it doesn't matter. [corrected]



We also need to think about the potential effect of the interceptor sewer, and whether it served as a pathway to carry the coal tar into the fractured bedrock.  
[corrected]



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**Remedial Design Elements**

Under-run via bedrock

Is there a bottom confining clay layer?

Under-run via interceptor sewer

End-run

Things to think about: Can the coal tar get to the fractured bedrock? There has been mention of a continuous clay layer that would prevent the coal tar from migrating into the bedrock. Is this clay layer present? Even if there is a clay layer, has it been cut through by the interceptor sewer installation? These are not problems; they are design issues for consideration.

**SANDUSKY  
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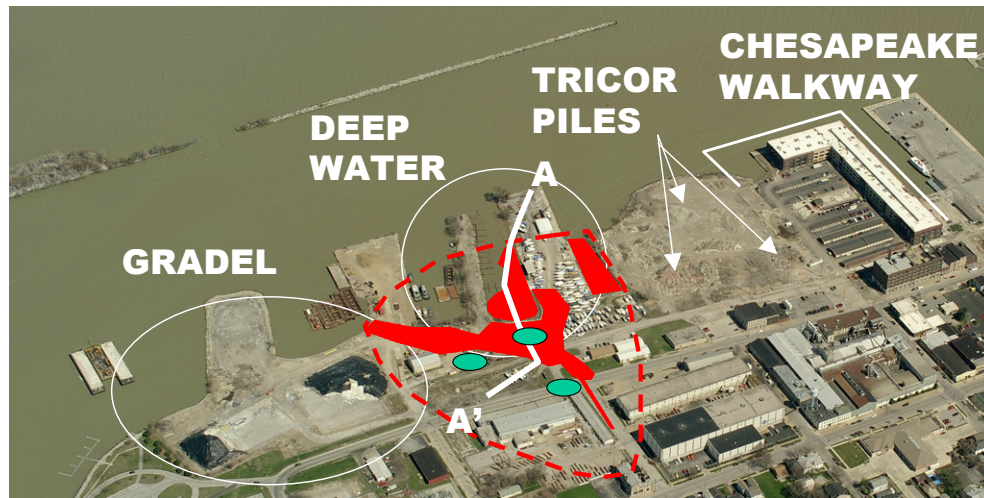
Meeting on 14-Apr-09

**Focus of this study**

Under-run via bedrock

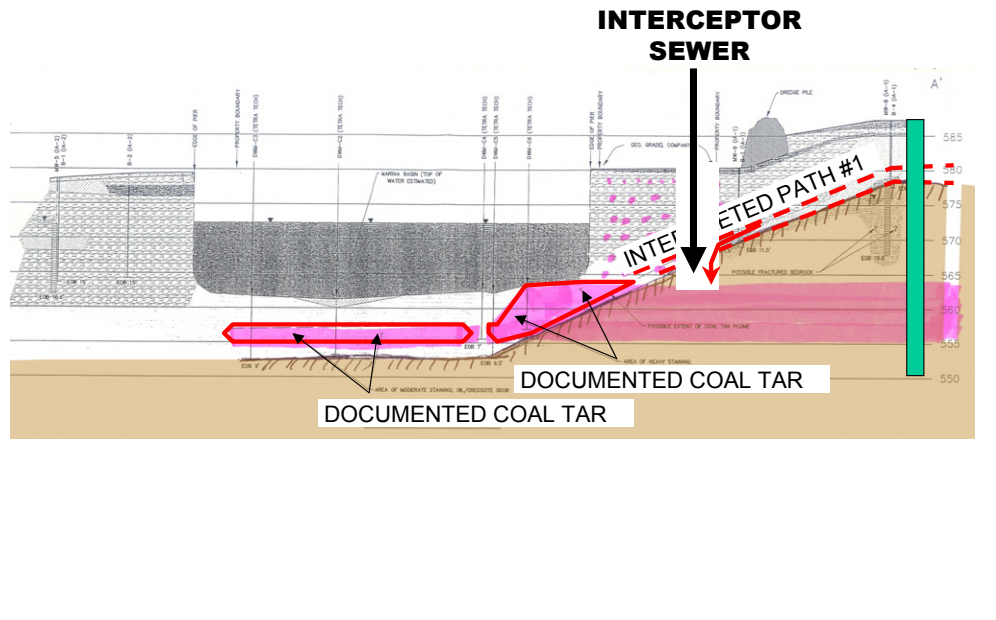
The 3-hole investigation that we are preparing to do is intended to determine if the coal tar plume is likely to under-run under the proposed retaining wall by way of the fractured bedrock.

