RUBY CANYON ENVIRONMENTAL

Verification Report

CAR639 – El Dorado Nitrogen LP Nitrous Oxide Abatement Project
Reporting Period: April 8, 2022 – October 12, 2022

Prepared for:

LSB Industries, Inc.

December 22, 2022

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1.0 Introduction

Ruby Canyon Environmental, Inc. (RCE) was contracted by ClimeCo LLC (ClimeCo) to perform the verification of the El Dorado Nitrogen, LP - Nitrous Oxide Abatement Project (Project) for the reporting period April 8, 2022 through October 12, 2022 to the Climate Action Reserve (Reserve) Nitric Acid Production Project Protocol Version 2.2 (Protocol). The Project involves GHG emission reductions from the destruction of nitrous oxide (N_2O).

1.1 Project Background & Site Description

The Project activity consists of the installation and operation of a secondary abatement catalyst at an existing nitric acid plant in Baytown, TX. As part of the Project, a secondary catalyst was placed in the ammonia oxidation reactor (AOR), immediately downstream of the ammonia oxidation catalyst, catalytically reducing the nitrous oxide (N_2O) that would have otherwise been vented to the atmosphere. The Project is located at El Dorado Nitrogen, LLC's (EDNLLC) facility which is situated on a larger chemical production facility owned by Covestro, LLC. The nitric acid from the EDNLLC's facility is used on site by Covestro for the manufacture of methylene diphenyl diisocyanate. The project developer is LSB Industries, Inc. (LSB), and its wholly owned subsidiary, EDNLLC, provided the Project monitoring and data gathering on behalf of LSB Industries, Inc.

This is the verification of the twenty-third reporting period for the Project. The reporting period includes one campaign: Campaign 42 from April 8, 2022, to October 12, 2022.

1.2 Responsible Parties

<u>LSB Industries, Inc. (Project Developer)</u>
16 S. Pennsylvania Ave.
Oklahoma City, OK 73107

<u>El Dorado Nitrogen, LLC (Nitric Acid Plant Operator)</u>
8490 West Bay Road
Baytown, TX 77520

<u>ClimeCo LLC (Technical Consultant)</u>
10 North Reading Avenue
Boyertown, PA 19512

1.3 Verification Team

The RCE verification team consisted of the following individuals who were selected based upon verification experience under the Reserve's program and knowledge of U.S. EPA regulations and the nitric acid plant sector.

Lead Verifier: Phillip Cunningham
Team Members: Garrett Heidrick, Issai Medellin
Senior Internal Reviewer: Nina Pinette

1.4 Objectives

The goal of the verification activities was to ensure that the claimed GHG emission reductions are complete, consistent, accurate, transparent, and permanent and that the Project was in compliance with the Protocol's project additionality, monitoring, and reporting requirements. Furthermore, the

verification activities ensure that the data provided to RCE is well documented and free of any material errors or omissions.

1.5 Scope

The scope of the verification consisted of the following independent and objective activities:

- Review the Project Monitoring Plan,
- Review Project boundaries,
- Review Project eligibility,
- Review Project data acquisition and quality control procedures,
- Review Project's historical campaign data and calculation of permitted operating conditions and HNO_3max,
- Review the Project's baseline emissions data,
- Review the Project's emission reduction calculations,
- Review Project documents and data against the Verification Criteria listed in Table 1,
- Issue requests for corrective actions, non-material findings, additional documentation, and clarifications, as necessary, and
- Issue a Verification Report, List of Findings, and Verification Statement to ClimeCo and the Reserve.

1.6 Verification Criteria

Table 1 - Verification Criteria

Criteria	Details
Standard of Verification	• Nitric Acid Production Project Protocol Version 2.2 (April 18, 2019) (Protocol) • Verification Program Manual (February 3, 2021) • Reserve Offset Program Manual (March 12, 2021) • Policy Memo: Use of Global Warming Potential Values for All Offset Protocols (July 13, 2022)
Verification Process	The Reserve Verification Program Manual and ISO 14064-3:2006 "Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions"
Level of Assurance	Reasonable assurance
Materiality	99% materiality threshold (<1% error) because total annual ERs are >100,000 tCO_2e.

