

MINUTES OF MEETING
TECHNICAL REVIEW AND ADVISORY PANEL (TRAP)
January 28, 2010

Members present were:

Robert Harper III, Florida Home Building Industry, Chairman
Frank Dragoun, Consumer Representative
Scott Franz, Soil Scientist
Scott Johnson, P.E., Florida Engineering Society
Greg Liskey, Septic Tank Manufacturer
Tony Macaluso, Real Estate Professional
Russell Melling, County Health Department
Ken Odom, Home Building Industry
Patti Sanzone, Florida Environmental Health Association
Derek Woodruff, Septic Tank Industry

Alternate members present:

Chris Brown, Septic Tank Industry
Ed Cordova, Local Government
Oren Reedy, Soil Scientist
William Sirmans, County Health Department
Clay Tappan, Florida Engineering Society
Pamela Tucker, Real Estate Professional

Department of Health staff present:

Gerald Briggs, Chief, Onsite Sewage Programs
Marcelo Blanco, Environmental Health Program Consultant
Paul Booher, P.E., Professional Engineer III
Bart, Harriss, Environmental Manager
Dale Holcomb, Environmental Administrator
Shirley Kugler, Administrative Assistant
Eberhard Roeder, Professional Engineer III

Absent members and Alternates:

Raymond Collins, Florida Environmental Health Association
Dikran Kalaydjian, Home Building Industry
Roy Pence, Home Building Industry
Paul Steinbrecher, Local Government
Ellen Vause, Septic Tank Manufacturer

Speakers:

Sam Averett, Averett Septic Tank Co.
Quentin (Bob) Beitel, Markham Woods Assn., Inc.
Michael Broom, for State Senator Andy Gardiner
Dominic Buhot, Green's Environmental Services

Gary S. Duren, Code Compliance, Inc./Highland Tank & Mfg. Co.
 Doug Everson, Homeowner/PTI, Inc.
 Sarah Fowler, for Orange County Commissioner Fred Brummer
 Keith Hetrick, Florida Home Builders Association
 John Higgins, Markham Woods Association, Inc.
 Ken Jones, Markham Woods Association, Inc.
 Cory Mong, Economy Septic, Inc.
 Maria Pecoraro, for State Representative Bryan Nelsen
 Andrea Samson, Homeowner
 Carol Saviak, Coalition for Property Rights
 Nancy Smith, Orange County Health Department

Others present:

Interested persons including representatives from:
 County Health Departments
 Florida Onsite Wastewater Association
 Industry Representatives

The meeting was called to order at 9:10 AM. Following welcoming remarks and introductions, Mr. Harper proceeded with a review of the minutes from the August 27, 2009 meeting. Mr. Harper referred to page 2 of the minutes and asked about the inventory of onsite systems regarding the number of systems and the maintenance of those systems that was to be made available to the panel members. He wanted to know if compilation of the inventory by the department is complete. Mr. Briggs responded affirmatively and Mr. Harper requested that a copy of the report be sent to each panel member. Mr. Liskey asked about the various research studies listed on page 3. Dr. Roeder responded with a synopsis of each; stages of completion, draft reports, etc. Mr. Harper requested that upon completion of these reports, instead of just posting the information to the website that the TRAP be notified by email or mail that the report is complete and can be viewed on the website. There were no further questions or comments about the remaining pages. Mr. Liskey motioned, seconded by Mr. Melling, to approve the minutes as written and the panel concurred.

Dr. Roeder, using power point graphics, presented an update of the research program focusing on the Florida Onsite Sewage Nitrogen Reduction study. A Department of Health Interim Progress Report on the Florida Onsite Sewage Nitrogen Reduction Strategies Study was prepared pursuant to Line Item 471 Section 3, Conference Report on Senate Bill 2600, and General Appropriations Act for Fiscal Year-2010. The main recommendation in the draft report is for continued funding to accomplish field testing of technologies at home sites, to continue the evaluation technology development, and to do the model development to determine nitrogen fate. The deadline for the final study report for this year is May 1. What happens afterwards depends on funding. Mr. Harper asked the status of the funding. Dr. Roeder replied that the draft Interim Report recommends the Legislature provide funding and budget authority to the department in the amount of \$2 million for the fiscal year 2010-2011 for continuation of the contract and associated tasks. Mr. Harper asked how important the funding is for the second phase and if the second phase is for the actual testing. Dr. Roeder said the technology development is somewhat in an in-between phase because there is no funding at present to get that started. Mr. Harper reflected on the \$1 million allocated to do the first phase and asked who initiates the funding for the second phase. Mr. Briggs responded that it would have to be done by the Legislature; the draft Interim Report recommends and says quite clearly that additional funding is needed to complete this study with the tasks that were originally outlined. If funding is not allocated then we will need to look at

