



June 2, 2008

Trevor Bowman, Public Works Director
City of Siloam Springs
P.O. Box 80
Siloam Springs, AR 72761

RE: City of Siloam Springs PCI

AFIN: 04-00106 NPDES Permit No.: AR0020273

Dear Mr. Bowman:

On May 28 and 29, 2008, I performed a routine pretreatment compliance inspection of the waste water treatment facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated there under. This inspection revealed the following violations:

1. Yearly inspections conducted by the city on the industries were not being documented adequately for the calendar year of 2007. This is in violation of 40 CFR 403.8(f)(2)(vii). Some of the deficiencies observed on the inspections were the following:
 - a. Entry and exit time. Entry and exit time were not indicated for Gates Rubber. Exit time was not indicated on all of the inspections for 2007.
 - b. Inspection of chemical storage was not documented for Cobbs Vantress and Simmon Foods.
 - c. At Cobb Vantress, the inspection does not indicate that flow measurement was approved and verified, records reviewed, collection methods approved and verified. Sample location and sample location description was not documented at Cobb Vantress. There was no documentation on Cobb Vantress inspection for pretreatment system, residual management, solvent/toxic organic management, and very little for waste oil management.
2. City is not enforcing condition of the industry user's permit on sampling of duplicates for pH. At the time of inspection, it was observed duplicates were not being conducted on pH at Cobb Vantress and Gates Rubber.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Section of this Department at the following address:

Water Division Enforcement Section
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Trevor Bowman
June 2, 2008

This response should contain detailed documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by June 23, 2008.

For additional information you may contact the enforcement section by telephone at 501-682-0639 or by fax at 501-682-0910.

If I can be of any assistance, please contact me at 479-267-0811 ext 12 (west@adeq.state.ar.us).

Sincerely,

A handwritten signature in black ink that reads "Alison West". The signature is written in a cursive, flowing style.

Alison West
District 1 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



Form Approved
OMB No. 2040-0003

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code		NPDES										Yr/Mo/Day					Inspec. Type	Inspector	Fac. Type										
1	N	2	5	3	A	R	0	0	2	0	2	7	3	11	12	0	8	0	5	2	9	17	18	P	19	S	20	1	
Remarks																													
A		F		I		N		0		4		-		0		0		1		0		6							
Inspection Work Days						Facility Evaluation Rating						BI	QA	Reserved															
67						70	3					71	N	72	N	73												80	

Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) Siloam Springs Pollution Control Plant 975 Anderson Avenue Siloam Springs, AR 72761		Entry Time/Date 2:05 p.m./5-28-08 9:15 a.m./5-29-08	Permit Effective Date October 1, 2007
		Exit Time/Date 4:30 p.m./5-28-08 1:35 p.m./5-29-08	Permit Expiration Date September 30, 2012
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Tom Myers/Wastewater Superintendent/479-524-5623/479-524-4653			Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number Trevor Bowman/Public Works Director/479-524-5136/479-524-8513 City of Siloam Springs P.O. Box 80 Siloam Springs, AR 72761			
Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	M	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- Yearly inspections conducted by the city on the industries were not being documented adequately for the calendar year of 2007.
- City is not enforcing condition of the industry user's permit on sampling of duplicates for pH. At the time of inspection, it was observed duplicates were not being conducted on pH at Cobb Vantress and Gates Rubber.

Name(s) and Signature(s) of Inspector(s) <i>Joy Allison West</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville 479-267-0811 ext 12/479-267-0819	Date June 2, 2008
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: City of Siloam Springs

AFIN Number: 04-00106

NPDES Permit Number(s): AR0020273

Program Tracked under NPDES Permit Number: AR0020273

Fact Sheet Preparation Date: N/A

Date of Last PCI/Audit: 4-13-06/June 18-21, 2007

Date of Last Annual Report: August 31, 2007

Name of Inspector: Alison West

Date PCI Performed: May 28 and 29, 2008

Name, Title, and Telephone Number of Facility Representative:
Tom Myers, Waste Water Superintendent, 479-524-5623

Name and Title of Other Participants: NA

Number of IUs Visited: 2

Name(s) of IUs Visited: Gates Rubber Company and Cobb Vantress

AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. NA

2. Has ADEQ or EPA been notified of these changes? NA

3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** Yes, 2008

4. What procedures are being used to update the IU Survey?
Review of newspaper/phone book, review of plumbing/building permits, permit reapplication requirements, onsite inspections, questionnaire and permit information on internet.

5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 4

6. Number of Categorical Industrial Users: 2

7. How does the POTW determine the appropriate categorical standards to apply to an IU? Federal regulations are researched and appropriate standards are applied. EPA and ADEQ are consulted when assistance is needed.

