



GEORGIAN COURT UNIVERSITY

A tradition of excellence...a future of success

**MEMORANDUM OF UNDERSTANDING
BETWEEN THE
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA)
AND GEORGIAN COURT UNIVERSITY**

Purpose

The purpose of this Memorandum of Understanding (MOU) is to document Georgian Court University (GCU)'s commitment to partner with EPA to reduce GCU's carbon footprint. This MOU is intended to be a living document. GCU has signed on as a partner for several voluntary EPA programs that will broaden the University's sustainability initiatives and further incorporate sustainability practices into the GCU culture. For GCU, these programs will always be works in progress as the University recognizes that commitment to each program will require continuous planning and action to effect ongoing improvements.

GCU's efforts for continuous improvement involve: using EPA's environmental stewardship programs to develop policies, practices, and specifications for environmentally efficient standards; increasing stewardship awareness; staying current with EPA regulations and guidelines; increasing involvement and recognition of GCU's stakeholders in environmental sustainability programs. GCU recognizes EPA's program requirements of outreach and involvement, data collecting and reporting, and will strive to become a recognized leader and a candidate for EPA environmental stewardship awards.

For all environmental stewardship programs listed herein, GCU's Director of Sustainability will be the point of contact for program work, and the President of the University will provide the overall leadership. Under this MOU, GCU will participate in the following voluntary EPA environmental stewardship programs and recommendations/guidance:

EnergyStar Building & Plant Partnership
Green Power Partnership
Labs 21 Partnership
WasteWise Partnership
Coal Combustion Products Partnership
National Clean Diesel Campaign & Clean Construction USA
WaterSense Products
GreenScapes Recommendations
Re-Use of Industrial Materials Recommendations

The text that follows briefly describes the voluntary EPA environmental stewardship programs as they apply to GCU. The text also highlights some important sustainability initiatives GCU has already begun, or is currently planning.

1. EnergyStar Building & Plant Partnership and On-Site Renewable Energy

GCU is registered as an EnergyStar Partner. EnergyStar programs assist the University with the protection of the environment by providing cost effective energy efficiency solutions. The program offers proven energy management strategies that help in measuring current energy performance, setting goals and tracking savings. All electrical appliances will meet EnergyStar or equivalent levels and qualify for New Jersey Smart Start rebates. All new buildings will have high efficiency transformers and premium efficient motors. All HVAC systems will be specified with high efficiency as criteria.

GCU has already implemented many specific energy conservation measures based on energy audits of the major buildings and systems on campus

- Domestic water heater temperatures have been reduced in all campus buildings
- Roof retrofits incorporate reflective cooled roofs
- Mechanical equipment needing replacement or upgrade is done using more energy efficient models as the need arises
- Many lighting upgrade and retrofit projects designed to save energy while maintaining or even improving lighting comfort have been undertaken at GCU and we plan to expand this practice in the future. For example, high efficiency fluorescent ballast and bulb replacements have been made campus wide. All fluorescent bulbs campus wide are T-8 or T-5 with a breakdown of 75% T-8 & 25% T-5
- Occupancy sensors have been installed in 235 locations across campus to control lighting when rooms are unused
- We have replaced 493 exist signs / fixtures with LEDs and GCU is researching use of LED lighting in other areas
- Campus wide building temperatures have been adjusted to 68°F during heating season and 78°F during Air Conditioning season to reduce HVAC costs.
- All Dormitories and unused campus buildings are allowed to cool down to a minimum temperature (55°F) during the Winter break.

GCU's Office of Facilities will monitor our mechanical systems and will enact changes or replace equipment as needed in order to increase efficiency.

Using Portfolio Manager, EPA's interactive energy management tool, GCU will track and assess the energy and water consumption of all major buildings on campus. GCU will also determine the energy performance rating of all major buildings on campus. Based on the rating results, GCU will establish energy used reduction goals.

Currently none of the buildings at GCU are sub-metered. However, GCU is looking into the option to sub-meter buildings to track electrical energy consumption. Sub-metering would allow us to identify trends and possible opportunities for energy savings.

The GCU Sustainability Committee, in conjunction with other campus partners, will work to educate students, faculty, and staff about behavioral changes they can make to conserve energy and water resources.