where we will go from there but we do anticipate that all of the initial million dollars will be spent by the end of this year. We have a limited amount of data but not the full scope of what was anticipated or what we would like to see. Upon further reflection Mr. Harper asked if a letter should be composed from the TRAP stating the panel's concerns about completion of the research and appealing to the Legislature to fund the next phase of the project. Dr. Roeder read verbatim from the draft Interim Report the summary paragraph:

The Florida Department of Health and the Research Review and Advisory Committee recommend that the Legislature provide at least \$2 million to fund the next phase of the project, primarily for field monitoring over at least a one year monitoring period of performance and cost of technologies at home sites, and of nitrogen fate and transport. This funding also will continue the development and monitoring work at the test facility, and of modeling. Additional funding will be needed from the 2011 Legislative session to complete monitoring and other field activities, additional testing as deemed appropriate by the Legislature and final reporting with recommendations on onsite sewage nitrogen reduction strategies for Florida's future.

Discussion followed with comments of agreement from panel members and audience participants that a letter be sent. Mr. Macaluso observed that the first phase appeared to be a down payment on what ultimately needs to be done and, if that is true, then we would have to make the second request to see the actual field work that proves the theories that are in the assessment done in phase 1. Mr. Harper expressed concern about all the work that has been done by the department, the Technical Review and Advisory Panel (TRAP), industry representatives and others and now we are at the point where the next step is getting more funding to achieve the results that we seek. Ms. Tucker talked about the Research Review and Advisory Committee's (RRAC) review, guidance and approval of some of the terminology and verbiage that went into the report due February 1 that is the tool to ask for the funds. The information is very specific to what is needed now, what will be needed in the future and how the money is to be used; and she believes the TRAP should write a letter in support of additional funding. Mr. Liskey also agreed that the TRAP should send a letter in support of the continued funding for this research. He understands that the information that has been collected to date with the original million dollars is not enough information to make the final decision. He feels that it is imperative that additional funding is created. Mr. Briggs reiterated that the Interim Report is the prime mechanism to request the Legislature to make a determination to provide additional funding. The Interim Report is a detailed accounting of what has been done and what is needed to finish. Mr. Macaluso motioned that the TRAP recommend to the Governor, Legislature or any of the people that would be in decision making authority for this request for funding to complete the second phase. Mr. Dragoun called the second to the motion. Mr. Johnson added that the letter of appeal should also speak to the problems and pitfalls that will arise if the funding is not provided. Keith Hetrick spoke about Senator Constantine's recent expressions of being tired of studying the issue and the need to move on. Mr. Hetrick said this is not only a study about nitrogen but a study about solutions to the problem. Mr. Brown reflected about the ongoing battle to secure funding and agrees with sending a letter. He said there is a perception by the general public that we are just spinning our wheels and nothing ever gets done. Mr. John Higgins, with the Markham Woods Association, talked about negative comments about the slowness of the research spoken by Senator Constantine during a recent meeting that he attended. He urged the panel to send a letter reflecting that the panel's consensus on this issue is clearly understood. Doug Everson expressed his thoughts that the Department of Health has a responsibility to request the two million dollars whether it is granted or not. Roxanne Groover noted that the Florida Onsite Wastewater Association and the Department of Health are working hand-in-hand to get the needed funding. Mr. Macaluso stressed the urgency

to make very clear the need for the second phase to come up with fact based information for the decision making that needs to be done. Mr. Harper called for a vote on the motion made earlier for a letter to be composed and sent by Mr. Harper appealing to the Legislature for the needed funding. Ensuing conversation added to the motion to include in the letter the summary paragraph from the Interim Report plus the concern about the ramifications of what might happen if the study is not completed. The panel unanimously approved the motion to send a letter.

