



Verification Report for

Penn-Ohio Coal Company
Kimble Sanitary Landfill Gas Project
Dover, Ohio, USA

Climate Action Reserve
Project ID CAR 621

Landfill Project Protocol, Version 3.0

16 August 2011

Report Prepared for:

Penn-Ohio Coal Company,
DBA Kimble Sanitary Landfill
3596 State Route 39 NW
Dover, Ohio 44622 USA

Report Prepared by:

NSF International Strategic
Registrations, Ltd.
789 Dixboro Road
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Summary

Penn-Ohio Coal Company D.B.A Kimble Sanitary Landfill engaged NSF International Strategic Registrations, Ltd. (NSF-ISR) to verify its destruction of methane gas from a destruction project reported to the Climate Action Reserve for the reporting period 1 January 2010 through 31 March 2011.

Penn-Ohio Coal Company D.B.A Kimble Sanitary Landfill is a project developer as described by NAICS code 56221. The project consists of the collection and flaring of landfill gas (LFG) from the Kimble Sanitary Landfill located at 3596 State Route 39 NW, Tuscarawas County, Dover, Ohio 44622, USA.

1. Introduction

1.1 Objective

The objective of this verification audit was to determine, with reasonable assurance, that Penn-Ohio Coal Company D.B.A Kimble Sanitary Landfill had met all eligibility rules and had quantified, monitored and fairly reported to the Climate Action Reserve emission reductions of methane from the destruction of landfill gas in a flare.

1.2 Scope

The scope of the engagement included verification of the quantification, monitoring and reporting of greenhouse gas emission reductions from the project at the Kimble Sanitary Landfill for the reporting period of 1 January 2010 through 31 March 2011. The scope included verification of the calculated project emissions associated with combustion of fossil fuel in a single flare and indirect emissions attributed to electricity consumption from project-related activities. And finally, the scope of this verification covered a review of all eligibility rules for this project per the requirements in the Landfill Project Protocol.

1.3 Criteria

Penn-Ohio Coal Company D.B.A Kimble Sanitary Landfill implemented its methane reduction in accordance with the requirements of the Landfill Project Protocol, Version 3.0, December 2, 2009 and Errata and Clarifications to Landfill Project Protocol, Version 3.0, July 11, 2011. NSF-ISR conducted its verification of the reported emission reductions in accordance with the requirements in Section 8 of the Climate Action Reserve's Landfill Project Protocol, Version 3.0, December 2, 2009, the Verification Program Manual, December 20, 2010, the Program Manual, March 16, 2010 and ISO 14064:2006, Part 3, Greenhouse gases – Specification with guidance for the validation and verification of greenhouse gas assertions.

1.4 Materiality

In accordance with the guidelines in the Verification Program Manual, emission reduction assertions were considered fairly stated if they varied by no more than 3% for both vintage years 2010 and 2011. These percentages are based on annual emissions for 2010 and pro-rated emissions estimated for the whole year of 2011 based on the sub-annual registered emissions for 2011 reported for this project per the criteria in the Climate Action Reserve's Verification Program Manual. Thresholds of materiality allowed verifiers

of emission reduction reports to consider as immaterial discrepancies less than the stated percentage for each year mentioned above. In addition, deviations from the protocol are considered material.

1.5 Level of Assurance

This engagement was performed at the reasonable level of assurance.

2. Verification Approach

2.1 Team appointment and COI Review

This verification was performed by Mark Lutz, NSF-ISR Lead Verifier and reviewed by John Shideler, NSF-ISR Senior Internal Reviewer. Conflict of Interest inquiries were completed for NSF-ISR, the Lead Verifier and the Senior Internal Reviewer. A finding of low COI risk was confirmed by the Climate Action Reserve on 2 May 2011.

2.2 Document Review

The Lead Verifier conducted a document review to inform the planning process in advance of performing on-site verification activities. Documents reviewed included Kimble Sanitary Landfill's project documentation submitted to the Climate Action Reserve, project reports, flow metering and data logging instrumentation documentation, calibration documentation, data logging records, monitoring plan, compliance attestations and supporting documents and site equipment and drawings.