GCU will work with the EPA to develop a comprehensive Environmental Management System (EMS) for the University. GCU's EMS will be a set of processes and practices that enable the University to reduce its environmental impacts and increase its operating efficiency.

GCU will utilize EPA's program offering within EnergyStar Building & Plants entitled "Menu of EnergyStar Offerings for Higher Education" (the Menu) as a structure for continuous improvement and to meet or exceed the goal of at least a 2% reduction in energy use each year under the program.

GCU will work to take advantage of grants through the New Jersey Board of Public Utilities Office of Clean Energy, NJ SmartStart programs, EnergyStar rebates, use of Energy Star labeled appliances and equipment, and additional opportunities.

On-Site Renewable Energy

Via a Power Purchase Agreement with Blue Sky Power, GCU hosts a 385 KW solar array on campus. This array is projected to save GCU \$320,545 versus buying power from traditional sources over 15 year contract. It is also projected to reduce campus CO₂ emissions by 325 tons in the first year of operation and about 4,500 tons over 15 years. We are currently investigating opportunities to further extend the presence and use of alternative energy on campus.

2. Green Power Partnership Program

Under this MOU, GCU will continue to be a partner in the Green Power Partnership Program in which GCU competes against other campuses in the Mid-American conference each year to see which campus is the largest purchaser of green power.

In 2010, GCU was the first higher education institution in New Jersey to purchase all of its electricity from renewable resources via purchase of green, e-certified renewable energy certificates for wind energy equivalent to its annual electrical power usage. This purchase eliminates about 5,247 tons of CO₂ production per year, which is equivalent to the removal of 872 cars from the road, or 540,249 gallons of gasoline or 11,069 barrels of oil or 24.9 railcars worth of coal or the average annual electricity consumption of 630 American homes.

The EPA recently announced that GCU won the 2010-11 College and University Green Power Challenge for our region.

3. EPA GreenScapes Sustainability Recommendations, Green Roof and Integrated Pest Management Techniques

Under this MOU, GCU will utilize EPA's GreenScapes recommendation to reduce the need to replace landscaping materials and high maintenance plants, work towards reusing landscape materials where possible, recycle organic materials and make decisions to specify and purchase products that are environmentally preferable.

As plants need replacement, water hungry, cold-loving, nutrient-demanding plants will be eliminated and species more heat tolerant needing less water and fertilizer will be substituted. Whenever possible, plantings will use genotypes native to the New Jersey Pine Barrens area. When practical, seeds from native plants growing on campus will be collected, germinated in the university greenhouse and the resulting plants will be used when new or replacement plantings are required.

Irrigation systems, when utilized, shall be installed with moisture and rainfall sensors and will operate during optimum watering times, taking into consideration time of day, humidity, temperature, weather and evapotranspiration.

GCU will incorporate EPA's GreenScapes Tip Sheets and Rebuy Checklist into its own campus landscape planning. The GCU GreenScapes Program document will be used for continuous improvement and GCU will continue to be mindful of its waste, energy, fertilizers, pesticides and climate change activities related to its grounds keeping efforts as it engages in Integrated Pest Management (IPM) techniques.

GCU will continue to evaluate and improve its storm water management procedures. The university will incorporate porous pavers into future construction whenever possible. In the summer of 2011 GCU will construct the first of what we hope will be several rain gardens designed to buffer storm water flows into surrounding water bodies and to improve storm water quality. The university also recently purchased its first rain barrel which will be installed in the summer of 2011 and used to test their practicality for irrigation of ornamental plants and young trees on campus. We plan to purchase additional barrels and to install them wherever there is a combination of a need to mitigate the effects of drainage from buildings and a potential use for the stored water for irrigation in the nearby areas.

GCU currently has one retention basin that is used to return surface drainage areas to groundwater and one detention swale to buffer surface flow into Lake Carasaljo. To help improve nutrient processing and ecosystem function, mowing in the area of the detention swale has been stopped and the area is now developing a diverse native wetland plant community. Mowing around the retention basin will be stopped in summer 2011 to allow a natural wetland community to develop, which should also improve water quality of runoff into the basin from the surrounding upland area, keep the water temperature cooler to the benefit of aquatic animals, and reduce the attractiveness of the basin to Canada geese. To help

improve water quality in the retention basin, as well as to help the county to test proposed improvements to storm water basin design, GCU has agreed to partner with Rutgers Cooperative Extension Center to create a series of wetlands using different designs including several variants of the new “granite wetland” design in the area between the Arts and Science parking lot and the retention pond. Storm water from the parking lot will be diverted through these wetlands before entering the pond and water quality and volume will be measured in both inflow and outflows from these wetlands. The data gathered from these wetlands will be used to help inform decisions as to best practice in the design of storm water basins throughout the Barnegat watershed and beyond.