## COAL TAR IN SANDUSKY'S PAPER DISTRICT



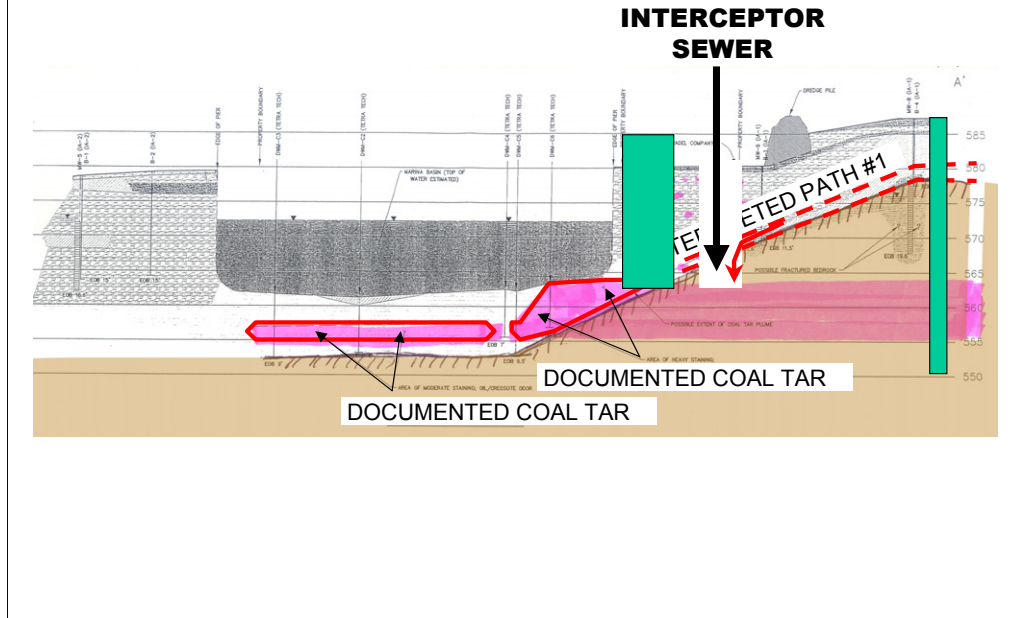
Here is a suggestion for of three hole locations for everyone to shoot at. We estimated that this investigation will cost \$25,000, payable by the USEPA grant. That estimate does not include the cost to produce a sampling and analysis plan.

# DEEPWATER COAL TAR PLUME CROSS-SECTION



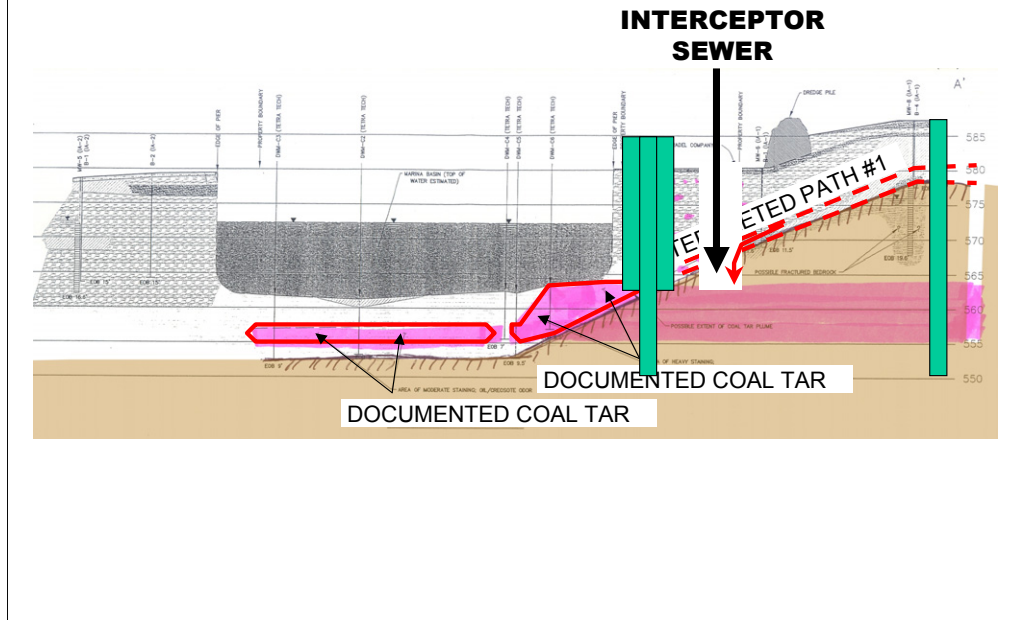
One hole, shown above, is suggested to address the pink-highlighted area, to look at interpreted pathway #2. The hole would be drilled in a place where there is no coal tar plume to cut through.

## DEEPWATER COAL TAR PLUME CROSS-SECTION



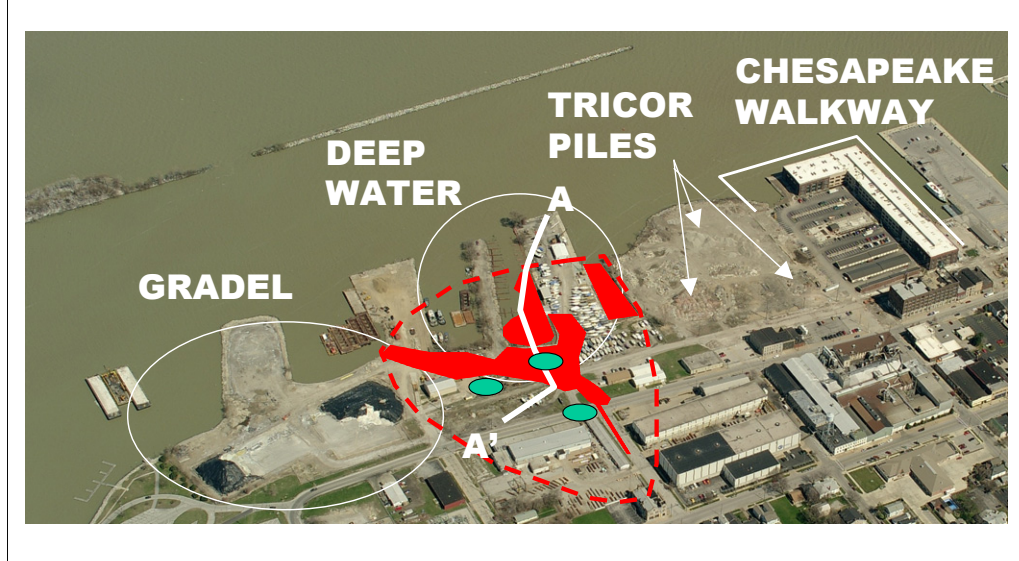
If we want to put in a hole in an area where we have found coal tar, the hole will be drilled with a double casing. We would first drill into the clay, grout the casing, then clean out inside of the casing. This would create a large clean hole that has no coal tar in it.