2.3 Planning

NSF-ISR's verification approach is risk-based. It draws upon our understanding of risks to fair statement of reported emissions and the operation of controls to reduce such risks. As a result of the document review and preliminary conversations with Element Markets personnel (Element Markets, LLC is the company contracted by Penn-Ohio Coal Company D.B.A Kimble Sanitary Landfill to assist them in this project), a verification plan and a sampling plan were developed for this engagement.

2.4 Verification Activities

As a result of its planning process, NSF-ISR conducted a site visit at Kimble Sanitary Landfill in Dover, Ohio. The site visit was conducted from June 14 through June 15, 2011.

Verification activities included:

- Confirmation of the project start date, eligibility, ownership of the project, and quantification of project emission reductions;
- Review of the project eligibility details under NSPS Emission Guidelines for MSW Landfills;
- Confirmation of the continued control environment, information management systems and monitoring plans at offices and facilities operated by Kimble Sanitary Landfill;
- Review, on a sampling basis, of compliance with relevant environmental regulatory requirements at the Kimble Sanitary Landfill site;

- Selecting locations and processes within the scope of the Kimble Sanitary landfill’s gas project to visit based on an assessment of risks to fair reporting;
- Reviewing the basis for and results achieved from the calculated methane emission reductions from its landfill gas collection and destruction project;
- Verification that Kimble Sanitary Landfill’s monitoring program and data management system addressed and recorded Protocol monitoring parameters during each project period; and
- Verification that Kimble Sanitary Landfill’s records of its management system contains procedures for acquisition and retention of all Protocol-required information, and that such procedures have been implemented.

3. Verification Findings

3.1 Project Description

The project consisted of methane collected from a landfill that included 44 LFG vertical extraction wells, associated piping and a blower/flare skid. The LFG was combusted in one open flare. The landfill consists of 214 acres of waste disposal. The landfill has been developed in three phases consisting of different disposal areas that include several closed cells, active phases and unconstructed phases.

3.2 Eligibility and Title

Project Location: The project was located in Dover, Ohio – located entirely within the U.S. and was eligible as a landfill project under the Climate Action Reserve Protocol.

Project Start Date: Penn-Ohio Coal Company D.B.A Kimble Sanitary Landfill provided documents to support the evidence of the construction of the landfill project including documentation of flow meter readings and temperature data at the flare skid before and after the project began; a letter to Kimble Sanitary Landfill from Shaw Environmental and Infrastructure, Inc. (February 12, 2010) that provided a report of start-up activities, training, well field and operational check data at the time period of the startup and various other notes regarding startup details. These documents confirmed that the project start date was 28 December 2009, and that the project met the start date eligibility requirements.

Crediting Period: The crediting period was from 28 December 2009 (the project start date) to 27 December 2019. The reporting period, (1 January 2010 through 31 March 2011) is within this crediting period.

3.3 Additionality

Legal Requirement Test: NSF-ISR confirmed that Kimble Sanitary Landfill was not required to manage its landfill gas under both the Ohio EPA and local regulations. A review was done of several permits issued by the Ohio EPA, including a “Municipal Solid Waste Landfill Permit” (9 June 2010), “Conditions of Licensure.” There was no evidence on this permit, nor on any of the other permits examined, that Kimble Sanitary Landfill was required to capture and destroy landfill gas.

The New Source Performance Standard (NSPS) for MSW landfills requires that landfills that began receiving waste after May 30, 1991, with a design capacity greater than 2.5 million megagrams to control emissions of non-methane organic compounds (“NMOC”) when the estimated NMOC emissions exceed 50 megagrams per year. A review was done of a Tier II Report conducted by Cornerstone Environmental Group in May 2010. The report concluded that Kimble Sanitary Landfill’s NMOC emissions were less than 50 megagrams (29.4 megagrams in 2010) and projected to be 30.8 megagrams for 2011. For the remaining years through 2014, their NMOC emissions were projected to be well under the 50 megagrams threshold. The report concluded that Kimble Sanitary Landfill is not required to capture and destroy landfill gas under federal regulations.

NSF-ISR examined the “Attestation of Voluntary Implementation” signed by Keith Kimble, (President), Penn-Ohio Coal Company, on 15 June 2011, attesting that there were no regulatory requirements that required capture and destruction of landfill gas at Kimble Sanitary Landfill, and found the document to be free from defect. On the basis of all the evidence considered, NSF-ISR has concluded that Kimble Sanitary Landfill has met the Legal Requirements Test.