Dr. Roeder continued his presentation with updated information about other research projects beginning with the Manatee Springs State Park Phase II Karst Study. He also talked about Performance Based Treatment Systems (PBTS) assessment in Monroe County to develop a sampling protocol to evaluate variability of concentrations in PBTS and some ATUs in the Keys. The sampling is completed but quality control of existing data needs to be completed. Dr. Roeder briefly described the 319 Project on Performance and Management of Advanced Onsite Systems and noted that Patti Sanzone is the project manager on the Department of Environmental Protection side. The project seeks a better sense of ATUs and PBTS' in the state by looking at data gathered from different databases, i.e. state database (EHD), any county specific databases, and Carmody records. He spoke about the challenge to make the databases compatible. Dr. Roeder talked last about the study of the Town of Suwannee to access water quality development 13 years after sewerage. Ms. Tucker asked for clarification of the DOH budget as it relates to these different studies drawing a comparison for the budget for the Nitrogen Reduction study that is dependent upon Legislative approval. Mr. Briggs responded that these are two different situations, the research projects that were reviewed today were funded from a administrative trust fund of monies collected from the \$5 research fees; further explaining that budget authority must be granted by the Legislature to use the cash in that trust fund. However, we do not have the cash for the continuation of the nitrogen study so we need an allocation from the Legislature for that money as well as budget authority to spend it. It is easier to request budget authority for cash on hand as opposed to asking the Legislature to appropriate an additional amount of cash to the department and then grant budget authority to spend it.

Issue 08-15 – Bedroom Definition
Rule Sections: 64E-6.002

Mr. Harper described the origination of this proposed issue that was derived from the Florida Building Code Commission's desire for consistency between their definition and the Department's definition for bedrooms. For the past year and a half there has been an ongoing effort between the TRAP and the building commission to develop simplified language.

Mr. Holcomb explained the latest idea is to flatten out the curve of gallons per day (GPD) for larger houses. He distributed a comparison graph depicting different colored lines and symbols to explain the latest proposed language. Mr. Holcomb referred to building code language that speaks to the 70 sq. feet room, closets, emergency escape, and types of doors and so on. Mr. Melling commented about mobile homes as defined by HUD under Federal rule. Mr. Briggs observed that one of the issues has been that the Building Code does not deal with mobile homes in contrast to the department's requirement to not only deal with mobile homes but with older mobile homes as well as older houses. The building code is all about current construction. He expressed uncertainty of being able to ever acquire complete sync with the Florida Building Code Commission on the bedroom issue. He recognized one of their concerns as being the sizing of mega homes which the department is attempting to address. Mr. Harper said the Florida Building Code Commission is also concerned about the inconsistency among the health departments defining bedrooms reiterating that their desire is to bring about consistency in all the health departments when defining a bedroom. Discussion ensued. Ms. Sanzone said she likes this latest

premise except for the part of the emergency escape and rescue opening. Mr. Johnson expressed his concurrence except that he would like to see a modification to address the pre 1983 homes so that older homes with smaller bedrooms could be addressed. Ms. Sanzone motioned to adopt the change in Table 1 and then to table the issue giving time for thorough review. Mr. Odom called the second and the panel concurred. Mr. Harper concluded by stating that a letter of explanation of today's decision should be sent to the Building Commission.

Issue 09-01 – Non Transient Recreational Vehicle Space Flow
Rule Sections: 64E-6.008 Table 1

Mr. Holcomb gave a brief update of this issue that was tabled at the August 27, 2009 meeting to incorporate park model language. Language was crafted that proposes changes to provide an estimated daily sewage flow for non-transient recreational vehicle spaces that is the same as the flow for mobile home spaces. A few questions followed. Mr. Macaluso, seconded by Ms. Sanzone, motioned to approve the issue. The panel voted their approval.

Issue 09-04 – Portable Restroom Cleaning Requirements
Rule Sections: 64E-6.0101

Mr. Holcomb explained this issue that was approved at the last meeting and then sent to the variance committee. Mr. Holcomb said members of the variance committee were generally positive but were concerned about the graffiti language in the last sentence of (h). A brief discussion resulted in consensus of removing the last portion of that sentence. “The exterior of the portable restroom shall be cleaned periodically ~~and a graffiti remover should be used on both the interior and exterior walls as deemed necessary.~~” Mr. Odom motioned approval with Mr. Melling calling the second. The motion passed.

