

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 2027-A

IS ISSUED TO:

Lasiter Construction
505 West Dixon Drive
Little Rock, AR 72206
Pulaski County
CSN: 88-0724

THIS PERMIT IS YOUR AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND YOUR APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 ET SEQ.) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date

SECTION I: FACILITY INFORMATION

PERMITTEE: Lasiter Construction
CSN: 88-0724
PERMIT NUMBER: 2027-A

FACILITY ADDRESS: 505 West Dixon Road
Little Rock, 72206
COUNTY: Pulaski

CONTACT POSITION: Michael Lasiter, President
TELEPHONE NUMBER: 501-779-7000

REVIEWING ENGINEER: M. Lloyd Davis, P. E.

UTM North-South (Y): Zone 15 [3836.466 km]
UTM East-West (X): Zone 15 [566.711 km]

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SECTION II: INTRODUCTION

Summary

Lasiter Construction currently operates an asphalt plant at 711 Delta Drive, off Route 338 southeast of Little Rock (CSN: 88-0337). Lasiter Construction will purchase and operate a portable air curtain destructor (CSN: 88-0724) for use initially at a location across from the asphalt plant. The air curtain destructor (ACD) is used for disposing of land clearing debris and other combustible solid waste with controlled combustion to minimize emissions of particulates. The unit is capable of disposing of debris including tree stumps and combustible construction site waste that includes clean lumber and wood waste. It is anticipated that the ACD will operate between 30 to 45 days during the calendar year. This permit will authorize the re-location of the ACD to other locations with the same limitation after written approval from the Department.

The ACD uses a high velocity curtain of air to contain the smoke within the fire pit and control the opacity of the gaseous and particulate emissions. The curtain of air also injects excess oxygen into the fire and raises the temperature above 1600EF, reducing burned debris to 1% or less of its original volume. The high temperature burns off many pollutants that would otherwise escape into the atmosphere or ground water during open burning. At the same time, the large excess of air minimizes the formation of NO_x, so that emissions of NO_x and SO₂ are negligible.

Process Description

The Whitton Technology mechanical combustion unit (MCU) is a portable refractory-lined combustion box that varies from 27 to 37 feet in length, 7 to 12 feet in width, and 7 to 10 feet in height. The proposed unit is the larger size S-127 MCU, and is capable of incinerating 140 tons of wood waste and debris in an 8 to 10 hour day. This would be the equivalent of a 175 MMBtu/hr burner.

The MCU is initially loaded with small, dry brush or wood to a depth of about two to three feet, which is then covered with larger diameter logs and then stumps. The material is then well packed and leveled at the top of the fire box. The contents are typically ignited with 5 gallons of diesel fuel spread over the wood waste and a torch used to ignite the starter fluid.

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As the fire begins the associated blower driven by a small 4-cycle diesel engine, which is listed in the permit as an Insignificant Activity, is started, creating the air curtain that forces air down into the smoldering fire. As the fire progresses with increased air velocity, the rpm of the blower is proportionately increased. This lowers the initial opacity from about 25% to the required 10% maximum opacity when the blower reaches about 2,000 rpm. At peak rpm, a minimum average discharge air velocity from the blower nozzle is 9,000 cfm, which is directed down an air disbursement manifold over and then down into the combustion zone. Temperatures typically range between 1,600EF and 2,300 EF after an hour.

The firebox is continuously loaded during the day to maintain optimum temperatures. The additional loading is stopped two hours before planned shut-down of the unit, with the blower airflow maintained as the fire dies down. About 5% of the weight of the wood waste remains as ash, and must be removed every few days.

Regulations

This facility is subject to the following regulations: Regulation 18, *Arkansas Air Pollution Control Code* and Regulation 19, *Regulations of the Arkansas Plan of Implementation for Air Pollution Control*. The air curtain incinerator is subject to NSPS Subpart CCCC, *Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Is Commenced After November 30, 1999 or for Which Modification or Reconstruction Is Commenced on or After June 1, 2001*, as it meets the definition of an air curtain incinerator burning only wood waste, but must comply only with the opacity limitations of '60.2250 and the testing requirements of '60.1925.