Performance Standard Test: Per the protocol, projects must pass the Performance Standard Test – a standard of performance applicable to all landfill projects. According to the Landfill Engineer for Kimble Sanitary Landfill, there was no landfill gas ever destroyed, actively or passively, prior to the project and there was no evidence of a previous flare(s) onsite. A visit to the site and interviews with site and project development personnel confirmed as-built drawings and engineering specifications/construction documents, showing the installation of new collection and destruction equipment as of the dates specified in the documents.

As a result, NSF-ISR verification activities show evidence that the site was not collecting and destroying landfill gas prior to the project start date and is considered “additional” under “Scenario 1” of the protocol – i.e. *“Installation of a landfill gas collection system and a new qualifying destruction device at an eligible landfill where landfill gas has never been collected and destroyed prior to the project start date.”*

Regulatory Compliance: NSF-ISR reviewed a sample of regulatory compliance documents of the Kimble Sanitary Landfill site, including: Ohio EPA’s (“OEPA”) “Municipal Solid Waste Landfill Permit” (9 June 2010); OEPA’s Air Permit (“Permit to Install”, 5 June 2008) and OEPA’s “Wastewater Discharge Permit” (7 June 2007). These permits included, as applicable, inspection frequencies, sampling frequencies and reporting requirements. NSF-ISR verified that these permits were all current.

In addition, NSF-ISR reviewed the processes in place at Kimble Sanitary Landfill for on-going monitoring of regulatory compliance to Federal, State and local regulations and related permit requirements. This was done through a review of the regulatory monitoring plan described in Kimble Sanitary Landfill’s “Project Design Document” and interviews with both Kimble Sanitary Landfill’s Landfill Engineer, the Landfill Manager of Operations and the Gas Systems Technician. It was found that there were good controls in place for monitoring regulatory requirements during the project reporting period.

Prior to the start of this project there were Notices of Violation (“NOV’s”) filed by the Ohio EPA relating to leachate management and daily cover. The last NOV was filed 7 March 2009 – prior to the project start date of 28 December 2009. All NOV’s were finalized and closed out on May 27, 2010 (verified by

“Director’s Findings and Orders” from the Ohio EPA). It was noted that, although passive vents were installed as one of the corrective actions, there were no requirements to destroy the gas that was being vented. NSF verified that there were no past NOV’s that exhibited a state of recurrent non-compliance as a result of negligence or intent and no new NOV’s during the reporting period.

NSF-ISR examined the “Attestation of Regulatory Compliance” signed Keith Kimble, (President), Penn-Ohio Coal Company on 15 June, 2011 and found the document free of apparent defect. This attestation was on file in the Reserve’s database.

3.4 Ownership

Penn-Ohio Coal Company D.B.A Kimble Sanitary Landfill claims the rights to any greenhouse gas emission reduction credits relating to this landfill project. NSF-ISR conducted a review of OEPA’s “Indirect Discharge Permit” which references “Penn-Ohio Coal Company D.B.A Kimble Sanitary Landfill in the permit.

We reviewed a document entitled “Renewal of Trade Name Registration” (Registration #1066651, from the Ohio Secretary of State’s Office) that established that the trade name of “Kimble Sanitary Landfill” is an Ohio corporation listed under “Penn-Ohio Coal Co.” This document was signed by the Treasurer (Doris Kimble) of Penn-Ohio Coal Company

In addition, we reviewed the relationship of Element Markets, LLC to Penn-Ohio Coal Company D.B.A Kimble Sanitary Landfill. NSF-ISR examined an agreement (“Carbon Credit Development and Management Agreement” dated 18 December 2009) stating that Element Markets, LLC would work together with the project developer to, among other things, assist with monitoring, verification and issuance of carbon credits that may be generated by this project.

NSF-ISR also examined a “Project Developer’s Attestation of Title” completed by Penn-Ohio Coal Company D.B.A Kimble Sanitary Landfill (Keith Kimble, President, 15 June 2011) on file in the Reserve’s database and found it to be free from defect. From the above evidence, NSF-ISR has concluded that Penn-Ohio Coal Company D.B.A Kimble Sanitary Landfill owns and operates the Kimble Sanitary Landfill, there is no evidence that the gas rights and/or carbon credits have been sold or contracted to another party and that Penn-Ohio Coal Company D.B.A Kimble Sanitary Landfill owns the carbon credits and environmental attributes associated with the landfill.