2.0 Verification Activities Summary

RCE developed a verification plan to be followed throughout the verification. The verification plan consisted of the following activities:

- RCE completed the Project NOVA/COI form to identify any potential conflicts of interest with the Project or Project developer. The NOVA/COI form was submitted to the Reserve's online registry, and the COI assessment revealed no conflicts of interest and was approved by the Reserve on November 7, 2022.
- RCE held a verification kickoff meeting with ClimeCo on November 10, 2022. During the kickoff meeting RCE reviewed the verification objectives and process, the verification schedule, and requested the verification background documents.

- RCE performed a strategic review and risk assessment of the received data and support documents to understand the scope and areas of potential risk in the GHG emissions reductions.
- RCE developed a risk-based sampling plan based upon the strategic review and risk assessment. The verification plan and sampling plan were used throughout the verification and were revised as needed based upon additional risk assessments.
- RCE conducted a virtual site visit to the Project on February 18, 2022 using the real-time video web meeting and screen sharing platform Microsoft Teams. During the site visit RCE inspected the continuous emission monitoring system (CEMS) equipment; observed the onsite GHG management systems and data gathering, monitoring and handling practices; and interviewed key personnel.
- RCE conducted a detailed desktop review of submitted material including evidence of regulatory compliance, documentation of ongoing QA/QC procedures, source data, and emission reduction calculations.
- RCE submitted requests for corrective actions, non-material findings, additional documentation, and clarifications, as necessary to ClimeCo throughout the verification.
- RCE's Senior Internal Reviewer conducted a review of the verification sampling, Verification Report, and Verification Statement.
- RCE issued a final Verification Report, Verification Statement, and List of Findings.
- RCE held an exit meeting with EDNLLC and ClimeCo.

3.0 Verification Findings

3.1 Assessment of the GHG Reduction Project Operations

The Project currently destroys N_2O from a nitric acid plant (NAP) via a secondary abatement catalyst located within the AOR, immediately downstream of the ammonia oxidation catalyst and upstream of the absorption tower. The N_2O emissions per unit of nitric acid production were measured during the baseline campaigns using only a primary catalyst in the ammonia oxidation process. The monitoring procedure was repeated in the project campaign after the secondary abatement catalyst was installed in July 2010. During the verification of the first reporting period of the Project, RCE confirmed that the plant did not use NSCR technology for NOx abatement at any point within 24 months prior to the effective date of the Protocol.

The flue gas flow rates and N_2O concentrations are monitored continuously using a CEMS. The process control system monitors process temperature, pressure and ammonia-to-air ratio on a continuous basis and records the data multiple times each hour in the process data historian, meeting Protocol requirements. RCE verified that the Project Monitoring Plan and implementation upholds the monitoring criteria and monitoring frequency as specified in Table 6.1 of the Protocol. Official nitric acid production data required by the Protocol is measured and recorded on a daily basis and recorded in the operation logbook and is the same data provided for financial reporting by EDNLLC's accounting department.

RCE verified that all CEMS installation and certification requirements were met and that all historical and baseline parameters were calculated and measured correctly during the verification of the first reporting period, July 1, 2010 – October 15, 2010. RCE confirmed that all historical and baseline parameter values used in the project emissions calculations for this reporting period were the same values used in the previous reporting periods. RCE reviewed calibration records and accuracy testing of the project monitoring equipment and verified the data management systems in place at the EDNLLC facility.

RCE also reviewed company records of NAP operation, maintenance and downtime and verified that the

CEMS monitoring reports that EDNLLC provided to ClimeCo were used as the raw data for the GHG assertion. RCE determined that the methodology defined in the Monitoring Plan Version 7.0 was correctly applied and is in accordance with Section 6.4 of the Protocol.

3.2 GHG Project Boundary (sources, sinks and/or reservoirs)

According to the Protocol, N_2O is the only GHG included from the Baseline and Project activities for secondary abatement projects.

Table 2 lists the sources of GHG emissions reviewed during the verification of the Project.

Table 2 - Project GHG Sources, Sinks and Reservoirs

Activity	GHG Sources, Sinks & Reservoirs
Baseline	• N_2O vented to the atmosphere.
Project	• N_2O vented to the atmosphere

3.3 Project Eligibility Criteria

The Protocol specifies five eligibility rules that GHG Project developers must meet to register reductions with the Reserve. Below is a summary of the Protocol's eligibility rules and the Project's compliance to each requirement.