Permit 1700-A, issued to Arkansas Asphalt Company, Inc., at the above address, allows 93.5 tpy of CO emission. The emissions of the portable air curtain incinerator would bring annual CO emissions above the threshold for a major source permit. Although the initial location of the proposed incinerator is adjacent to this facility, it is outside the perimeter of the facility and is an operation that is not connected with the asphalt plant. Under Section 26.706 the Department is authorized to issue a single permit for similar operations by the same source owner or operator at multiple temporary locations

The following table is a summary of the facility's total emissions.

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TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	3.1	2.4
PM ₁₀	3.1	2.4
CO	27.62	20.0

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SECTION III: PERMIT HISTORY

This is the initial permit for the air curtain incinerator.

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SECTION IV: EMISSION UNIT INFORMATION

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-20 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
01	Whitton Technology Air Curtain Incinerator	PM ₁₀ CO	3.1 27.62	2.4 20.0

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
01	Whitton Technology Air Curtain Incinerator	PM	3.1	2.4

NSPS Requirements

3. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.2250(a), visible emissions shall not exceed 35% opacity as measured by EPA Reference Method 9 during the start period that is within the first 30 minutes of operation, and must not exceed 10% opacity (6 minute average) at all times after the 30 minute startup, except during malfunctions. Each malfunction must be reported in accordance with General Condition #10 and in no event may exceed 3 hours.
4. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.2255, the permittee shall conduct an initial test for opacity as specified in §60.8, using Method 9 of Appendix A, when the air curtain incinerator unit is operating at full capacity.

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5. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.2255, after an initial test for opacity as specified in §60.8, the permittee shall conduct annual tests for opacity no more than 12 calendar months following the date of the previous test, using Method 9 of Appendix A, with the air curtain incinerator unit operating at full capacity.
6. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from SN-01 shall be conducted by personnel trained in EPA Reference Method 9, including an observation for startup and normal operations.
7. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.2260, the permittee shall notify the Department of the planned initial startup date and keep records of all initial and annual tests for at least 5 years. These records shall be made available to Department personnel upon request.
8. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.2245, the permittee shall burn only wood waste, clean lumber and yard waste, or mixtures of these in the air curtain incinerator. Wood waste is defined as untreated wood products, including tree stumps, trees, bark, limbs, sawdust, chips, scraps, slabs, millings and shavings. It does not include clippings, bushes and shrubs from residential, commercial or industrial properties.
9. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303.
10. Pursuant to §18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne.
11. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not process more than 18 tons (90 cubic yards) per hour of bulk wood waste in the air curtain incinerator. Compliance with this limit will be demonstrated by not adding combustible material above the top of the air curtain incinerator.

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12. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not operate the air curtain incinerator more than 10 hours per days, and more than 45 days in any calendar year at this initial location and other locations subsequently approved by the Department.
13. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall record the date of each use of the air curtain incinerator and opacity observations required by Specific Condition #6. Computer records are acceptable. These records shall be made available to Department personnel upon request.
14. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall notify the department, in writing, 30 days prior to the commencement of operation at any new location. This notification must include the new location. Upon receipt of such notification, the Department may authorize the operation as proposed by the permittee, or when the plant is proposed to be operating in areas of high population density or in areas where the National Ambient Air Quality Standards are threatened, the Department may require more stringent controls.
15. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, during the 30 day notification the permittee will be provided a copy of an intent of initial location or relocation. The notice must be published, at least 10 days prior to relocation, in a newspaper of general circulation in the county in which the facility is to be relocated pursuant to A.C.A §8-4-203. The permittee shall provide, to the Department, proof of publication and proof of payment of the notice before authorization for relocation can be approved.
16. Pursuant to §26.302(A) of Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the portable equipment covered by this permit shall not be operated on a site where the combined emission limits of all equipment located on the site for any criteria pollutant exceeds 100 tpy.