## DEEPWATER COAL TAR PLUME CROSS-SECTION



Then a second hole would be drilled through the first one. This process is more expensive, but it is what has to be done when drilling through a plume area.

## COAL TAR IN SANDUSKY'S PAPER DISTRICT



Bob Haag: Now let's discuss the end point, so that we can send Dan Brown off so that he can plan the investigation.

Joe Hayberger: I wish Bob Warner was here to explain his idea. Is all of the investigation to determine if it is safe? Bob Warner mentioned that Ohio EPA signed off on the original plan.

Bob Haag: Karla Auker (USEPA) signed off on the plan, and so did Dan Brown.

Joe Hayberger: Then why are we doing this?

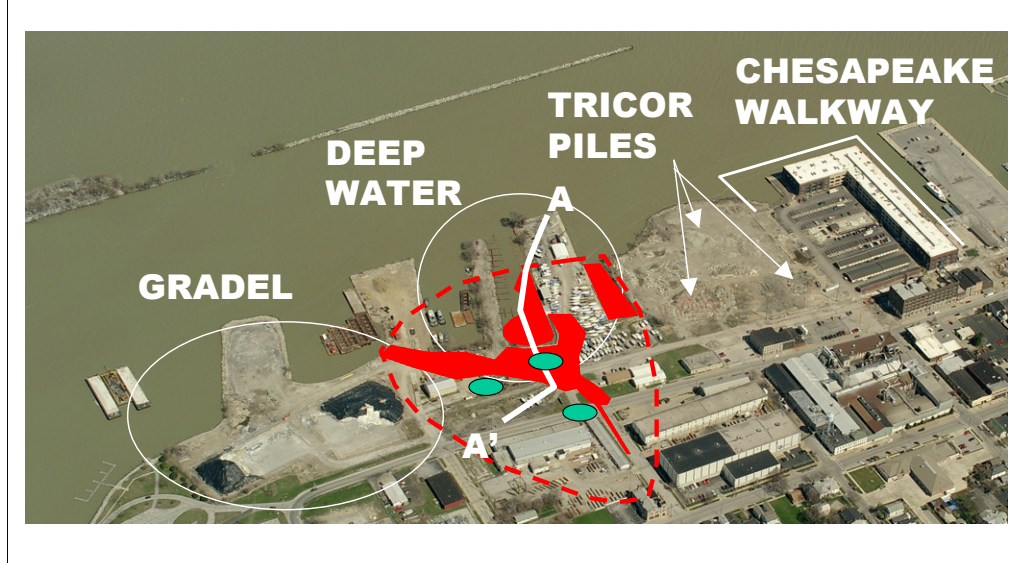
Bob Haag: The remedial plan was to put a cutoff wall on Gradel property. We (HaagEnviro) said that all of the design issues had not been addressed. Gary Packan said there would be additional design carried out on the remedial plan.

Joe Hayberger: Do we have a copy of what OEPA came up with? [Editor's note: The consultants come up with the plan, not the OEPA. Agencies review consultants' proposed plans.]

Bob Haag: What came up was assumptions of a design that would keep contaminants from reaching people. If conditions should change, as they often do, we want to make sure that people will still be protected. The first step is to revisit the design issues. Back when we first raised those questions the response was "Don't talk about it." We went to an executive session and presented our concerns to Commission. We got some support. Now, we are at the point where we can bring these and other issues to this group. We are just trying to see if the remedial plan will work. Somehow, this has been translated into "driving industry out of town." Ruth Haag is the person who put "keeping industry in town" on the original Brownfield Committee priority list.

Lance Warner: Can we go back to the cross section slide? If we find that the coal tar has gone down and can migrate out into the slip or bay, is the appropriate action to leave it because as long as it is under sediment, it won't do anyone any harm?

## COAL TAR IN SANDUSKY'S PAPER DISTRICT



Bob Haag: Years ago, when USEPA evaluated remedial alternatives, they said that ultimate destruction of contaminants was the best idea. This turned out to be so expensive that alternatives that were more rational had to be determined. At that time, the clean up criterion was 1 additional cancer per 1,000,000 people. That number was pulled out of air, so it had no real justification. Later, it was determined that people could be exposed to more contamination. We began to look at the paths by which contaminants reach people, and remediated by cutting off the pathways. This is embodied in the Ohio VAP, which is to keep people from coming into contact with contaminants.

Lance Warner: The water in the slip is way too deep to wade in, so if it is under the sediment it is cut off from people. In Ashtabula, a determination was made that more damage would be caused by trying to remove it. It would be different if we find it is migrating.

Bob Haag: Many projects came to that conclusion. I did preliminary calculations for PRPs (potentially responsible parties) in the Fields Brook Superfund site. This project was one of Karla's first projects. The problem was a source control issue.

Karka Auker: If Water street used to be the shore line, when was that filled, and how does that relate to the time frame of the tar well?