8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
Franklin Electric	Metal Finishing	Phosphatizing
Gates Rubber Company	Rubber Manufacturing	Vulcanizers

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes

2. Describe any apparent problems with the local limits.
There are no apparent problems with the local limits.

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in		Comments:
		Permit:	Program:	
Metals:				
Influent:	<u>Quarterly</u>	<u>Quarterly</u>	<u>Not req.</u>	<u>None</u>
Effluent:	<u>Quarterly</u>	<u>Quarterly</u>	<u>Not req.</u>	<u>None</u>
Sludge:	<u>2 times/yr</u>	<u>2 times</u>	<u>Not req.</u>	<u>None</u>
Organics:				
Influent:	<u>Once/yr</u>	<u>Once/yr</u>	<u>Not req.</u>	<u>None</u>
Effluent:	<u>Once/yr</u>	<u>Once/yr</u>	<u>Not req.</u>	<u>None</u>
Sludge:	<u>Twice/yr</u>	<u>Once/yr</u>	<u>Not req.</u>	<u>None</u>

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?

No

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes, permit

2. How many IU permits (or other control documents) have been issued? 4

3. DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.
Yes

4. Does the control document contain the following items?

An expiration date: Yes

Discharge limitations: Yes

If the program requires self-monitoring by the IUs, do the Permits contain:

IU self-monitoring requirements: Yes

IU reporting requirements: Yes

5. Indicate which of the following recommended standard conditions are contained in the control documents:

Sample location: Yes
Type of sample: Yes
Monitoring frequency: Yes
Bypass prohibition: Yes
Right of entry: Yes
Nontransferability: Yes
Revocation clause: Yes
Penalty Provisions: Yes
Slug load notification: Yes
Notification of process change: Yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>Once/year</u>	<u>Once/year</u>
other SIUs	<u>Once/year</u>	<u>Once/year</u>
Inspection:		
categorical IUs	<u>Once/year</u>	<u>Once/year</u>
other SIUs	<u>Once/year</u>	<u>Once/year</u>

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? Yes

3. Are inspections announced or unannounced? Both

4. Are records kept of each inspection? Yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: No. Entry and exit time was not recorded for Gates Rubber. Exit times were not documented on Cobb-Vantress, Franklin Electric, and Simmons Foods.

Officials present: Yes

Inspection of chemical storage areas: This was not indicated on inspection for Cobb Vantress and Simmons Food.

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: No

Inspection of the pretreatment facilities: No

Review of self-monitoring records: Yes

Observation of IU self-monitoring procedures: No

Verification that approved analytical techniques are used: Yes

Verification of IU flow measurement (where required): No

6. Overall adequacy of inspection documentation: Inspection documentation needs to be more adequate.

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY). Yes

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes

9. Are sampling and flow monitoring equipment properly maintained? Yes

10. Is the POTW keeping proper field notes and chain of custody forms? No

11. Is the sampling location representative of the discharge to the collection system? Yes

12. Are sampling locations identified in POTW records? Yes

13. Are sampling services available in an emergency? Yes

14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? Reports are reviewed by the pretreatment compliance officer.

15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? Yes

16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? Yes

17. What are the POTW's procedures for following up violations?
The city responds as specified in its Enforcement Response Plan.

18. **HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?** N/A, There are no new categorical industries since the last inspection.

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:

Name and address: N/A

Other environmental permits held: N/A

Description of operations: N/A

Process flow diagrams: N/A

Flow measurements: N/A

Measurements of regulated pollutants: N/A

Certification of compliance by the IU: N/A

Compliance schedule (if needed): N/A

19. Additional comments on the POTW's inspection and sampling procedures: **Annual inspections conducted by the city on the industries need to be more detailed.**

Several items were not marked on the inspections. Entry and exit time were not indicated for Gates Rubber. Exit time was not indicated on all of the inspections for 2007. Inspection of chemical storage was not documented for Cobbs and Simmons. At Cobbs Vantress, the inspection does not indicate that flow measurement was approved and verified, records reviewed, collection methods approved and verified. Sample location and sample location description was not documented at Cobb Vantress. Nothing was marked for Cobb Vantress for Pretreatment System, residuals management, solvent/toxic organic management, and very little for waste oil management.

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes, the facility has an enforcement response plan.

2. How does the POTW respond to the following violations?

Effluent limitations: Follows written enforcement response procedures as outlined in the approved program.

Late reports: Follows written enforcement response procedures as outlined in the approved program.

Unpermitted discharges: Follows written enforcement response procedures as outlined in the approved program.

Slug loads or spills: Follows written enforcement response procedures as outlined in the approved program.