All equipment on site must be considered in determining the total emission limits at the location, unless the equipment has a different 2-digit Standard Industrial Classification code and the equipment is not a support facility. A support facility is typically a facility which conveys, stores or otherwise assists in production of the principal product.

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SECTION V: INSIGNIFICANT ACTIVITIES

The following types of activities or emissions are deemed insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated July 26, 2002.

Description	Category
Diesel powered small engine for blower	A-1

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SECTION VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
3. Pursuant to §19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the Department shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
4. Pursuant to §19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, construction or modification must commence within eighteen (18) months from the date of permit issuance.
5. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, records must be kept for five years which will enable the Department to determine compliance with the terms of this permit--such as hours of operation, throughput, upset conditions, and continuous monitoring data. The records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.

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6. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any reports required by any condition contained in this permit shall be certified by a responsible official and submitted to the Department at the address below.

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

7. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
8. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
9. Pursuant to §19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

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10. Pursuant to §19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if the permittee exceeds an emission limit established by this permit, they shall be deemed in violation of said permit and shall be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met:
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and that all reasonable measures have been taken to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee shall submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, it need not be submitted again.

11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act
 - c. To inspect any monitoring equipment or monitoring method required in this permit
 - d. To sample any emission of pollutants
 - e. To perform an operation and maintenance inspection of the permitted source

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12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus.
13. Pursuant to §19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
14. Pursuant to §19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit may be transferred. An applicant for a transfer shall submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.
15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.
16. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.
17. Pursuant to Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit supersedes and voids all previously issued air permits for this facility.

APPENDIX A
NSPS Subpart CCCC

Public Notice

Pursuant to A.C.A. '8-4-203, and the regulations promulgated thereunder, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Lasiter Construction currently operates an asphalt plant at 711 Delta Drive, off Route 338 southeast of Little Rock (CSN: 88-0337). Lasiter Construction will purchase and operate a portable air curtain destructor (CSN: 88-0724) for use initially at a location across from the asphalt plant. The unit is capable of disposing of debris including tree stumps and combustible construction site waste that includes clean lumber and wood waste. It is anticipated that the ACD will operate between 30 to 45 days during the calendar year. Emissions of CO are limited to 20.0 tpy, and particulates must be maintained at a very low level to meet the opacity limitations of the permit.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Doug Szenher, Public Affairs Supervisor. Citizens desiring technical information concerning the application or permit should contact Lloyd Davis, Engineer. Both Doug Szenher and Lloyd Davis can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Little Rock Public Library, 100 South Rock, Little Rock, AR 72201. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Doug Szenher. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8).

Dated this

Marcus C. Devine
Director

APPENDIX B

APPENDIX C

Request for PDS Invoice	
Invoice Number <i>(assigned when invoice printed)</i>	PDS-

AFIN r				
Name <i>(for confirmation only)</i>				
Invoice Type (pick one) r	Initial	Mod	Variance	
	Annual	Renewal	Interim Authority	
Permit Number r				
Media Code r	A			
Fee Code or Pmt Typer	MS			
Fee Description <i>(for confirmation only)</i>	Minor Source			
Amount Due r <i>(whole dollar amount only)</i>				
Printed Comment <i>(600 characters maximum)</i>				

<i>Note: The information below is for use by the requesting division if desired; it will not print on the invoice.</i>	
Engineer	
Paid? (yes/no)	
Check number	
Comments	

r **Required data** (See "g:\Misc\PDS_FeeCodes.wpd" for descriptions and discussions of fee codes)

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Request submitted by:

Date:

Public Notice

Pursuant to A.C.A. §8-4-203, and the regulations promulgated thereunder, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

[Must Contain: Facility Name; CSN; Address; Activity Involved in Permit Action; If Modification, include change in emissions; Comments may only be given on modifications]

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Doug Szenher, Public Affairs Supervisor. Citizens desiring technical information concerning the application or permit should contact , Engineer. Both Doug Szenher and can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the *[LIBRARY and ADDRESS]*. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Doug Szenher. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8).

Dated this

Marcus C. Devine
Director