- **Eligibility Rule I: Location**
  The Project is a U.S. based project located at a nitric acid production facility in Baytown, TX, USA and therefore meets this eligibility requirement.

- **Eligibility Rule II: Project Start Date**
  During the first verification, RCE reviewed documentation that showed that the plant operations completed a campaign on June 26, 2010 and that the secondary abatement catalyst was installed and the primary catalyst gauze replaced before the start of the next campaign. Records showed the commencement of nitric acid production for the first reporting period campaign on July 1, 2010. RCE confirmed that the project start date was July 1, 2010.

- **Eligibility Rule III: Project Crediting Period**
  The crediting period for a nitric acid project is approximately ten years in length and aligns with the end of the last full campaign that begins in the tenth year of reporting. This reporting period is within the Project's second crediting period which began on December 7, 2020, and is estimated to end on or around December 6, 2030.

- **Eligibility Rule IV: Additionality**

  <u>Legal Requirement Test</u>
  RCE reviewed EDNLLC's most recent Title V permit and confirmed that EDNLLC does not have a PSD permit for greenhouse gases. In addition, EDNLLC provided evidence that they receive regular updates regarding U.S. EPA and State of Texas rules regarding possible GHG emission standards. RCE also verified that LSB accurately completed the Attestation of Voluntary Implementation form and uploaded it to the Reserve.

  <u>Performance Standard Test</u>

  RCE verified that the Project satisfies the Performance Standard by installing a new secondary N2O abatement catalyst. During the first verification, RCE reviewed evidence of the purchase and installation of the catalyst.

- **Eligibility Rule V: Regulatory Compliance**
  RCE verified that the Project was in material compliance with all applicable laws throughout the reporting period. RCE reviewed both the Texas Commission on Environmental Quality (TCEQ) and the U.S. EPA ECHO database for any entries associated with the facility. There was no evidence of any environmental non-compliance during the reporting period.

  Finally, RCE verified that the Attestation of Regulatory Compliance was correctly completed and uploaded to the Reserve.

3.4 Ownership of GHG Reductions

RCE reviewed evidence that EDNLLC is a wholly owned subsidiary of the project developer, LSB Industries, Inc. and is the operator of the project. RCE also reviewed a confirmation of assignment letter dated December 14, 2010 signed by both EDNLLC and LSB Industries, Inc. confirming that El Dorado Nitrogen, LP has assigned LSB Industries Inc. the emission reduction rights for the project. ClimeCo only serves as a technical consultant for the Project. ClimeCo stated that there have been no changes from the previous reporting period. RCE verified that the Attestation of Title was correctly completed and uploaded to the Reserve.

3.5 Assessment of Information System Controls

During the verification of a prior reporting period, RCE performed a virtual site visit that included a review of management systems, onsite procedures, and interviews with key Project personnel. The review included confirming that the Project monitoring was done through direct measurements from a CEMS for both gas flow rates and N_2O concentration. The Project uses a Kurz thermal resistance mass flow meter (model 155-A) to measure gas flows and an EcoChem MC3 infrared analyzer (Model MC3) to measure N_2O concentration. RCE inspected the locations of the sample probes within the stack during a previous site visit and no changes to the equipment locations were noted.

The Project proponent upgraded the DAHS when the Project secondary catalyst was installed. EcoChem's MC3 analyzer control system is coupled with a CEMTrac Windows based computer that is used for CEMS data generation. The record keeping and reporting of the data are processed by The CEMTrac computer which monitors the CEMS status. A Modbus Interface (MBIF) is used for data feeds from the distributive control system and fed to the CEMTrac program. During the previous verification site visit, RCE verified that the CEMTrac software is used to generate reports in the required formats and provides those reports to plant management and the company server used to back-up the plant data.

Each weekday the status of the CEMS is checked by the Process Manager via the CEMTrac display, and any necessary corrective action is taken as appropriate and documented in the CEMTrac "Environmental Log".

3.6 CEMS Installation and Certification

The Protocol states that project developers must follow the following CEMS installation and certification requirements:

- 40 CFR Part 60, Sec. 60.13
- 40 CFR Part 60, Appendix B, Performance Specification 2
- 40 CFR Part 75, Appendix A, Sec. 6

The CEMS was installed several years prior to the project start date. The Kurz flow meter was installed in 1999 and the Temet N_2O analyzer (analyzer in place prior to the EcoChem MC3) was installed in 2003 for

NO_x compliance reasons. At the time, the CEMS installation met the requirements of 40 CRF Part 60, Appendix F.

