

STATE OF VERMONT
PUBLIC SERVICE BOARD

Petition of Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc., for a certificate of public good, pursuant to 30 V.S.A. § 248 and 10 V.S.A. § 6522, authorizing the construction of a second independent spent fuel storage installation storage pad and related improvements, including installation of a new diesel generator with an electrical rating of approximately 200 kW, at the Vermont Yankee Nuclear Power Station in the Town of Vernon, Vermont

May 2, 2016

Docket 8300

NEW ENGLAND COALITION'S REPLY TO ENTERGY VY'S OPPOSITION TO
NEW ENGLAND COALITION'S MOTION FOR
JUDICIAL NOTICE OF TWO NEWLY PUBLISHED DOCUMENTS

I. INTRODUCTION

New England Coalition ("NEC") by and through its undersigned *pro se* representatives, herein replies to Entergy VY's ("ENVY") Opposition to NEC's April 14, 2016 request that the Vermont Public Service Board to take judicial notice of two newspaper articles that are relevant the above-caption proceeding and which illuminate facts vitally material to a decision. Both articles were published after reply briefs were filed in this matter.

As amply demonstrated in the following discussion, ENVY's attorneys have in this Opposition shirked their duty to candor¹ before this tribunal and instead compounded misdirection with an

¹ VRCP Rule 3.3.(a) (3) CANDOR TOWARD THE TRIBUNAL (a) A lawyer shall not knowingly...(3) offer evidence that the lawyer knows to be false. If a lawyer, the lawyer's client, or a witness called by the lawyer has offered material evidence and the lawyer comes to know of its falsity, the lawyer shall take reasonable remedial

attempt to deceive in their furtherance of false testimony. ENVY's memorandum in opposition to NEC's Motion for Judicial Notice of Two Newly Published Documents having no basis in fact or law is both facetious and fallacious and the Board must reject it in its entirety. NEC's Motion for Judicial Notice of Two Newly Published Documents is well-founded in both fact and law. NEC has verified the content of the two newspaper articles by readily accessible information from authoritative and irrefutable sources. NEC's Motion must be granted.

II. BACKGROUND

The Board Held a Technical Hearing in this docket on February 23, 2016. A transcript of the Hearing was published on February 25, 2016. On March 10, 2016, NEC, having reviewed the transcript and having ascertained false testimony, filed a Motion to Admit New Evidence together with four attachments "evidence" for which NEC requested admission. Briefs and Reply Briefs were completed by March 28, 2016. On April 14, 2016, NEC filed its Motion for Judicial Notice of Two Newly Published Documents, which is the subject of ENVY's opposition and this, NEC's Reply.

IV. DISCUSSION

A. ENVY FALSELY CLAIMS THAT THE KEENE SETINEL PHOTOGRAPH DOES NOT CONTRADICT RECORD TESTIMONY THAT THE CASKS WOULD ONLY BE VISIBLE FROM OR ACROSS THE CONNECTICUT RIVER.

NEC asks the Board to take judicial notice of a newspaper article that contains a photograph of the Vermont Yankee Nuclear Power Station ("VY Station"). ENVY says that NEC's claim is that the photograph demonstrates the "false testimony" of Entergy VY witness Dodson "that the ISFSI was visible only from across the Connecticut River." [Emphasis added] ENVY says it does not.

In its Opposition ENVY appears to say that witness Dodson did not say that the ISFSI was visible from across the river; ENVY then employs the beginner magician's ploy of misdirection by attempting to focus the reader's attention on preceding and succeeding material so as to miss

measures, including, if necessary, disclosure to the tribunal

the key statement which is "hidden" in plain sight.

In the following replication of ENVY's selected quote, NEC has underlined and cast in bold the key sentence. ENVY writes: "Here is Mr. Dodson's actual testimony that NEC claims the newspaper photograph shows to be false."

BY MR. SHADIS:

Q With the other buildings gone are the casks visible from the fence line anywhere on site?

A Which fence line?

Q Well the property fence line. There's a property line, fence line, that runs between the site proper and the adjoining properties. What we usually refer to as fence line,

A: It would not be visible from the fence line.

Q: Nowhere?

A: Nowhere. The only location where it would be visible from would be the Connecticut River and the hiking trail along the New Hampshire shore.