Green Roof

The GCU Wellness building has a green roof on 1760 square feet of the building roof. The green roof captures rainwater and creates a pervious surface, reducing storm water runoff. It also reduces heating and cooling requirements and provides habitat for some forms of invertebrates and other organisms.

Turf Management

GCU is working to improve its turf management practices. The university recently established a number of low / no mow areas as a means of reducing carbon emissions, labor, noise pollution from mowers, and summer air temperatures, and of increasing native plant and animal diversity on our campus. We are also working to reduce the use of weed control chemicals on campus and to reduce fertilizer applications and to increase the use of soil testing as a tool for determining what and how much fertilizer to use in each area. We are using a mulching mower to mulch autumn leaves in some areas to return the nutrients and organic matter to the soil and to reduce the energy needed to rake and remove leaves from the ground.

Groundskeeping

Facilities has purchased a reel mower which will be used to replace motorized vehicles some of the time. The arboretum director has also purchased a reel mower which is being used to mow some areas. When possible, manual landscape techniques (weed pulling versus trimmers, raking versus leaf blowers etc.) will be implemented on campus. To help make this possible, GCU is working to develop a group of volunteers known as the “GCU Green Force” who will provide the labor on a volunteer basis to allow these more time consuming, but more sustainable methods of landscape maintenance to be used, while still achieving the desired aesthetic results.

4. Municipal Solid Waste and Food Waste Recycling and the EPA WasteWise Program

GCU has been a WasteWise Program partner for several years. The university will work to incorporate several of EPA’s programs within WasteWise, including the Resource Conservation Challenge to manage materials more efficiently; WARM (an Excel spreadsheet) to estimate greenhouse gas reductions from its recycling practices; Electronics Challenge to recycle and avoid hazardous materials from entering landfills; Building Challenge to recycle, reuse and reduce construction and demolition materials; and Comprehensive Procurement Guidelines to

specify and purchase standard materials containing recycled content. The actual amount of recycling/re-use of materials listed below will be reported to EPA in our Green MOU updates.

EPA commits to provide GCU with WasteWise Partnership news and product information, provide support to GCU requests for information on WasteWise Partnership and provide materials to assist GCU in outreach and education. GCU will work to reduce its solid waste stream. Further, GCU will enhance current source separation and material recycling for which a new or emerging market exists, including but not limited to: paper, cardboard, news print, metal, glass, plastic containers and electronics.

Food Waste Recycling and On-Site Composting of Yard Waste

Under this MOU, GCU will investigate and implement food waste composting and report the amounts of food waste diverted from landfill as a result of these efforts to EPA, along with the other solid waste recycling information.

GCU will endeavor to eliminate food scraps from its waste stream. The university has already gone trayless in order to reduce the amount of food waste generated in its dining facilities and the amount of water and heat energy used to wash and dry trays and dishes. These measures have resulted in a 6% decrease in waste per meal served from 6.7 oz / meal in 2010 to 6.3 oz / meal in 2011.

GCU is looking into the possibility of developing a composting program the remaining food waste stream in order to remove this from the university's contribution to local landfills. The university is also working with its dining service provider to replace the disposable plastic serviceware currently being used at the Court Café with compostable serviceware, which will further reduce the amount of waste generated on campus. The university is also working to promote use of reusable water bottles in order to reduce the waste created by plastic beverage bottles. GCU is installing filters on some water fountains within highly trafficked buildings to provide easy access to water to fill such bottles. GCU is also working on a variety of educational campaigns to help raise awareness of this issue.

Mixed Fiber (Paper) and Bottles/Cans Recycling

Georgian Court University's recycling stream is collected by the municipality (Lakewood, NJ) and is co-mingled. Recycling activity continues to be successful, with tonnage increasing yearly.

All Georgian Court University's facilities are part of its recycling program. The program provides collection containers that are placed adjacent to trash receptacles. The containers are easy to access by housekeeping personnel when collecting recyclable items. Any hazardous waste generated within the campus is appropriately contained and provisions are made for their proper disposal.