Issue 09-07 – Low Pressure Design
Rule Sections:

Initiated by David Scharr, PE, this issue allows a drainfield between 1000 and 2000 square feet to be split into two drainfields and not have to be low-pressure dosed. The issue was approved by the TRAP and then sent to the variance committee for review where it received mixed comments. Discussion followed. Mr. Briggs stated that the Department's preference is to see low-pressure dosed systems with the opinion that they are better systems in the long run and prolong the life of the system. Mr. Averett agreed that larger systems between 1000 and 2000 gallons of flow could be split in drainfield, but in his opinion should still be low-pressure dosed. Low pressure dosing will insure longer life of the drainfield. Varying comments followed. Mr. Woodruff, Mr. Odom, and Mr. Brown said they thought the split system language in this issue is a great idea. Mr. Liskey motioned to approve, seconded by Mr. Odom. There were five votes for approval and five votes against with Mr. Harper breaking the tie with his vote to approve the issue. Approved. Mr. Harper asked those who voted against for a consensus of the reason for their negative vote. Mr. Franz stated the flow from gravity to dosing is a concern and that down the road, failures will occur quicker with gravity systems than low pressure dosing systems.

Issue 09-14 – Protected Steel Treatment Receptacles
Rule Sections: 64E-6.013

Mr. Gary Duren, Code Compliance Inc., and John Campbell, Highland Tanks Inc., initiated this issue that proposes changes to allow and create standards for grease interceptors made of protected steel. Since the August 27, 2009 TRAP meeting, Mr. Duren has worked with DOH staff

on language to make sure DOH can approve the issue. He noted one small typo on line 367 where the word **and** should be **an**. The proposal addresses the minimum performance requirements for coated steel tanks. The current code allows grease interceptors to be made of concrete, fiberglass and polyethylene. Mr. Booher spoke briefly and displayed a sample of the coated steel used in the grease interceptors. Discussion followed with questions about warranties, damages that might occur to the exterior of the tanks in shipping and handling, etc. Questions were satisfactorily answered. Mr. Johnson, seconded by Ms. Sanzone, motioned to approve the issue. A unanimous vote of approval followed.

Before continuing with the issues, Mr. Harper recognized Mr. Ken Jones with Markham Woods Association who requested a few minutes to voice a concern. Mr. Jones began by complimenting the TRAP for doing a very good job. He continued by stating that Markham Woods Association recommends to the TRAP that a motion be made and approved by the TRAP membership authorizing their Chairman, Mr. Harper, to send a letter to the Governor and the Florida Legislature prior to the commencement of the 2010 Florida Legislative session stating the absolute necessity for the TRAP and RRAC organizations to remain with the Florida Department of Health in order to preserve the legislative intent of the creation of these organizations by the Florida Legislature back in 1996. Since the inception of TRAP, it is his understanding that no administrative rule approved by TRAP has been overturned in the legal process. The purpose of TRAP is to protect the tax payers of Florida by insuring that any proposed Administrative Rule by the Department of Health is properly reviewed and examined with the participation of the public and the expertise of the representatives of the TRAP. He reiterated that the folks with the Markham Woods Association do not want to have this proven, successful process be removed from the public. Mr. Harper interjected that the different associations and organizations who appoint the TRAP and RRAC membership need to take it upon themselves to write the letter suggested by Mr. Jones. He feels that it would be more effective for the Septic Tank Association, the Realtors, the Engineers and the environmental groups, etc. to write expressing their position of ensuring that the TRAP and RRAC continue to provide this valuable service. Mr. Jones added that his organization represents about 20 subdivisions and about 2,800 homeowners and stated that they would be most happy to send letters. Mr. John Higgins, also with the Markham Woods Association, added his support stating that he wants to continue dealing with the Department of Health.

Issue 09-10 – Septage Logs
Rule Sections: 64E-6.010

Mr. Holcomb explained this new issue that is a provision to require the submission of hauling logs of septage and holding tank waste to the Department. Currently the logs are maintained by the sludge haulers. Mr. Liskey asked about the taking and monitoring of this information and wanted to know if the additional paperwork and monitoring would increase fees. Mr. Briggs replied that there is no expectation of an increase in fees. The simplest method would be to copy the logs that are produced and send those to the Department. Inputting the information into the Carmody System would also be acceptable. The Department wants this information to continue building and refining that inventory and this would be an important component to do that. Currently the department is not capturing this information in any way. It is produced by the haulers but it is not sent to the Department. Mr. Brown wanted to know what the department would be looking for upon receiving information from the log. Mr. Briggs replied that the log would confirm location of systems and tank size. Mr. Corey Mong spoke briefly about his reasons for agreeing with this proposed issue. Mr. Macaluso, seconded by Mr. Franz, motioned to approve the issue and the panel concurred.