John Lippus: Shoreline Drive existed in the early 1800s, therefore before the Manufactured Gas Plant.

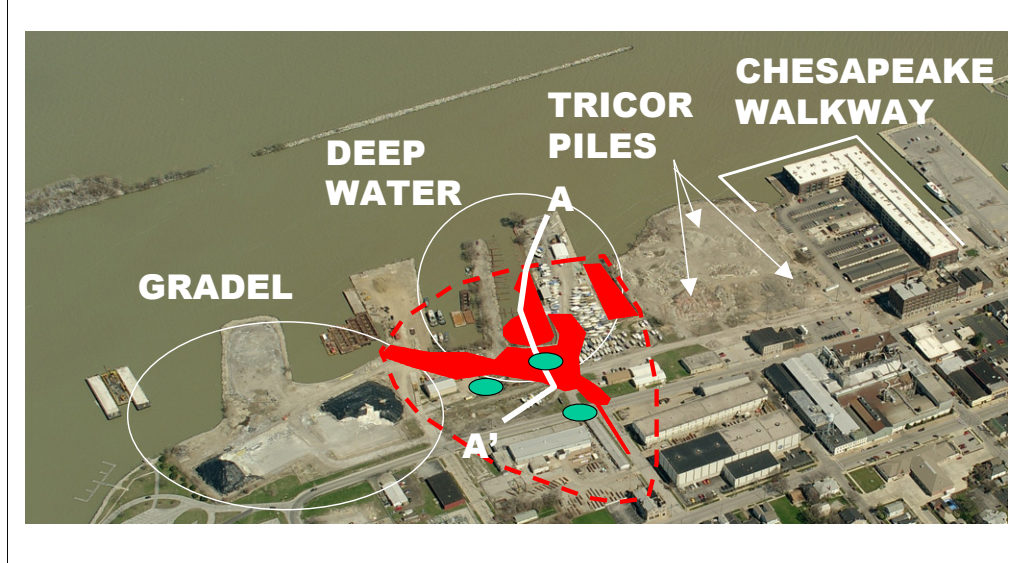
Karla Auker: When was the tar well put in?

Bob Haag: Dan Brown did an analysis of the history of the businesses on that site.

Karla Auker: If we have a tar well, maybe to hold or to dispose of waste. Also, it might be that the general practice was to pump it into the river. There are two things to think about: is there a clay layer under the tar well? Or, if it was pumped, both need to be evaluated. Do we know where the tar pit is? If so, could we put a couple of soil borings to decide how deep it is? Put one boring close to the source. Can we get access?

Bob Haag: We would need to talk to Mark Harrington, it is on property owned by Sandusky International. I like that exploration proposal, and would add taking the boring into bedrock.

## COAL TAR IN SANDUSKY'S PAPER DISTRICT



Karla Auker: There would be one well instead of three. Bob is pretty well set that the tar well is the source. I have no issue with Bob's question, truly no issue. It is not a big deal, if we find the coal tar deeper, then we will make the interceptor wall deeper.

Bob Haag: That will cost more.

Dan Kaman: If we decide to put a steel wall in, and the plume keeps moving, and we build condos, everyone will be happy, initially. Then 20 years down the road, a problem will come up and everyone will question me about why we didn't handle it in the first place. I want to make sure it is done right. This has been accepted by this committee, who want to do it right.

Joe Hayberger: I have to ask questions, about OhioEPA signing off. Bob explained it, so I am happy.

Lance Warner: The question still becomes, "When does that become actionable if it is below water?"

Karla Auker: The issue is, "Do we have enough information to come up with a remedy that is sound?" What I'm hearing is a question of "Is the coal tar in bedrock?" If we find it is, then we can put the interceptor in deeper. I am more concerned by the width of the coal tar plume. I think it is more likely to go around the wall, rather than under it.

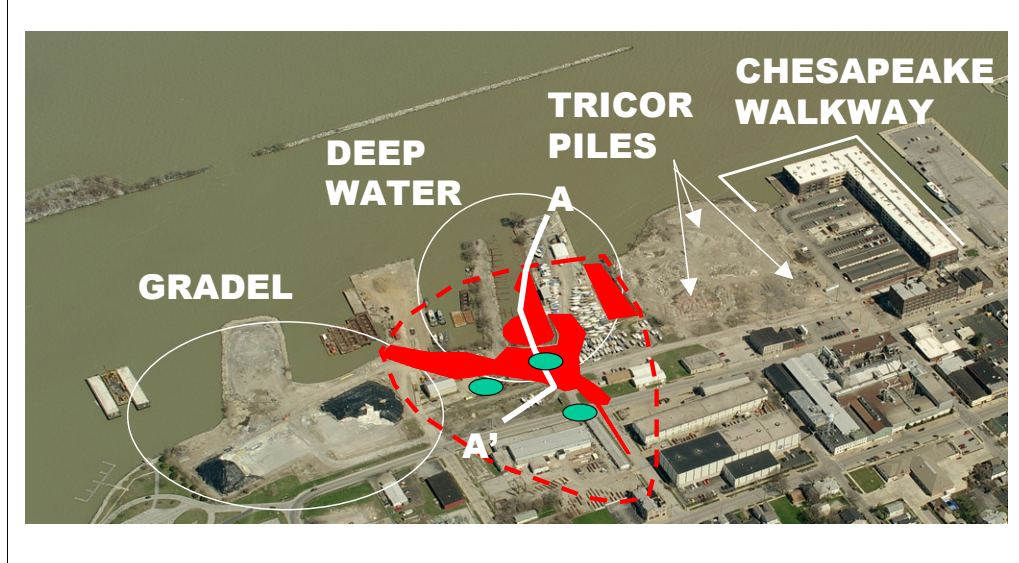
Jeff Krabill: Do we know that the oily substance in the slip is coal tar?