Recyclemania Competition

In an effort to educate the campus community about solid waste management and to reduce the solid waste produced on campus GCU has participated in Recyclemania since 2007. After a strong start, our rankings within the program have slipped in recent years. To try to reverse this trend, we plan to expand the program and engage the student population to a greater extent. We plan to hold competitions between dorms to raise both awareness and overall recycling rates. We also plan to engage several students in developing and implementing awareness-building campaigns as part of their service learning requirement for graduation.

GCU's recycling rate currently hovers at around 0.8 Lbs / person / week with a short term goal of 2 Lbs/ person / week.

Electronics Waste (E-Waste) Recycling.

Computer components/CRTs contain hazardous substances, which can harm the environment if they are simply put out with the trash. These items and similar ones contain cadmium, lead, and mercury, which can make their way into landfills or incinerators, and require substantial cost and effort to assure that these hazardous substances are not released into the air or water.

GCU collects all E-Waste generated on campus for proper disposal through a local company.

Toner and Ink Recycling

GCU has an ongoing toner cartridge recycling program. Collection receptacles for used toner cartridges are available in numerous locations on campus. The cartridges so collected are picked up periodically and are used for refill and resale.

Proper management of Hazardous and Universal Waste

GCU currently uses ChemSW for our chemical inventory system. However, our safety office is currently working with our IT department to develop an internally designed database to manage our chemical inventory, since the cost to upgrade the software is very high.

5. Re-Use of Industrial Materials

GCU will look to incorporate the re-use of industrial materials, where appropriate, in future construction projects, and will consider joining EPA's Coal Combustion Products Partnership (C2P2). -Any re-use of industrial materials will be reported under this MOU.

6. Labs 21 Partnership

The goal of the Labs21 Partnership Program is to encourage the development of sustainable, high performance, and low-energy laboratories nationwide. Under this MOU, GCU commits to study current laboratory, art and photo studio design conditions, study the codes, and consult with GCU's Environmental Health and Safety officer to identify programmatic constraints or issues that cause high energy usage. To guide its response to any identified areas of concern, GCU staff will consult EPA's recognized Center of Excellence case studies ("Institutions of Labs

for the 21st Century”), EPA’s video “Labs 21 Approach”, and EPA’s Tool Kit (“Resources for High Efficient Design, Operations and Lab Maintenance”).

7. National Clean Diesel Campaign & Clean Construction USA

Transportation and Commuter Program

Under this MOU, GCU will consider utilizing the various clean diesel strategies and practices outlined by EPA’s Clean Construction USA program which cooperatively promote and implement measures to effectively reduce emissions from vehicles and other internal combustion engines used in construction and operation of its facilities.

Clean Construction Practices

For future construction projects, GCU will refer to the Clean Construction USA program and guidelines described in the booklet “Low-Cost Ways to Cleaner Construction” and strive to incorporate the Northeast Diesel Collaborative Model Contract Specification for Diesel Emission Reduction Controls in Construction Projects, which requires the use of clean construction equipment and clean fuel use, in its specifications for contractors. EPA commits to provide GCU with Clean Construction USA program news and product information, provide support to GCU requests for information and materials to assist GCU in outreach and education. Whenever possible, GCU is committed to utilizing construction materials with recycled material content, materials manufactured locally, within a 500 mile radius, and materials with low volatile organic compound (VOC) off-gassing. In addition, GCU will engage construction and demolition debris haulers/ recyclers to recycle waste that is generated from new construction and renovation projects. Amounts of materials reused or recycled under this initiative will be tracked and reported when relevant.

Enhanced Idling Reduction

Enhanced idling reduction measures reduce fuel consumption and pollution by setting a 3 minute idling time limit and actively encouraging that this limit be followed. GCU will implement idling reduction measures in its own fleet and encourage all contractors, employees and visitors to do the same.

Campus Operations Vehicles

Clean vehicle programs reduce fuel consumption and improve air quality by taking advantage of the latest technologies available to improve fuel economy and reduce emissions from on-road vehicles. Clean vehicle fleet measures include purchase of cleaner (hybrid or alternatively fueled) light-duty vehicles, and use of ultra-low sulfur diesel fuel and best available retrofit technologies on diesel fuel-powered on-road vehicles.