3.5 Project Boundaries and Emission Sources

NSF-ISR reviewed the project boundaries per the requirements of the protocol and found that the assessment boundaries correctly begin with the project landfill gas collection system (gas wells and lateral collectors) in the well field leading to a blower/flare skid and associated valves and instrumentation and ending with the flare itself. NSF-ISR found that there were no engines, turbines, boilers or other devices and that the flare was the sole destruction device.

Sources, Sinks and Reservoirs. The Project accounted for the following sources, sinks and reservoirs (SSRs) identified in the Landfill Project Protocol: SSR 4, Waste Breakdown, SSR 5, Gas Collection, SSR 6, Supplemental Fuel, and SSR 9 CH₄ emissions from Project LFG Flare Destruction. Landfill Project Protocol default destruction efficiencies were correctly applied to account for incomplete combustion of methane by the flare. Specific sources included the following:

- CO₂ from the oxidation of CH₄ by soil bacteria. As the landfill is not covered by a synthetic liner, the Landfill Project v. 3.0 Reporting Protocol's assumption that 10 percent of the methane produced would be naturally oxidized by soil bacteria has been applied.
- Uncontrolled GHG released from the landfill.

GHG sources, sinks and reservoirs associated with the project:

- CH₄ from the incomplete combustion of CH₄ in the flare.
- CO₂ from the combustion of fossil fuels used during operation and maintenance activities for the project activity.
- CO₂ resulting from the consumption of imported electricity.
- The gases reviewed include CO₂ and CH₄. All gases have been converted to CO₂ equivalents.

3.6 Performance Against Project Protocol/Methodology

During the site visit, a review of the project greenhouse gas management system was conducted with the project developer. This review included a detailed look at the project data handling and processing procedures, recordkeeping and data storage and the quality control and assurance procedures. The following is the result of this review.

NSF-ISR reviewed Kimble Sanitary Landfill's "Project Design Document" We reviewed this document both in the document review stage of our verification process and on-site to verify monitoring activities and records against this document. A monitoring plan for the reporting period 1 January 2010 through 31 March 2011 was verified from this document. NSF-ISR verified that this monitoring plan was implemented correctly and meets the monitoring requirements of the protocol.

Although the project start date was 28 December 2009, there were no credits claimed until 1 January 2010. This was due to the fact that not all protocol requirements were met before this date. The Methane Analyzer and the gas flow meter were not "cleaned and inspected on a quarterly basis" per protocol requirements.

During the reporting period, the operation of the flare was continuously monitored using a thermocouple located within the flare shroud connected to a Yokogawa digital data logger to sense temperature and providing information for calculating the operation times of the flare. We confirmed that all data points were deleted (from data spreadsheets that were designed to disregard low temperatures) for all temperature readings below 500°F.

LFG flow was measured continuously and recorded every two minutes (from 28 December 2009 to 2 March 2010) and every 4 minutes (after 3 March 2010) using a Fluid Components (FCI) Model #ST98 flow meter and later using an FCI Model ST51 flow meter.

The FCI measurement devices automatically adjusted flow to compensate for the temperature and pressure of the LFG stream. The factory calibrations were configured to measure flow (scf) at 70°F and 14.7 psia. All flow data were adjusted to account for temperature at 60 °F and 14.7 psia in order to satisfy protocol requirements. We sampled the raw data spreadsheets at various points to verify that the proper corrections were made.

The protocol requires that methane is measured continuously, recorded every 15 minutes and averaged at least daily. With data information seen on the monitoring equipment during our site survey and with the

inspection of samples of the raw data and spreadsheet calculations, we concluded that methane was measured continuously and recorded and averaged per protocol requirements. A Siemens Ultramat 23 continuous gas analyzer connected to a Yokogawa digital data recorder was the system used throughout the reporting period to monitor methane. In addition, portable methane measurements were taken and recorded as one part of Kimble's QC checks.

The Yokogawa digital data recorder stored the data on a compact flash drive and in its internal memory. The individual daily files were then downloaded every two weeks by KSL staff and sent to Element Markets. The files were automatically converted and stored in Element Markets LLC's internal server. The data was processed and stored in a Microsoft database. From this database, the data was queried and downloaded into Excel files to aggregate amounts and to calculate total emission reductions.