Bob Haag: We can analyze stuff from a boat bottom as a part of this study.

Karla Auker: Malcolm Pirnie did an analysis.

Bob Haag: Yes, OEPA found an overlying sediment layer in an initial study that led to the conclusion that no action should be taken. At that time the Coast Guard said it was hazardous, therefore USEPA's realm. USEPA said it was not in contact with water, therefore there was not an imminent and substantial threat. USEPA did not determine that it is absolutely no threat, it was just not imminent and substantial.

## COAL TAR IN SANDUSKY'S PAPER DISTRICT



Karla Auker: The long term threat is to disturb the sediment and have swimmers and boaters exposed.

Jeff Krabill: Back to days in Chemistry and Biology, the question is, is it miscible in water?

Bob Haag: The solubility is low.

Jeff Krabill: Petroleum derivatives are light, is this lighter?

Bob Haag: You missed that part of the talk, because you came late. Some are lighter and some are heavier.

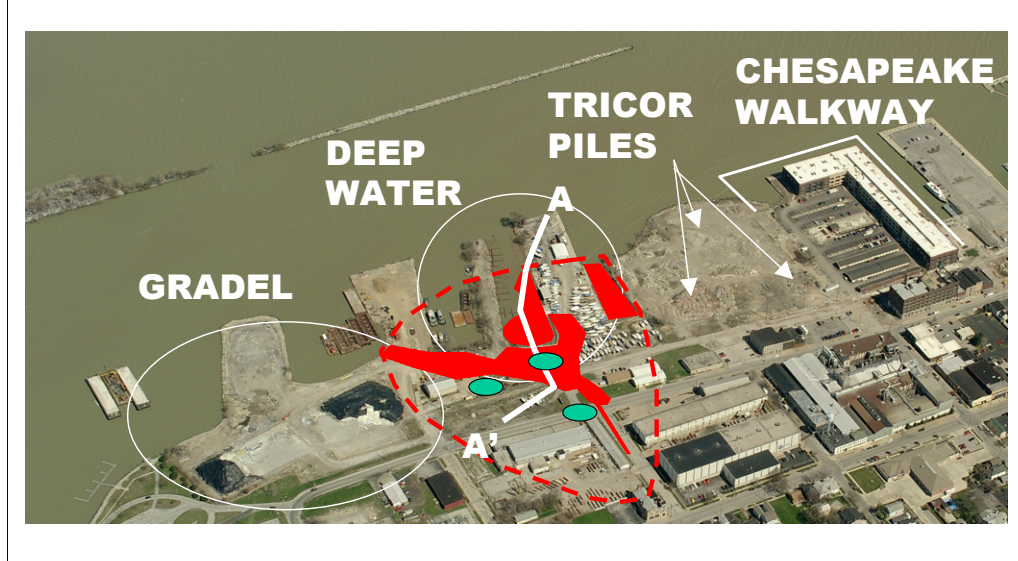
Tim Schwanger: I dock in that slip. It is not an oily sheen, it bubbles up like algae. I don't do cannon balls off of my boat, I do that in the bay. The issue we are discussing is that we don't feel the original tests went deep enough.

Bob Haag: I don't feel we have adequate information regarding the plume to make a reliable remediation design.

Tim Schwanger: We can put in a coffer dam.

Dan Brown: It is important to recognize that the remedy was not designed in a vacuum. It was in concert with a development plan for a residential development. What was the best thing we could do to make this better? We crafted a plan to interface with the development. It was not to address a coal tar plume, it was with a economic development plan and a grant. If you come and say 'We want to clean up the plume and we have \$40 million' I would tell you something different. Also as a part of the assessment, it was not an exclusive design. It was a preliminary plan for when the award was made. After that, there would have been a formal engineered design. The conceptual plans were based on exhaustive studies. For Ohio VAP and Ohio EPA and experts. There was quite a bit of scrutiny. We made sure that complete understanding of the contamination was done. The VAP requires detailed assessment. If there was belief on part of any people that there was a deep potential release, we would have looked at it. Not that no one thought it was possible. Based on evidence and investigation it didn't warrant further investigation. This doesn't mean it is not possible. It is based on all sorts of things. I can't remember them all. Also, coal tar is a highly viscous material, very resistant to flow. Is hard to pull out of a well. You could set a pencil in it and it would not move. Anything it touches is ruined, will not come off. It has low mobility, it is in the ground. The average temperature in the ground is 55 degrees, so it is cold. It is not in an open box, it is in rock and sediment, little spaces. It can't move easily. It is not very mobile, it can't work its way through the ground. It was released in late 1800, by the early turn of the century; MGP didn't exist after 1910 or 1920. [Editors' Note: Manufactured gas plants generally were in operation until the 1940s and 1950s.]

## COAL TAR IN SANDUSKY'S PAPER DISTRICT



Bob Haag: It is 4PM, so we should stop now and allow anyone who wants to leave, to be able to leave. [No one left.]

Jeff Krabill: I know what coal tar is. It is not flowing, it is viscous. Dan Brown, in your mind was this dumped in the lake or did it flow out?