In its fleet of 21 vehicles, GCU currently has only 1 hybrid vehicle. However, we do have nine electrically powered golf carts. GCU recently removed two older vehicles from our fleet and replaced them with electric club cars. GCU is currently exploring the purchase of several

hybrid/electric cars for the Campus Security Department, which will also replace less fuel-efficient vehicles. Whenever replacing gas-powered vehicles, GCU will consider purchasing the most fuel-efficient vehicles possible. GCU will also work to promote the use of clean vehicles by its contractors, faculty, staff and students.

Benefits for “Clean’ Commuters

GCU will look into giving its faculty, staff, and students preferred parking or other incentives for using hybrid or alternatively fueled vehicles, and those participating in carpools. GCU will also work to promote use of carpooling and public transportation, where practical, among all members of the university community.

GCU is committed to designing all new construction and major renovation projects to meet at least LEED Silver specifications.

Historic preservation is a key element in the practice of sustainable development and environmental responsibility. Long before the term became trendy, the Sisters of Mercy modeled the concept of “adaptive reuse” when they purchased the estate of George Jay Gould to expand their college. The “greenest” buildings are those that are already standing. Georgian Court is thus committed to combining adaptive reuse of its existing buildings with improvements in insulation and other mechanisms to improve the energy and resource efficiency of these older facilities.

Environmentally Preferable (“Green”) Products

GCU is committed to green cleaning in all of its facilities. The university will complete an in depth study of cleaning and floor care products and will move to ensure use of renewable, sustainable bio-based products. The university will use Green Seal Certified products wherever a Green Seal product is available. Further, in the future environmental sustainability will be a key criterion in the selection of all new cleaning supplies, including such items as mop heads, glass and all-purpose cleaners, floor stripper/wax. The university intends to consult the EPA’s Environmentally Preferable Products list to guide this process.

Currently, paper hand towels and toilet paper are made with recycled material content. GCU will also investigate use recycled paper in printers and offices and to the purchase of refillable / reused toner and other similar products wherever possible.

8. WaterSense Products

Both GCU and EPA recognize the importance of using water efficiently. Water-efficient behaviors and the use of quality products that minimize water use can result in: less water drawn from local aquifers and surface waters; potential improvements to the water quality of the Barnegat Bay watershed; reduced energy use and CO2 emissions related to water treatment and pumping; reduced wastewater treatment; and reduced water utility costs.

Under this MOU, GCU will utilize WaterSense Products when appropriate. GCU also commits to following the WaterSense Guidelines to encourage students, faculty, staff and administrators to conserve water.

EPA commits to provide GCU with WaterSense program news and product information, provide support to GCU requests for information and best practices on WaterSense, and provide materials to assist GCU in outreach and education.

Campus and Community Involvement

Among the Critical Concerns of the Sisters of Mercy of the Americas is reverence and care for Earth, impelling them to work toward sustainability and actively support the recent United Nations declaration that water is a fundamental right for all life.

The Sisters of Mercy's Environmental Guidelines challenge us to "strive in our daily lives to approach everything we do with an awareness of God's gift to us - our co-creative role and our interrelatedness to all Earth life." The Sisters of Mercy believe that all creation is sacred and that human beings have a special responsibility to consciously partner with Earth's diverse creatures and biological systems.

Animated by the Gospel and the charisma of their foundress, Catherine McAuley, the Sisters of Mercy are committed to being in solidarity with those who are economically poor, especially women and children.-

The university recently appointed a director of sustainability who is charged with promoting sustainability in all areas of campus life. GCU also has formed a sustainability committee to help mentor and implement sustainability-related activities within the university. The University sponsors a Living Learning Community whose goal is to integrate classroom learning about sustainability-related issues with real life experience. Starting in the fall of 2011, GCU will be offering a minor in sustainability to help enrich our students' education while preparing them to create a more healthier, just, and sustainable world in whatever profession they follow upon graduation. The university is also working to integrate sustainability as a core learning objective in courses across the curriculum.

GCU is working to develop a sustainability website, both to share news about our activities and achievements in this area and to provide information on how to live more sustainably to our alumni and the larger community.

The director of sustainability is currently writing grants to fund creation of the position of Sustainability Outreach Coordinator to allow us to increase our ability to provide information about and support of sustainability activities within our community.