RCE verified that the Project met all CEMS installation and certification requirements during the first verification. During those verification activities, RCE discovered that a variance and clarifications to the Protocol were necessary to address many of the CEMS installation and certification issues. As a result, RCE verified the CEMS installation and certification against the Protocol, the Variance Determination dated June 15, 2010 and the Errata and Clarifications to Nitric Acid Production Project Protocol, version 1.0 dated March 17, 2011.

RCE verified that the following requirements were met for installation and certification of the CEMS:

7-day Calibration Error Test:
ClimeCo submitted the calibration drift summary for September 15-21, 2009. This was before the baseline sampling period began. The drift never exceeded 5 percent and is in compliance with 40 CFR Part 75.

Linearity Check:
The project was granted a variance from Reserve on June 15, 2010 that allowed the April 2010 Linearity Check to take the place of the Check required for the initial certification. The analyzer met the linearity check requirement of <5.0% error.

RATA and bias tests:
ClimeCo provided the results of the RATA that was conducted on September 22, 2009. The analyzer failed to meet the bias test requirement; however, the bias adjustment factor (BAF) was applied correctly to the N_2O concentration in the stack gas (NC_{SG}).

Cycle Time Test:
ClimeCo provided the document EDN Cylinder Gas Audit and a memo to demonstrate that the analyzer meets the 40 CFR Part 60.13 (e) 2 requirement that the CEMS complete a minimum of one cycle of operation for each 15 minute period.

RCE verified that the Project met all Protocol requirements for CEMS installation and certification or that the Project was approved to apply methods outlined in the variance determination.

3.7 Ongoing CEMS QA/QC Program

RCE confirmed that the Project met the ongoing CEMS QA/QC requirements throughout the reporting period.

3.7.1 Daily Requirements

The Process Manager of EDNLLC demonstrated the capabilities of the DAHS and how daily checks were performed for calibration error and adjustments, data validation, quality assurance and data recording for the analyzer and flow meter. The DAHS records Project data necessary to demonstrate operation within the allowable operating conditions (AOCs). RCE confirmed the Project met all Protocol daily requirements using DAHS including:

- Calibration error test for N_2O analyzer
- Calibration adjustments for N_2O analyzer
- Data validation
- Quality assurance
- Data recording

RCE reviewed copies of the calibration check reports for the entire reporting period for the N_2O analyzer.

All daily calibration error checks performed during the reporting period were either within the +/-5% error threshold required by the Protocol or if were found to be out of calibration, were immediately re-calibrated until the equipment was shown to be reading correctly.

3.7.2 Quarterly Requirements

RCE verified that the following quarterly assessments were performed according to Protocol requirements:

Calibration Error Test:

EDNLLC performs calibration error checks daily, which exceeds the Protocol requirement to conduct quarterly checks. RCE reviewed copies of the calibration check reports for the entire reporting period for the flow meter. All daily calibration error checks performed during the reporting period were either within the +/-3% error threshold required by the Protocol or the instrument was re-calibrated immediately after a failed calibration check.

RCE also confirmed that calibration adjustments are performed, if necessary, data is validated, data is continuously monitored and recorded every minute, and QA checks are performed.

Leak Check:

The Project utilizes a thermal mass flow meter; thus this quarterly assessment is not required.

Flow-to-Load or Heat Rate Evaluations:

The Protocol states that units not producing electrical output or thermal output are exempted from the flow-to-load ratio test requirements. The Project meets this exemption and is therefore not required to perform this quarterly assessment.

Linearity Checks

RCE confirmed that the quarterly linearity checks were performed for the N_2O analyzer. Linearity checks were conducted for the analyzer in each quarter during the project campaign that did not include a RATA for the analyzer: on September 7, 2022 (quarter 3, 2022). RCE verified that the results of all checks met Protocol and Part 75 requirements. The results were within the required range (<5%) for low-level, mid-level, and high-level gas concentrations. The analyzer had a RATA in the second quarter of 2022, and the fourth quarter linearity check was conducted after the end of the reporting period.