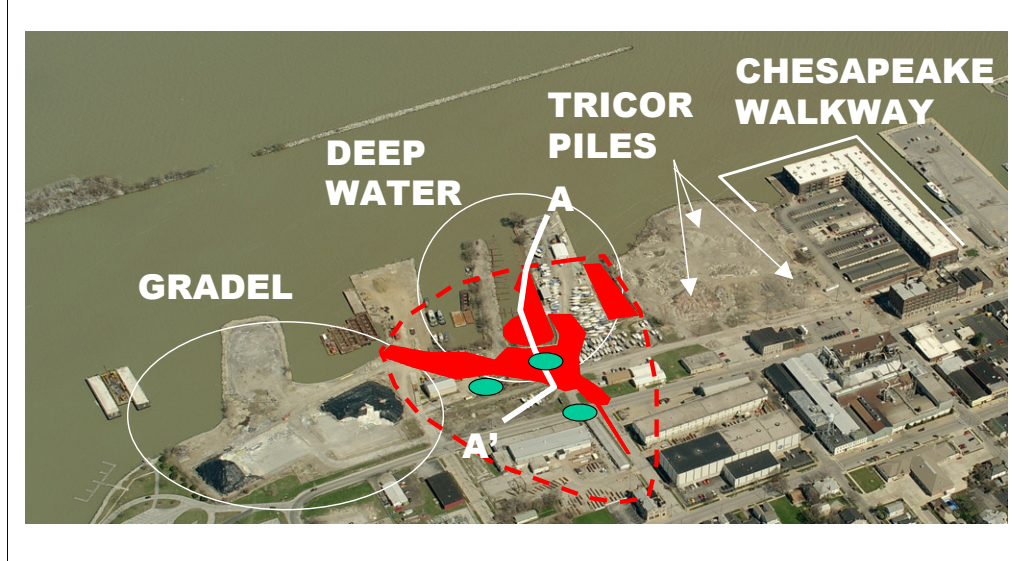
Dan Brown: I think sediment in Deepwater has coal tar, and is possible that under the right circumstances it can bubble up. USEPA looked at it and so did the Ohio EPA. I think a storm event can stir up sediment, and sediment closest to the surface has some coal tar in it. But based on my evaluation of data, I have a different opinion. I believe the coal tar was pumped and discharged in a network of pipes and sewers, probably into Deepwater slip in the late 1800s. Because of leaks in pipes, it probably didn't stay in pipes and that is why you see it spread. Down the same right of way is a Combined Sewer Overflow (CSO). This discharges at the bottom of the water and top of sediment, into the slip. Someone else's oil leak could come down the CSO and make a sheen in the slip. Also it is Partners' suspicion that the trench of the CSO may be serving as conduit to the Deepwater slip. One of components the of remedy is to seal off the CSO conduit. I think there is a combination: coal tar deposited many years ago covered by sediment, coal tar on the CSO pathway, and other sources of contaminants that come down the CSO into the slip.

Bob England: What is Bob Haag's proposed recommendation to deal with this issue? No plan can guarantee it will eliminate the issue. From my concern with the Health Department, the likelihood of exposure is small, people don't swim in the area. There is a likelihood of long term disease. If we are going to move forward, we have a proposal on the books for a solution, we should go on with it. It is more likely to have skin cancer from UV light, heart disease or from a poor diet. The likelihood of death is unbelievably remote.

Karla Auker: There are two issues: Containing coal tar on the surface of the land so that property can be redeveloped, and not adding more coal tar to the slip. The second issue is the slip. We shouldn't look to clean up coal tar in the slip until we have solved the issue on the land.

Jeff Krabill: I used coal tar for eczema and a coal tar shampoo for dandruff. I don't want to ignore what long prolonged exposure can do. I am really asking where do we put the well, how deep?

## COAL TAR IN SANDUSKY'S PAPER DISTRICT



Dan Brown: The proposal was for a set of alternatives. If the site is not in the long term a marina site, we can just put on an appropriate clay cap and put in a retaining wall.

Bob Haag: The present funding mechanism is 2 CORF grants. The first one, which applies to Gradel, included a cut-off wall and a specific development project. That project is not going forward, so the plan is on the shelf. The second grant is for Deepwater, and the development partner for Deepwater is gone. Generally ODOD doesn't want two separate grants for one problem. The whole reason for this coal tar plume problem is the parcel-by-parcel approach. This is just about how to remediate the plume with the development plan and what is in the slip.

Karla Auker: The whole point is the reason Bob Haag wants borings to develop a remedial plan.

Tony Guerra: How many holes, and will we just keep drilling?