MOU Status Reporting

In addition to the reporting items associated with EPA Partnership Programs, GCU will submit an MOU status report to EPA annually beginning September 1, 2012. The report will include an update and specific data on the various activities identified in this MOU.

EPA will use this data to determine the environmental benefits associated with GCU's "green" activities and will communicate its findings to GCU in a prompt manner.

Terms and Conditions

This MOU is not a contractual or a financial obligation instrument. Nothing in this MOU shall obligate EPA or GCU to expend appropriations or to enter into any contract or other obligations or be cited as the basis for the promise or transfer of funds. Collaboration under this MOU shall be in accordance with applicable statutes and regulations.

This MOU does not restrict EPA or GCU from participating in similar activities or arrangements with other entities or Federal agencies (domestic or foreign).

Either party may unilaterally withdraw at any time from this MOU by issuing a signed written notice to that effect to the other party. By mutual agreement, which may be either formal or informal, the parties may modify the list of intended activities set forth in Paragraph III, above, and/or determine the practical manner by which the goals, purposes and activities of this MOU will be accomplished. Modification to other written parts of this MOU must be made in writing and signed by both parties, or their designees.

Nothing in this MOU shall be construed to authorize or permit any violation of any Federal, State or local law, including, but not limited to, any environmental law administered and/or enforced by EPA.

Access to all documents generated pursuant to the activities set forth in this MOU that constitute agency records for purposes of the Freedom of Information Act ("FOIA"), 5 U.C.S. 552 shall be governed by the provisions of the FOIA.

GCU agrees that it does not expect, nor will they ever seek to compel from EPA in any judicial forum, the payment of money, services or other thing of value based upon the terms of this MOU. The foregoing provision does not in any way affect any legal rights accruing to GCU by virtue of any other law, contract and/or assistance agreement.

GCU understands and acknowledges that, as an institution of the Federal Government, EPA has a duty to refrain from providing any commercial entity an exclusive privilege without receiving payment therefore and, as a consequence, that EPA's relationship with GCU in no way affects, alters or otherwise constrains EPA's right to provide similar (or identical) services to, or establish similar (or identical) relationships with, any other entity.

GCU understands that EPA's participation in this MOU does not constitute an endorsement, express or implied, of (a) any policy advocated by GCU or (b) any goods or services purchased, offered or sold by GCU, or (c) any product or products solely by virtue of carrying the WaterSense or EnergyStar label. GCU agrees not to make statements to the public at workshops or meetings, in promotional literature, on its Web site, or through any other media that imply that EPA endorses GCU or any service or product offered by GCU. GCU is free to publicize the existence of this MOU.

The parties agree that any copyrightable subject matter, including but not limited to journal articles, training, educational or informational material or software, created jointly by the parties from the activities conducted under the MOU may be copyrighted by GCU. GCU hereby grants to EPA a royalty-free, nonexclusive, irrevocable right to reproduce, distribute, make derivative works, and publish the work(s) publicly, or to authorize others to do the same on its behalf.

The EPA enters into this MOU under the authority of Section 103 of the Clean Air Act, 42 U.S.C. §7403, Section 104 of the Clean Water Act, 33 U.S.C. §1254, and Section 8001 of the Solid Waste Disposal Act, 42 U.S.C. §6981, Section 6604 of the Pollution Prevention Act, and Section 324A of the Energy Policy and Conservation Act, which provide EPA with authority to undertake cooperative efforts with other organizations to promote the coordination and acceleration of research, studies, training, and other efforts to prevent, reduce and eliminate pollution.

This MOU does not create any right or benefit, substantive or procedural, enforceable by law or equity against GCU or EPA, their officers or employees, or any other person. This MOU does not direct or apply to any person outside of EPA and GCU.

Effective Date and Administration

This MOU will become effective upon signature by the Regional Administrator of EPA Region 2 and President of GCU. It may be modified or amended by written agreement signed by both parties. Unless otherwise terminated by one of the parties this MOU will terminate at the end of five (5) years from the date of signature unless revised or extended at that time by written agreement of the parties. This MOU may be terminated at any time by either party upon the issuance of a written notice to the other party. The Parties will annually review the provisions of this MOU and its implementation.

Signed:

Judith A. Enck
Regional Administrator
U.S. EPA Region 2

Rosemary E. Jeffries, Ph.D. RSM
President
Georgian Court University