Data Validation

RCE confirmed that the results of all QA/QC checks were within the ranges required by the Protocol and 40 CFR Part 75 Appendix B requirements.

3.7.3 Annual and Semi-Annual Assessments

RCE reviewed the results of the RATAs conducted on May 4, 2022 for all equipment. Alliance Source Testing, LLC conducted the RATAs using test methods in accordance with 40 CFR, Part 75, Appendix A.

The results are shown in Table 3, below.

Table 3 – RATA Results

Equipment	5/4/2022
N_2O Analyzer	2.19%
Flow Meter	0.59%

The results of the RATAs for all instruments showed the relative accuracy to be within the acceptable

range (below 10%) and below 7.5 percent. Based on the RATAs, all project equipment will require annual RATAs.

As a result of the bias tests, the analyzer and flow meter both required a BAF for portions of the reporting period. RCE verified that the BAFs were applied automatically to the raw data.

Table 4 - Bias Adjustment Factors

Equipment	4/8/2022 – 5/3/22	5/4/22 – 10/12/22
N_2O Analyzer	1.032	N/A
Flow Meter	1.017	1.003

3.7.4 Missing Data Substitution

During the Project campaign missing data substitution methods were applied for a total of 3 hours for N_2O concentration and 0 hours for flow rate. The DAHS automatically performs data substitution. RCE reviewed evidence that the DAHS correctly applied missing data substitution methods during the reporting period according to 40 CFR Part 75, Section 75.33 missing data procedures.

3.8 Assessment of GHG Emissions Reductions Calculations

The emission reduction calculations assessment included a review of the historical, baseline, and Project assumptions, data inputs, data management and accuracy of calculations. During the first verification, RCE assessed the information generated from the Historical and Baseline campaigns. RCE first evaluated the completeness and validity of the original data and how the data is transferred from EDNLLC's CEMS information control systems to ClimeCo's GHG calculation database.

The Protocol requires a series of data analyses and calculation steps to quantify the GHG emission reductions. ClimeCo managed the data in a Microsoft Access database file using various queries of the raw data and provided the data to RCE in a MS Excel spreadsheet. RCE reviewed the queries/formulas and data outputs for compliance with the Protocol.

RCE confirmed that all data was normalized to 0°C and 101.325 kPa in the calculation database/spreadsheets. ClimeCo also performed unit conversions for some monitoring parameters, and RCE confirmed that the conversions were performed correctly and that the raw data was converted to the units required by the Protocol for all parameters.

<u>Historical Campaigns</u>

RCE reviewed historical data during the first verification when ClimeCo provided data from five previous campaigns dating from April 28, 2006 to February 17, 2009. RCE assessed the raw data and statistical adjustments from the Historical campaigns that were used to calculate two variables: $HNO_{3,MAX}$ and CPV_{cap}. To confirm that $HNO_{3,max}$ was calculated correctly, RCE recalculated the value by determining an average HNO_3 production number in metric tons per day for each of the five historical campaigns and selecting the highest of the average values as the $HNO_{3,max}$. RCE verified the values of each parameter from the historical data.

- $HNO_{3,MAX}$ = 49.19 metric tons HNO3/hr
- CPV_{cap} = 210,633 metric tons HNO3.

During a previous reporting period, El Dorado Nitrogen, LP and ClimeCo made the decision to optimize the operating parameters for the Project. This was classified as an "upgrade," and thus the Project needed to revise its previously defined AOCs. The new AOC ranges and values were determined by operating manuals for the existing equipment and by guidance from the ammonia oxidation catalyst manufacturer. The AOCs were revised according to the Protocol steps outlined in Section 5.1.2 for an "upgrade" at the

facility as well as additional Reserve guidance. All previous AOCs were revised, including:

- Oxidation temperature: min. = 840°C, max. = 920°C
- Oxidation pressure: min. = 3.03 bar, max. = 4.86 bar
- Ammonia-to-Air Ratio: max. = 10.4%

RCE confirmed that the values for each AOC were used in the calculations for this Project campaign.