Issue 09-13 – Septage Storage Tanks
Rule Sections: 64E-6.010

Mr. Holcomb briefly explained this proposed issue that eliminates the 3000-gallon minimum tank size requirement for septage storage tanks. Current language lumps septage storage tanks into stabilization tank requirements in order to require them to meet some standard. However, some stabilization tank requirements are not applicable to storage tanks. Mr. Odom motioned to approve the issue. Mr. Liskey called the second and the panel followed with a unanimous vote of approval.

Issue 09-15 – Duplexes on One Lot
Rule Sections: 64E-6.004

The purpose of this proposed issue is to clean up language regarding when lots need to be tied together, essentially multiple businesses on multiple lots or a single business on multiple lots. The proposed changes clarify when a deed restriction is required for duplexes on single lots or establishments on multiple lots. Mr. Harper questioned the verbiage about a written utility easement. He did not see reference to a covenant and stated that a restricted covenant is very different from an easement and was unclear about the intentions of the language. Brief discussion continued culminating in Mr. Sirmans motioning approval. Mr. Franz called the second and the panel voted approval.

Issue 09-16 – Triple-Wide Mobile Home Spaces and
Cleanup Language for MHP Space Sizing
Rule Sections:

Mr. Holcomb proposed this issue that was suggested by the Department's Bureau of Community Environmental Health and explained that the rule contains no sizing for triple-wide mobile home spaces. He also said the current language about multiple spaces per system versus one space per system needs revision. Sizing criteria for triple-wide mobile home spaces in Mobile Home Parks is addressed by this issue. Mr. Harper suggested slightly changing some of the language to read ...*"to a shared individual onsite system"*. There were no further comments from the panel. Mr. Liskey, seconded by Mr. Odom, motioned to approve. The panel concurred.

Issue 09-17 – Site Plans
Rule Sections: 64E-6.004

Another new issue with language more specific about what scales are appropriate and how much tolerance is allowed in that scale. Discussion ensued about scale sizing and that the standard coming off a blueprint machine is 24 X 36. Mr. Briggs said language will be added to allow site plans to be submitted on 8.5 X 11 inch up to 24 X 36 inch paper. Mr. Dragoun, seconded by Mr. Johnson motioned to approve the issue with that change. The panel voted approval.

09-18 – PBTS Plans
Rule Sections: 64E-6.026

Mr. Holcomb quickly explained that the current rule requires two copies of all documents and that in most cases one copy would be enough. This proposed language will cut down paperwork by requiring all plans to be signed and sealed but does not specify the number of

copies to submit. Mr. Liskey motioned to approve with Mr. Odom calling the second. The panel voted approval.

09-19 – Commercial Sewage Waste Definition
Rule Sections: 64E-6.002

Mr. Holcomb said the language in this issue modifies the definition of commercial wastewater to agree with the definition that is in use in the interagency agreement between DEP and DOH. The definition in the rule is more restrictive than in the interagency agreement. Following a brief discussion Mr. Odom motioned to accept the issue. Mr. Liskey called the second followed with panel approval.

09-20 – Incinerating Toilets
Rule Sections: 64E-6.009

This proposed language updates the reference to incinerating toilet standards. There were no comments. Mr. Odom, seconded by Mr. Liskey, motioned to accept the issue. The panel voted approval.

09-21 – Inspection by Engineers
Rule Sections: 64E-6.003

The current rule exempts engineer-designed residential systems from being inspected by an engineer. The proposed changes will require all systems that were designed by an engineer to be inspected by that engineer. Mr. Brown was concerned by the wording "...to be inspected by **that** engineer." If **that** engineer goes out of business or is inaccessible for any reason then what does one do to get inspected. Mr. Johnson suggested removing **that** and replace with the **engineer of record**. Further discussion resulted in the striking of language on lines 24 and 25. Mr. Macaluso motioned to accept the issue with the noted changes. Mr. Odom seconded the motion that carried with a vote of approval by the panel.