Raw data samples and weekly data samples were taken during the verification per a sampling plan. Each sample was examined for periods where there were no data, data reported as "0", any periods of sudden variation, periods where methane concentrations temperatures or flows were missing and other anomalies. These periods were correlated through interviews with personnel and logbooks with times where the flare was down due to equipment issues, weather-related, electrical outages, maintenance, etc. The samples showed that the Excel spreadsheets were filtering out the data per the parameters stated above and no emission reductions were claimed during those periods.

NSF-ISR verified that the required documents for the project's reporting period had been completed and submitted to the Reserve. These included the signed Attestation of Title, the signed Attestation of Voluntary Implementation and the signed Attestation of Regulatory Compliance.

3.7 Project Management System

The project management system was described in "Project Design Document: Kimble Sanitary Landfill Gas Project" written by Element Markets LLC. This Project Design Document incorporated a description of the relationship/ responsibilities of all parties connected with the project, a detailed description of the project, calculation methodologies and a monitoring plan to track emission reductions. In addition, the plan included monitoring details of landfill gas delivered to the flare, the monitoring of the percent of methane content and the monitoring of flare temperatures to ensure complete destruction of methane. This document was verified to address the requirements of Version 3.0 of the Landfill Project Reporting Protocol.

It should be noted that a rental flare skid was used from 28 December 2009 until the end of April 2010. On 4 May 2010, the permanent skid became operational.

The FCI flow meters were verified by records as inspected, cleaned as needed and field-checked for calibration by two outside contractors - Monitoring Compliance and Control, Inc. ("MCC") and Shaw LFG Specialties or by qualified KSL personnel on a quarterly basis.

In addition, we verified that Kimble Sanitary Landfill's calibration procedure followed the recommended field check calibration procedure and the protocol's requirement of a confirmation of accuracy below a $\pm 5\%$ threshold for both the rental skid and the permanent skid – except for one exception noted here:

The 3 December 2010 flow check by MCC showed a drift above the 5% threshold allowed by the protocol. Kimble Sanitary Landfill management then contracted with Shaw Specialties to get a second opinion. Shaw confirmed that the flow meter was under-reading, determined the appropriate variation

percentage of 24.5% and field calibrated the meter per the manufacturer's instructions. With all parties in agreement, the flow meter was sent back for maintenance, inspection and calibration by the manufacturer. No damage was found by the manufacturer, but was factory calibrated. During that time period, a rental flow meter (SN: R339696) was installed onsite in March when the flow meter was factory calibrated. Per protocol guidelines, we confirmed that all flow values were used without adjustment during this period when calibrations indicated under-reporting.

The last calibration date (a manufacturer's factory calibration) for the flow meter on the permanent skid was 30 March 2011—well within the protocol requirements that the last field check must not be more than two months before the end of the reporting period.

The Siemens Ultramat 23 gas analyzer (used for continuous methane monitoring) was verified by records as inspected, cleaned as needed and field checked for calibration on a quarterly basis by an outside contractor, Apply Tech. None of these calibrations showed a drift that was beyond the $\pm 5\%$ threshold per protocol requirements.

We verified that the last calibration date for the Siemens Ultramat 23 gas analyzer was 30 March 2011—well within the protocol requirements that the last field check must not be more than two months before the end of the reporting period.

Through an examination of Kimble's "Project Design Document" and interviews with a representative from Element Markets LLC and with Kimble's Gas System Technician, internal procedures were described for daily flare data monitoring which includes monitoring of periods of unusual flow/temperature, gaps, etc. In addition, internal procedures were described for checking the accuracy of the calculations, review of the raw data, methane readings, flare temperatures, Excel formulas, etc. We found the combination of the QA/QC processes used by both Kimble Sanitary Landfill personnel and by Element Markets, LLC to be robust.

The Project Description Document outlined procedures that described what records would be kept, by whom and for how long. In general, records are stored for a period of 10 years after the information was generated or 7 years after the last verification. In addition, data were backed up on a separate system in Austin, Texas, every night.

The Project Description Document also outlined how applicable local, state and national regulations and permit requirements are monitored on an ongoing basis. This was verified by an interview with Kimble Sanitary Landfill's Landfill Engineer who has responsibility of adhering to and monitoring these regulations.