Tr. 2/23/16 at 50:13-25 (Dodson).

This last answer is false and contradicted by the Sentinel photograph (now kindly identified and verified by ENVY in its Objection (see below).

ENVY complains that Mr. Dodson thus testified that the casks on the proposed second ISFSI will be visible both from the Connecticut River as well as from across the river, not as NEC misleadingly asserts — "only from across the Connecticut River." NEC takes ENVY's point, but it is a distinction without a difference. NEC's "characterization" is correct and does not depend on the precise quote or omitted quote of one word. Mr. Dodson took all of his photos from the Hinsdale shoreline and does not think that the view from the river itself would be any different.

Trans.P.49 Lines 15-20 CHAIRMAN VOLZ: Mr. Dodson, just for clarification so this exhibit EN-HLD 21 is a view from the New Hampshire side of the Connecticut River; is that correct? MR. DODSON: Yes. [as are all of the "view shed" exhibits] From the hiking trail on the New Hampshire side.

Trans. P.70 Line 2-92 Q. Why didn't you include photographs from the perspective of people enjoying the river as opposed to a mile away on the far shore? A. I think the view that you get from the far shore that we took is representative also of the views that you would get from the river. It's much less than a mile distance between where we took the photos and in the station.

Through Mr. Dodson's testimony the river is paired with reference to the New Hampshire shore. This is important because Mr. Dodson's entire aesthetics testimony hinges on the appearance of the casks as viewable only from a long distance ("the far shore") and, physics be damned, "representative of views that you would get from the river."

Trans. Pages 54, 55 Lines 13-25 and Line1, Q. Okay. Could you please rank for us what aspects of the casks, what aspects of the casks the image they present are best, worst aesthetically? Could you explain that? Q. Yeah. What's -- what's good looking about these casks? What's bad looking about them? A. I think the most apparent quality of the cask is that they are minimally visible from the Connecticut River and the New Hampshire shoreline. They are relatively small in relation to their surroundings. They fit in with the industrial character of their surroundings. They are of a color that blends in with the existing surroundings. That would be the positive aspects. The negative aspects would be that they are a new element in the scene albeit a very small one. [Emphasis added]

ENVY proceeds to misdirect further,

Even setting aside NEC's mischaracterization of Mr. Dodson's testimony, the photograph (Attachment A to NEC's Motion) does not in any way contradict Mr. Dodson's testimony. As NEC's examiner made clear, his questioning was directed to the visibility of the casks from the "property line, fence line, that runs between the site proper and the adjoining properties."

It is not NEC's questions that are at issue (left hand), but rather it is Mr. Dodson's answers, which go beyond simple direct answers to be sweeping objective and conclusive, albeit false, declarations, not just addressed to NEC but also to the Board.

Trans. Page 51 Lines 10-19 CHAIRMAN VOLZ: What causes them to not be visible? Is there an obstruction between the fence line and the pad? MR. DODSON: I'm assuming the fence line is mainly the line that exists on the western portions of this site as opposed to along the river. CHAIRMAN VOLZ: Right. MR. DODSON: The facility won't be visible from any of the areas in the western portion of this site

Here, Mr. Dodson's identification of "fence line" is "mainly the line the exists on western portions of the site as "opposed to along the river." [Emphasis added] The reader will please note that is, "on western portions of the site" and not between VY and other property.

ENVY next discusses the photograph providing thereby providing authentication of the photograph and its subject matter.

In the newspaper photograph, the proximity of the 345 kV Switchyard (not the VELCO substation) in the photograph's foreground (from which the North Warehouse's roof is visible) shows that the picture was taken at a security fence (roughly in the spot in the Main Parking Lot marked with the [blank, sic] on the exhibit), hundreds of yards inside the VY Station's "property line . . . that runs between the site proper and the adjoining properties."

ENVY at once argues that specifics of the mechanics of taking the photograph are unknowable and then expounds in detail about the angle and location from which the photograph was taken. ENVY provides no supporting evidence for the details in its claims. If, arguendo, ENVY's claim that the photo was shot from the vicinity of [and not inconsequentially through] the 345kV switchyard. It should be remembered that the 345kV switchyard was sold and the underlying real estate leased on a one-time payment to TRANSCO, LLC. in 2008. *VPSB Docket 7481, Order Entered December 18, 2008*. Thus, the photograph which clearly shows that it was taken through three lines of fence was evidently taken through TRANSCO property and over leased land, presumably with all usage rights attached.