Baseline Emissions

RCE reviewed baseline data during the first verification when ClimeCo provided data from the Baseline campaign conducted immediately prior to the installation of the secondary catalyst from November 3, 2009 to June 27, 2010. However, the Baseline campaign exceeded the CPV_{cap} at 9:00am on May 22, 2010. As a result, ClimeCo used only data prior to that point to determine the Baseline calculation parameters. RCE verified that the raw data from the Baseline campaign was correctly adjusted in accordance with the Protocol and used to determine the Baseline Emission Factor. RCE verified the assumptions and variables used for Equations 5.4 and 5.5 in the Protocol. The results are as follows:

- $N_2O_{conc,BL}$ = 2,136 mgN2O/m3
- F_{BL} = 165,227 m3/hr
- $HNO_{3,BL}$ = 186,595 metric tons HNO3

RCE verified that the Project's Baseline campaign operated inside the established AOCs approximately 91 percent of the time, thus exceeding the 50 percent requirement in the Protocol.

RCE also verified that the statistical comparison of allowable and baseline operating conditions was performed according to the Protocol and that all parameters fall within the 95% confidence interval.

RCE confirmed that values for each baseline parameter used in calculations for this reporting period were the same values verified during the previous verifications.

Project Emissions

RCE verified that the raw data from the Project campaign was correctly adjusted in accordance with the Protocol and used to determine the campaign-specific project emissions. RCE verified the assumptions and variables used for Equation 5.7 in the Protocol. The results are as follows:

- OH = 4,114.32 hours
- $N_2O_{conc,n}$ = 297.77 mgN2O/m3
- F_n = 137,127.51 m3/hr
- N_2O_n = 168.00 tN2O

RCE verified that the EDNLLC's Project campaign operated inside the established AOCs over 99% of the time, thus exceeding the 50% requirement in the Protocol. RCE confirmed that the operating conditions during the Project campaign are representative of AOC by verifying that the mean values for oxidation temperature, oxidation pressure and ammonia-to-air ratio are within the corresponding ranges defined for the AOC. RCE also confirmed that the statistical comparison of allowable and project operating conditions was performed according to the Protocol and that all parameters fall within the 95% confidence interval.

RCE confirmed that $HNO_{3,RP}$ was less than $HNO_{3max,scaled}$ for this campaign. RCE also verified the total operating hours and application in the calculations.

RCE determined that the emission reduction calculations followed the Protocol and found no material misstatements in the final Project GHG reductions calculations and results.

4.0 Verification Results

ClimeCo provided sufficient evidence and documentation of their emission reductions, data collection procedures, monitoring, and quality control procedures. The verification process focused on verifying the historical emissions, baseline emissions, and full campaign project emission reductions and the source data used by ClimeCo to quantify the emission reductions in accordance with the Protocol.

During the verification process, RCE made requests for clarifications and additional documentation requests to complete the verification. The details of RCE's findings are documented in the List of Findings provided to the Reserve, EDNLLC and ClimeCo.

The Project reported emission reductions of 294,643 metric tons of CO_2 equivalents as per the information provided in the calculation summary spreadsheets. During the final review, RCE identified no material misstatements in the data or emission reduction calculations. Table 5 defines the emission reductions verified for this reporting period.

5.0 Conclusion

RCE conducted a risk-based analysis of the El Dorado Nitrogen LP Nitrous Oxide Abatement project GHG assertion including a strategic review of the Project data and evidence. Based upon the processes and procedures and the evidence collected, RCE concludes that the Project emission reductions resulting from the destruction of N_2O during the reporting period April 8, 2022, through October 12, 2022 can be considered:

- In conformance with the Reserve's Nitric Acid Production Project Protocol Version 2.2 and ISO 14064-3:2006 standards,
- Without material discrepancy, and
- Verified to a reasonable level of assurance.

The verified emission reductions are listed in Table 5. While RCE confirmed the emission reduction calculations and the total emission reductions to be correct and within the materiality threshold, the values in Table 5 are summary data only with significant figures rounded for summary purposes in this report. Additionally, the actual campaign start and end dates are reflected but maintenance periods between campaigns are included in the reporting period to ensure contiguous reporting.

Table 5 - Emission Reductions Verified for April 8, 2022 to October 12, 2022

Campaign Start & End Dates	Emission Reductions CO_2e (metric tons)
04/08/2022 – 10/12/2022	**294,643**

Lead Verifier Signature

Phillip Cunningham

Senior Internal Reviewer Signature

Nina Pinette