NSF-ISR found an adequate control environment per the documented project management system for the project for the reporting period, including a record-keeping plan, monitoring of landfill regulations, the role of individuals performing specific monitoring activities and QA/QC provisions to ensure that data acquisition and meter calibrations were carried out consistently and with precision.

3.8 Calculation of GHG Emission Reductions

Monitoring Plan data calculation procedures were reviewed for consistency with the Landfill Project Reporting Protocol v. 3.0 requirements as part of this verification. NSF-ISR independently calculated the data based on the calculations in the Protocol and found Kimble Sanitary Landfill's claimed emission reductions varied from ours by less than .01 percent for both 2010 and 2011.

NSF-ISR independently verified calculated project emission reductions for the years 2010 and 2011 from information on data calculation spreadsheets. Landfill Gas Destruction Project emission reductions were calculated per the formula defined in the Climate Action Reserve Landfill Gas Reporting Protocol version 3.0. The basic formula for determining GHG emission reductions of the project activity during the reporting period was:

- Baseline emissions (in tonnes CO₂e) – Project emissions (in tonnes CO₂e)

The formula for determining Baseline emissions was:

- The total Methane destroyed: The total quantity of landfill methane sent to the destruction device X the destruction efficiency of the open flare (.96)
- Methane destroyed (above) converted to CO₂e
- Less the oxidation factor

The formula for determining Project emissions was:

- The fossil fuel emissions used for the project, converted to CO₂ (in this case, the propane used for flare start ups.)
- The total annual electricity consumed by the project landfill gas project (with conversion factors to convert from MWh to CO₂, and then conversion of lb/CO₂ to tonnes of CO₂.)

= Project Emission Reductions.

Note: For this project, there was no supplemental natural gas utilized, nor were there any pre-project destruction devices, so there was no need to calculate these factors. NSF-ISR further verified the data for accuracy, based on its sampling plan, the trail of data beginning from the raw data outputs to the spreadsheets capturing this data to the final calculations. NSF-ISR independently calculated the data based on the calculations in the Protocol and found Kimble Sanitary Landfill's claimed emission reductions were fairly stated.

No flow rates were substituted during the reporting period, nor any substitutions for missing methane data.

3.9 Corrective Action Requests/Recommendations

NSF-ISR issued corrective actions and one recommendation for improvement for this project. All material and immaterial issues were resolved. Details on the corrective actions, recommendation and clarifications requested were provided to the Project Developer and to the Reserve in a List of Findings, a private document.

3.10 Approved Variances or Deviations

There were no requested variances or approved deviations for this project.

4. Verification Results

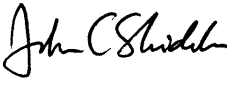
4.1 Verification Team Recommendation:

Based on the verification activities described above, the verification team has concluded that the Kimble Sanitary Landfill's project has achieved the following emission reductions:

Vintage Year :	Baseline Emissions	- Project Emissions	- Adjustments	= Metric tons CO ₂ -e Removals (net)*
2010	70,261.54	71.54	0	70,190
2011	23,199.86	17.50	0	23,182

* Rounded Down

4.2 Verification Audit Summary:

Project Developer	Penn-Ohio Coal Company, DBA Kimble Sanitary Landfill 3596 State Route 39 NW Dover, Ohio, USA 44622
Project Location	Kimble Sanitary Landfill 3596 State Route 39 NW Dover, Ohio, USA 44622 Lat: 40 30' 00" N/ Long: 81° 31' 19" W
Project Type	Landfill Gas Capture/Destruction
Reporting Period	1 January 2010 through 31 March 2011
Protocol Methodology	Climate Action Reserve, Landfill Project Protocol, Version 3.0
Emission Reductions Verified	Vintage 2010: 70,190 metric tons of CO ₂ -e Vintage 2011: 23,182 metric tons of CO ₂ -e
Verification Conclusion	Based upon the above, NSF-ISR has concluded that Kimble Sanitary Landfill's 2010 vintage methane emission reductions of 70,190 metric tons (CO ₂ -e) and 2011 vintage methane reductions of 23,182 metric tons (CO ₂ -e) reported to the Climate Action Reserve are, in all material respects, fairly stated.
Lead Verifier	 Mark Lutz, 2011-08-16
Internal Reviewer	 John Shideler, 2011-08-17
<i>This verification statement is valid when signed and dated by an NSF-ISR internal reviewer.</i>	