Further, the photograph appears to have been taken from land contiguous with and not demarked from land designated by ENVY in Docket 7530 as "public access" land.

Exhibit EN-12 Visual Analysis Proposed Vermont Yankee ...
psb.vermont.gov/.../7530 Vt Yankee Fence line Expansion

1.

Apr 13, 2009

Exhibit EN-12 April 13, 2009 Visual Analysis Proposed Vermont Yankee
Perimeter Fence Harry L. Dodson Dodson Associates, Ltd.

1-5. What is the project's impact on open space in the area? The proposed fence will have limited impacts on open space in the area. It will not reduce the amount of existing open space nor will it change the use of the space. The fence will function as a typical agricultural fence separating wooded areas from fields. In the few locations where it traverses the field, agricultural use will continue on both sides of the fence with access for tractors provided by a gate. Currently private property, public access to open space will not be affected by this state-mandated fence. Visual access to the site by the public from Governor Hunt Road will not be impaired by the fence.

NEC does not agree with the conclusions the ENVY draws from this exercise.

This photograph shows that the ISFSI will be visible from a relative close public vantage points to North and West of the plant and not merely at distance from the East, contradicting Mr. Dodson's statement that "The only location where it would be visible from would be the Connecticut River and the hiking trail along the New Hampshire" Trans. Page 51 Lines 10-19 (Dodson).

The *Keene Sentinel* photograph is relevant, either to support a finding of fact relevant to the aesthetics standard established by the *Quechee* test or to impeach Mr. Dodson's testimony that the *Quechee* test is satisfied.¹ It is important to note that Mr. Dodson's entire aesthetics analysis rests on the false assumption that the ISFSI cannot be seen from locations to the North and West of the site.² If that is false, and it is becoming increasingly evident that it is, the Board cannot legitimately make positive findings with respect to aesthetics and probably not potential site reuse or local planning either. Absent legitimate findings in these areas the Board cannot order issuance of a Certificate of Public Good. Accordingly the Board should take

² Prefiled Testimony of Harry L. DodsonPSB Docket No.8300, June 30, 2014Page 11 of 27

Q11. Based on your viewshed analysis, will the Project be visible from the surrounding area? A11. The Second ISFSI storage pad and casks will be visible at a distance of up to a mile to the northeast as a minor visual element within a much larger existing industrial complex in Scenario 1. I refer to the area from which the Project will be visible to as the viewshed. It consists of limited sections of the open water of the Connecticut River and portions of the banks of the river in Hinsdale, NH. Some portions of the bluff along the river in Hinsdale will have partial, screened views of the Second ISFSI storage pad and casks in the wintertime. The bluff is steep, forested and approximately 40 to 60 feet in height. Wooded hills in Hinsdale approximately two to three miles distant will not have significant views of the Project due to their distance from the site, the relatively small size of the Project and the fact that the hills are covered by dense forest. Some very distant screened views of the Project may be available from steep, deciduous woodland slopes in these hills in the winter, but the Project would hardly be perceptible from this distance. For almost all viewers, the proposed Project will be a background view. Q11. Based on your viewshed analysis, will the Project be visible from the surrounding area? A11. The Second ISFSI storage pad and casks will be visible at a distance of up to a mile to the northeast as a minor visual element within a much larger existing industrial complex in Scenario 1. I refer to the area from which the Project will be visible to as the viewshed. It consists of limited sections of the open water of the Connecticut River and portions of the banks of the river in Hinsdale, NH. Some portions of the bluff along the river in Hinsdale will have partial, screened views of the Second ISFSI storage pad and casks in the wintertime. The bluff is steep, forested and approximately 40 to 60 feet in height. Wooded hills in Hinsdale approximately two to three miles distant will not have significant views of the Project due to their distance from the site, the relatively small size of the Project and the fact that the hills are covered by dense forest. Some very distant screened views of the Project may be available from steep, deciduous woodland slopes in these hills in the winter, but the Project would hardly be perceptible from this distance. For almost all viewers, the proposed Project will be a background view.

judicial notice of the photograph.