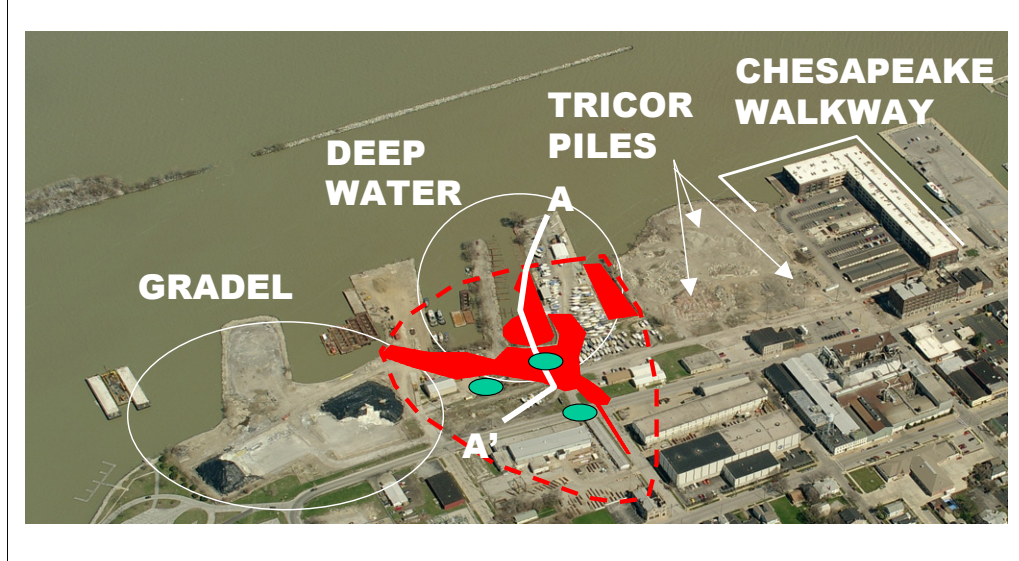
Bob Haag: We don't have enough data for both projects. We might find it while building the condos, and that can be an acceptable approach. I suggested a long time ago to Gary Packan and Mike Will that we could build structures with parking on the ground floor, and residential above. It would not be good to use a design with a basement. I am looking for the committee to say "that's safe enough," it should not be what Bob Haag said, or what the government said.

Lance Warner: This approach is trying to get our arms around it. How shallow is shallow enough that we need to deal with it? How deep is deep enough to let it stay?

Bob Haag: Two feet is considered enough protection on the Walkway, but this solution has to be maintained. The project has an Operation and Maintenance Plan that has to be adhered to.

Ruth Haag: We need to refocus on the goals that we set last fall: make it safe, no surprises, make the land ready for future generations. The plan to put in the investigation wells has been voted on by Commission so it is going to happen, now the only question is 'Where do we put the wells?' It is not, if we are going to put in the wells.

## COAL TAR IN SANDUSKY'S PAPER DISTRICT



Lance Warner: How deep will the holes be, this is part of the discussion on making the new marina.

Matt Kline: If it is 30' into bedrock, does that make it more expensive?

Bob Haag: Yes.

Karla Auker: If everyone knows where the tar well is, go drill near to it. If there is no contamination near to the tar well, then just do one well. Then we can be comfortable with the assumptions that were made. This does not change anything as far as USEPA is concerned, it will be a Brownfield project, and will never go CERCLA. If a project is moving forward in a Brownfield arena, USEPA does not take it to a CERCLA approach. If it is not moving forward, or a PRP (potentially responsible party) is not cooperative, then it changes. (Dan Kaman asked Karla to repeat this statement, and she did.)

Karla Auker: Maybe it is not a well, maybe it is a cavern. If we can find the source and cut it off, that will take care of it. My gut feeling is that nothing is left of the source.

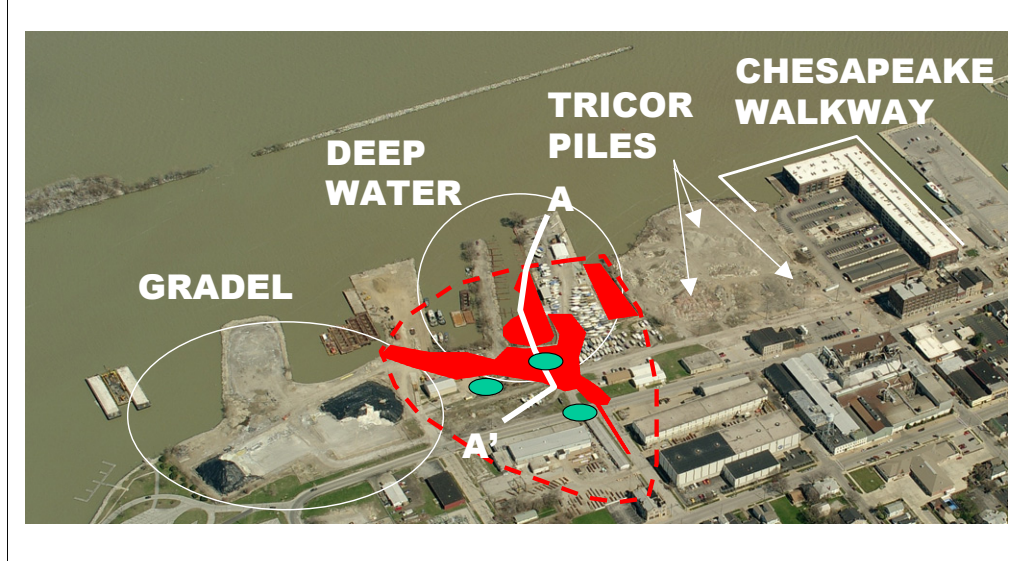
Matt Kline: If it is in the bedrock, how does that change the current remediation plan?

Bob Haag: The current plan is sheet piling to bedrock. As Karla pointed out, if that is the scenario, then we will just have to make the plan better.

Dan Brown: We had to develop a plan for Gradel because Deepwater was not on the table. What happened is when Deep Water came along the City sat down, and said it is one plan and not two separate plans. But we had to keep them separate, or the sites would not be eligible for the funding. We had to show how Deep Water would be OK. We planned to come back to ODOD with a new plan, a plan that involved lots of filling on Gradel and Deepwater that would move the shoreline out to end of the slips. The cutoff wall was a sheet piling wall for construction and would be at the edge of the bay. Under that scenario even if coal tar is in the bedrock 30' down it would not be coming up in Deepwater. The actual plan doesn't matter anymore.