Other Business and Public Comment.

Mr. Cory Mong reiterated his concerns to the panel once again about the requirement for testing of polyethylene tanks. He recalled that the panel voted approval at a previous meeting to add to the rule the requirements for the retesting of polyethylene tanks. To date he has not seen that happen. He also talked about the premise of establishing special testing for polyethylene tanks but, again, that has not happened. He stated his opinion that polyethylene tanks are treatment receptacles along with pre-cast tanks, they all get buried at the same depths, they all have the same purpose and there should not be a different test for them. He feels the testing should be the same all across the board. He said the panel is here to protect the onsite industry and reiterated that something needs to be done. Mr. Briggs agreed with Mr. Mong that when the standards were changed for polyethylene tanks that there was no requirement for those tanks already approved to be retested under the new standard. He also noted in contrast that concrete tanks are always required to undergo retesting upon any changes to their standards. He stated his agreement the need to press ahead with a rule change that says polyethylene tanks must be retested under the current standard and give them a year to comply. Mr. Harper advised bringing that forward as an issue. Mr. Booher also expressed his agreement with Mr. Mong and said he has gone to considerable lengths to find an appropriate test for polyethylene tanks but so far has been unsuccessful. Mr. Brown wondered if the problem could be an installation issue. Mr. Briggs

stated the bottom line is that there are updated standards for these tanks in the rule and the manufacturers need to demonstrate that they meet those standards.

Mr. Briggs talked to the panel about a letter that was distributed at the beginning of the meeting from Apalachee Backhoe and Septic Tank. The Apalachee Backhoe company is proposing that the rule be modified to allow them to do a partial replacement of moderately limited soil with slightly limited soil under the drainfield. Mr. Briggs sought opinions from the soil scientists. Department staff is concerned that the change in interface could, in some cases, cause an artificial rise in the water table. An immediate problem is that there is no data available to study so we are seeking input on how to look at this issue and what the panel's thoughts are. Mr. Franz commented that this is not a simple matter and said time is needed to thoroughly digest the request. Mr. Harper asked that Department staff bring the matter forward as an issue for thorough review and consideration.

Mr. Briggs said another problem for discussion is the maintenance entity issue with the aerobic treatment units and the performance based systems. People are very unhappy with what is perceived as a monopoly and no options to their maintenance entity even when they are very dissatisfied with the performance. The state of Texas recently modified their rule to require that the manufactures must provide parts and training to any licensed contractor who goes through a state approved training program. Department staff would like to look at doing this and feel that it would address a number of issues that would give consumers more options. Department staff likes what they see in the Texas program that addresses a lot of concerns. He asked Ms. Groover to briefly speak about this issue. She spoke of a recent meeting with several FOWA members to look at some of the challenges. The first challenge being does the homeowner have options on choosing a service provider? She stressed the need for intensive training for contractors specific to the different technologies and talked about avenues of providing the appropriate training. Opening this training to all contractors who are willing to take all those intensive steps of training would provide opportunity for homeowners to have a large number of well qualified individuals to choose from versus the limited options currently available. Mr. Harper asked if this would affect Chapter 489, Contracting. Mr. Briggs feels that most of this can be done in rule without statute changes. Ms. Groover stressed the intent is to make sure as an association that we have responsible maintenance entities.

Mr. Sam Averett talked about homeowners' maintenance of their ATUs and performance based systems. He has had a number of homeowners wanting to become certified in order to maintain their own systems. He wanted to know if he is allowed to do that. Mr. Briggs said a system owner can be approved as a maintenance entity for their owner-occupied single family residence. They must meet all requirements of the rule except for being licensed as a septic tank contractor.

Ms. Carol Saviak introduced herself and said she serves as Executive Director for the Coalition for Property Rights for Land Owners which is an advocacy group based in Orlando. She wanted to bring to the table a concern regarding a discussion of data collection and research and the statistical significance of results. Mr. Harper thanked her for her presentation but reminded her that despite limited time and funds the TRAP has made many accomplishments. Mr. Johnson and Ms. Tucker spoke defensively and definitively about the TRAP's presentations of research information.

A date for the next meeting was left open to sometime following the end of the Legislative Session. The meeting adjourned at 12:15 PM.