The Board may readily confirm the evidentiary worth of this photo by a site visit, the site visit of an authorized designee, or by requiring ENVY to produce a continuous and overlapping (panoramic) photo series from north and west locations on abutting or public access land.

For what it is worth and by way of confirming the information in the Keene Sentinel photograph, on April 26, 2016 NEC dispatched a staff person to Vernon for the purpose of taking a photo of the future ISFSI location from beyond the visual barrier described in Mr. Dodson's testimony.

Trans. Pages 51, 52 Lines 17-25 and Line 1

MR. DODSON: The facility won't be visible from any of the areas in the western portion of this site. BOARD MEMBER HOFMANN: Is that true whether it's summer or when there's foliage and when there's not foliage? MR. DODSON: Yes because it's mainly evergreen screening and also you have an approximately 20-foot drop in elevation which screens out views from the west side of the site.

On the staff person's return NEC examined his camera to find a image showing the ISFSI site, including the North Warehouse, and the foliage barrier described by Mr. Dodson. Contrary to his testimony, this portion provided little screening effect and was for the most part leafless in accord with its apparent seasonal deciduous character. The Photograph is Attached as, NEC
REPLY EXHIBIT ONE.

The contents and character of this photo are once again easily confirmed by a site visit or by a similar photo required of ENVY.

B. ENVY DISENGENUOUSLY CLAIMS THAT THE VY STATION'S SITE-SPECIFIC PLAN CONTROLS THE MITIGATION MEASURES THAT MAY BE IMPLEMENTED AT THE STATION.

ENVY attempts to confuse NRC requirements with NRC approved options. If ENVY wanted to defoliate Windham County with Agent Orange as a security measure, it is fairly certain that NRC would approve its plan to do so, but NRC does not require the use of Agent

Orange. Not yet.

The Department of Public Service before turning to the statements of ENVY witnesses, NEC must say that the DPS apparent understand the testimony as NEC did and did not confuse options with requirements

DPS Brief ,proposed fact 34.

Screening measures around the Project are not possible at the VY Station in order to preserve line of visibility security requirements pursuant to NRC regulations. Dodson pf. 23; Tr.22-23 (Thomas).

Dodson Pfld Page 23 Lines 10-13 Q23. Do you propose any additional mitigation measures for this Project? A23. I understand that many mitigating measures such as planting, creation of berms and screening are impossible or very restricted by security requirements.

Trans. Pages 22,23 Lines 12-25 and 1-4 (Thomas) Based on your familiarity with the security requirements can you explain what the basis of Mr.Dodson's understanding is? A. We have, at Vermont Yankee, had to remove trees and other impediments to the security force's ability to have a good line of visibility for a potential threat, I'll use that term generally, in the past, and the basis of his statement is what is the basis of the existing Vermont Yankee security plan. Q. Which is? A. Which is that certain -- well, first of all, the security plan safeguards information, but it restricts the -- restricts the placing of obstacles that prevent the security forces from having a good line of sight around the protected area. Q. And that security plan is it guided by NRC regulations? A. Yes it is, and CFR 73.

ENVY doubles-down on the false premise that somehow, perhaps through some sort of little-known regulatory back feed, NRC regulates against berms and foliage plants to protect line-of-sight visibility out to unknown distances. ENVY invokes 10 C.F.R. § 73.51(d) claiming it requires that licensees must implement a physical protection system that uses "methods acceptable to NRC". What ENVY does not say is that those "methods" are specified set out in detail, and itemized following section (d).

10 C.F.R. § 73.51 (d) *Physical protection systems, components, and procedures.* A licensee shall comply with the following provisions as methods acceptable to NRC for meeting the performance capabilities of § 73.51(b)(2). The Commission may, on a specific basis and upon request or on its own initiative, authorize other alternative measures for the protection of spent fuel and high-level radioactive waste subject to the requirements of this section if after evaluation of the specific

alternative measures, it finds reasonable assurance of compliance with the performance capabilities of paragraph (b)(2) of this section.

The only paragraphs that apply to visibility or intruder detections requirements are these three:

(1) Spent nuclear fuel and high level radioactive waste must be stored only within a protected area so that access to this material requires passage through or penetration of two physical barriers, one barrier at the perimeter of the protected area and one barrier offering substantial penetration resistance. The physical barrier at the perimeter of the protected area must be as defined in § 73.2 Isolation zones, typically 20 feet wide each, on both sides of this barrier, must be provided to facilitate assessment. The barrier offering substantial resistance to penetration may be provided by approved storage cask or building walls such as those of a reactor or fuel storage building.