Bob Haag: I think it does matter, this is sounding better: a 15' cap and Karla says no CERCLA issue as long as the project is moving forward. The City has not given up thoughts of moving the whole project forward.

## COAL TAR IN SANDUSKY'S PAPER DISTRICT



Matt Kline: What is the likelihood of the Army Corps saying yes to filling slips?

Dan Brown: I think it is likely.

Matt Kline: This is the first I have heard this.

John Lippus: It was just preliminary discussions.

Dan Brown: It would have been significant steps to fill in.

Matt Kline: What kind of fill?

Dan Brown: There are lots of options, there were evaluations in the development plan; volumes were determined.

Bob Haag: That sounds pretty intriguing.

Dan Brown: That was the plan laid out in front of ODOD.

Matt Kline: Is there any chance at Tricor, where a new marina is proposed, that some of that material could be used to go into the lake?

Dan Brown: With the condition at the Tricor site, you can't put that material in the bay.

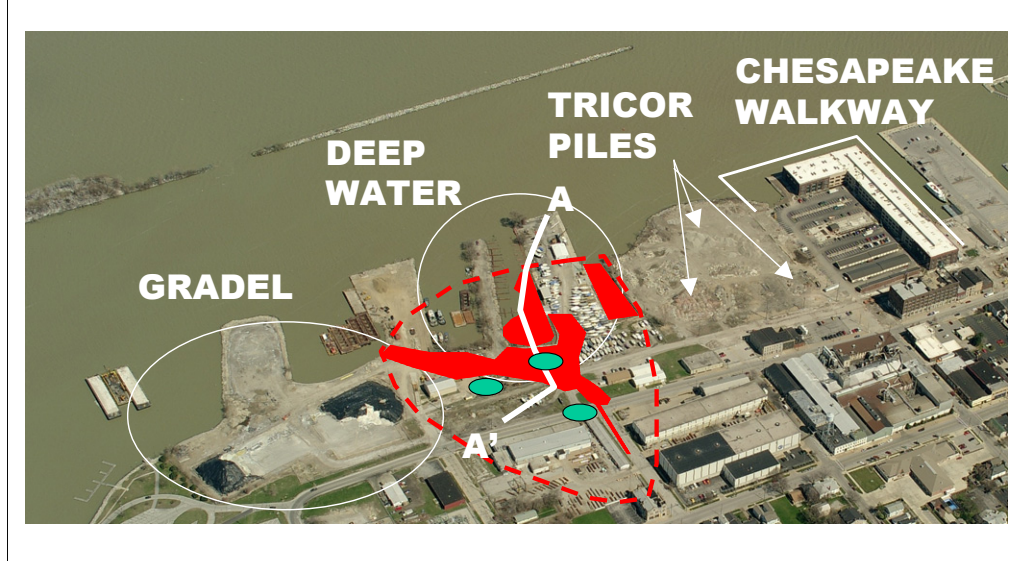
Lance Warner: Let's determine a depth that everyone is comfortable with.

Bob Haag: The stuff is 15' down. Back at the buildings, it is generally 15' down. We are not talking about digging into it.

Lance Warner: If a likely development is not going to go down deeper than 15', it is already down below depth.

Karla Auker: Things are getting confused on this issue. How deep the coal tar is does not have anything to do with development. What Bob is concerned about is migration. He is worried that the coal tar that is 15' underground is going to discharge into the slip.

## COAL TAR IN SANDUSKY'S PAPER DISTRICT



Lance Warner: Even if it is 15' down, the sediment caps, so what is the problem?

Karla Auker: I don't think it is in the bedrock. But the issue has been raised, let's put in a couple of wells and put it to bed. We have the money.

Lance Warner: What if we find it in bedrock?

Karla Auker: Then we will make the containment wall deeper, so the coal tar won't get into the lake. It is highly unlikely it will get into the lake this way. It will be more likely to go around the containment wall than down under it. Going around the sheet piling is a real problem.

Dan Brown: The idea behind sheet piles is that they were to be sealed to limit the potential of the coal tar to go through; it would still have to migrate 100'.

Tim Schwanger: We have talked about extraction, is it ruled out? We are just talking about putting up walls. I don't think that US Fish and Wildlife will have issue with filling in the slip.

John Lippus: The main slip proposed to be filled is Deepwater. A question for Bob, if it is not at water's edge, it wouldn't be a problem. The issue is the potential to get into water and into sediment and move on. Which is why the proposal to fill the slip is good. Cut off the end of Deepwater, drain the water, clean up the coal tar then fill the slip in.

Jason Singer: Isn't it possible that a wall will push coal tar around it?

Bob Haag: That was the concern when we were remediating half of a plume. Undoubtedly we will need some sort of monitoring to decide if lateral migration will occur.

Dan Brown: That plan is not on the table anymore. Because there was not a source on Gradel property, we didn't have an obligation to clean it up. Our obligation was to not make it worse or affect anyone on the property [Gradel]. It was a legitimate and acceptable answer. The plan was not designed to make sure that the coal tar was not going into Deepwater because then, Gradel was the only concern. It was a faulty design but completely acceptable to VAP.

Bob Haag: Something completely legal might still not be what we want to do. I want the group to decide.

Dan Brown: The reason it transpired was because of the impasse with Deepwater, and the City made a choice to get something done.

**SANDUSKY  
BROWNFIELDS COMMITTEE**

Meeting on 14-Apr-09

**Thanks for Participating!**