(2) Illumination must be sufficient to permit adequate assessment of unauthorized penetrations of or activities within the protected area.

(3) The perimeter of the protected area must be subject to continual surveillance and be protected by active intrusion alarm system which is capable of detecting penetrations through the isolation zone and that is monitored in a continually staffed primary alarm station and in one additional continually staffed location. The primary alarm station must be located within the protected area; have bullet-resisting walls, doors, ceiling and floor; and the interior of the station must not be visible from outside the protected area. A timely means for assessment of alarms must also be provided. Regarding alarm monitoring the redundant location need only provide a summary indication that an alarm has been generated.

None of the sub-paragraphs restrict aesthetic mitigation measures except within a twenty-foot isolation zone, one wall of which may be the cask exterior wall itself. Alternative measures may be authorized, but only on a Commission finding that alternatives will meet all of the objectives listed in these many paragraphs (sub-parts). Upon diligent search, no such findings in the case of Vermont Yankee are listed in NRC's Agency-wide Documents Accession Management System (ADAMS). Based on NEC is led to the conclusion that ENVY's demur on mitigation security "requirements" is a complete fabrication. ENVY justification, that a regulated licensee generated document carries the force of regulation is in this case wishful thinking. NEC will further point out that ENVY has referenced no specific language in the site plan. Surely, if isolation zone specifics can be published on the web, planting or not planting trees, terraforming and berming or

not berming cannot be categorized "safeguards" information. ENVY's arguments, backed once again by highly selective and edited citations, are clearly spurious and must be rejected.

NEC also asks the Board to take judicial notice of a newspaper article that includes a photographic aerial view of Maine Yankee's ISFSI, claiming the photograph shows "mitigating measures such as berming and foliage plantings" that could be applied to the proposed ISFSI. ENVY says, "Measures taken at Maine Yankee, however, are not pertinent to the decision this Board must make about the proposed VY Station ISFSI: A plant's security plan must be tailored to the particular features of its site and is necessarily site-specific. *see also* Entergy VY's Proposal for Decision and Brief at 47-49.

And ENVY says, As Mr. Thomas testified, the VY Station security plan "restricts the placing of obstacles that prevent the security forces from having a good line of sight around the protected area." Tr. 2/23/16 at 22:15-23:4 (Thomas); *see also* Dodson pf. at 23:13-24:2. \

By choice perhaps, though the exact language from the plan has not been cited. However, as shown above any such choice is not by force of regulation and so if it really is part of ENVY's security plan it could be undone as easily as drafted. Given the generic nature of NRC security requirements, the newspaper photograph of Maine Yankee has relevance to the VY Station and can support a finding of fact on mitigation, and the Board should take judicial notice of the photograph. Both the photographs and the two news articles are susceptible to ready and authoritative verification. NEC, in order to demonstrate the verifiable nature of the Wiscasset Newspaper article and the accompanying Maine Yankee Atomic Power Company photograph searched for and promptly found a Yankee's webpage (homepage) featuring three photographs of each of three nuclear power station ISFSIs, including Yankee Rowe, Connecticut Yankee, and Maine Yankee. All three sites feature visibility screening foliage. Accompanying the

photographs is text which includes the following statement, "The spent nuclear fuel and GTCC waste is stored and secured in accordance with Nuclear Regulatory Commission (NRC) licensing requirements at each sites Independent Spent Fuel Storage Installation (ISFSI)" Thus not just Maine Yankee, but all three shuttered New England plants (excepting VY) have ISFSI's screened by foliage while remaining compliant with NRC regulation.

Further, to test the assertions in the Wiscasset Newspaper article that Department of Energy ("DOE") progress on interim consolidated waste storage was slow, NEC went to the Federal Register where NEC found DOE notice of public meetings through mid-2016 on building community consensus for waste storage with an objective of a year-end report, much as relayed in the Wiscasset Newspaper. Reference to the Congressional Record found that the enabling legislation for interim nuclear waste storage had been sent to committee in 2012 and has shown no signs of emerging for action in either chamber. NEC has attached the NEC staff photo with supporting affidavit as NEC Reply Exhibit One, 3Yankee's webpage printout as NEC Reply Exhibit Two, the Federal Register notice regarding DOE Meetings as NEC Reply Exhibit Three, , and the Congressional Record Report on the interim nuclear waste legislation as NEC Reply Exhibit Four in support of the two newspaper articles that were filed with NEC's Motion to Take Judicial Notice.

1, The Board has authority to relax the Rules of Evidence

Pursuant to 3 V.S.A. § 810(1), the Board is required to follow the Vermont Rules of Evidence as applied by the superior courts of Vermont in civil cases. However, this statutory obligation is tempered by the Board's authority to relax the rules of evidence pursuant to Section 810(1), which states in relevant part: When necessary to ascertain facts not reasonably susceptible of proof under those rules, evidence not admissible there under may be admitted... if it is of a type commonly relied upon by reasonably prudent men in the conduct of their affairs.[4] The discretion that the Legislature has afforded the Board in crafting its evidentiary record reflects a recognition of "the need of agencies to consider any evidence which may illuminate the case." [5] This need arises from the very nature of the Board's determinations, which "necessarily are made in the context of proceedings that are legislative or policy-making in nature." [6] As a quasi-

judicial administrative tribunal, the Board is the trier-of-fact charged with applying its experience, technical competence, and specialized knowledge to evaluate the evidence presented in a given case...

Amended Petition of Entergy Nuclear Vermont Yankee, LLC, 020813 VTPSBD, 7862
Investigation Into: (1) Petition of AARP, 050510 VTPSBD, 7535

However, knowing that newspaper articles seldom get past the hearsay rule, NEC would not take it amiss if the Board decided on its own to notice the supporting material (official documents, readily confirmable photo image, included) and commercial publication.

2. There is precedent for Board action on false testimony, misleading testimony, and/or the provision of inaccurate information as it did in Docket 7440 when ENVY provided inaccurate information much less damaging to the review process underway than the false testimony of ENVY witnesses Dodson and Thomas.

VPSB DOCKET 7440 - PROCEDURAL ORDER entered: 1/29/2010

The provision of timely, accurate and complete information is essential to our decision in this proceeding and to the cases presented by the other parties (and, as well, to the legislature's own, parallel determination). Therefore, at the status conference we stated that: As this case proceeds, we will require Entergy to provide prompt and complete corrections to any inaccurate information that it has provided. At a minimum, we expect that Entergy will provide full, accurate information on the underground piping, a full explanation of how the incorrect information was provided and why it was not corrected, and a description of what steps Entergy has taken and will take to rectify the situation and prevent it from happening again.

III. CONCLUSION

The two newspaper articles, with photographs, proffered by NEC contradict the testimony of Entergy VY witnesses and support findings relevant to aesthetics or mitigation. Moreover, the articles alerted NEC to the fact that more authoritative information on the relevant topic was "out there" to be found. NEC found the information and has presented it here as supporting information. If on having seen NEC's post hearing filings the Board is nurturing any remnant of a presumption that the CPG petitioner and its witnesses are consistently telling the truth it should on reviewing the evidence put that

presumption aside and let the burden of proof return in full to the petitioner.

...the Board adheres to the "bursting bubble" concept of rebuttable presumptions, that is, "whenever evidence sufficient to put a presumed fact in issue has been adduced by the party against whom the presumption operates, the presumption entirely disappears and is of no evidentiary significance, with the burden of persuasion resting where it was at the beginning of the litigation

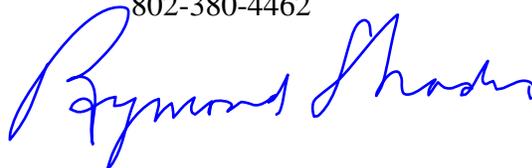
In re Petition of Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc., for a certificate of public good to modify certain generation facilities at the Vermont Yankee Nuclear Power Station in order to increase the Station's generation output, Docket 6812, Order of 3/15/04 at 80 n. 156.

In consideration of the foregoing good reasons, the Board should take judicial notice of the two proffered news articles and their contents. In the alternative the Board should take notice of NEC Reply Exhibits One through Four.

Respectfully Submitted
on Behalf of New England Coalition
This Tenth Day of March, 2016



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