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? No significant violators for the FY 2007.

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
N/A			

5. Comments on the POTW's enforcement procedures:
Enforcement response procedures appear to be adequate.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? **Yes**
2. Are staffing levels adequate? **Yes**
3. Are the responsible officials familiar with the approved program? **Yes**

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW:
None
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? **N/A**
3. Does the POTW have copies of permits for IUs in other cities? **N/A**
4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? **N/A**
5. Comments on multijurisdictional issues: **None**

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Gates Rubber Company

POTW Name: City of Siloam Springs

Industry Contacts: Dennis Greeson, Safety Manager

Date and Time of Visit: 5-29-08 11:55 p.m.

Description of Manufacturing Process:
Manufactures rubber belts for automotive use.

Sources of Process Wastewater:
Contact and non-contact cooling water, steam condensate, and wastewater from the vulcanization process.

Categorical Industry? Yes

Basis for Limits: Categorical standards and local ordinance

Point of Application: End of discharge pipe

Description of Pretreatment Equipment and Procedures:
Belt oil skimmer.

Spill Prevention and Solvent Management Procedures:
An integrated contingency plan and an SPCC plan. Siemens picks up waste solvents.

Sampling Location and Equipment:
Manhole next to the flow monitoring building near the SE corner of the Gates Rubber building. Environmental Services Lab collects the sample by use of a portable sampler. Facility Has a 4210 Ultrasonic flow meter.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Cobb Vantress

POTW Name: City of Siloam Springs

Industry Contacts: Dan Cole, Sr. Environmental Manager

Date and Time of Visit: 5-29-08/11:15 a.m.

Description of Manufacturing Process:
Egg Hatchery

Sources of Process Wastewater:
Spent wash down water, rinse water, cleaning solution

Categorical Industry? No

Basis for Limits: Significant IU

Point of Application: End of discharge pipe

Description of Pretreatment Equipment and Procedures:
This facility does not pretreat wastewater.

Spill Prevention and Solvent Management Procedures:
Spill Prevention and Slug Control Plan. Jack Taylor picks up waste oil.

Sampling Location and Equipment:
Effluent flume located in the manhole adjacent to the flow monitoring building. This is located off the east side of Hwy 59 on the south side of the truck wash driveway. Facility uses ISCO 4210 Ultrasonic flow meter.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Alison West</u>	
NAME OF FACILITY:	<u>City of Siloam Springs</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0020273</u>	NPID
DATE OF PCI:	<u>May 28 and 29, 2008</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>4</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>2</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>0</u>	SNIN



June 13, 2008

Certified Letter# 7007 2680 0000 7213 9529

Mr. Dennis Benson
Water Division Enforcement Section
Arkansas Department of Environmental Quality
5301 North Shore Drive
North Little Rock, AR 72118-5317

RE: AFIN: 04-00106 – NPDES Permit No. AR0020273
Routine Compliance Evaluation Inspection Letter Dated June 2, 2008

Dear Mr. Benson:

Please allow this letter to serve as response from the City of Siloam Springs to the letter dated June 2, 2008 from Ms. Alison West regarding routine inspection of the City's wastewater pretreatment program. It should be noted that Ms. West performed her inspection of the pretreatment program on May 29th, that Ms. West drafted an inspection report promptly, but that the City did not receive the letter until June 12th. Ms. West required response from the City within three weeks of the date that she drafted her letter, thus allowing little more than one week for response from the City.

The following violations were cited regarding the method used for adequately documenting City of Siloam Springs inspection of industries.

1. Yearly inspections were not being documented adequately.
 - a. Entry and Exit time was not indicated in space on form. This will be corrected and in the future each space will be filled in on form.
 - b. Inspection of the chemical storage was not documented. Inspection of the chemical storage was conducted. However, it was not marked on form as performed. This will be corrected and in the future each space will be filled in on form.
 - c. At Cobb Vantress, the inspection did not indicate that flow measurement was approved, verified, etc. Cobb Vantress did have a copy of certification on file at plant but City staff was not asked by Ms. West to review the documentation at time of inspection. City of Siloam Springs field inspection form did not have all of the individual items marked during the inspection of Cobb Vantress. This will be corrected and in the future each space will be filled in on form.

2. The City is not enforcing requirements for sampling of duplicates for pH. The City of Siloam Springs has been working with industries on pH monitoring issues. See attached email documentation prior to inspection for Simmons Foods. Currently all four of the industrial dischargers use Environmental Service Company, Inc. to conduct their monthly monitoring for permit conditions. The City of Siloam Springs has told each industrial discharger to contact E.S.C. regarding temperature reporting and pH measurements. **A letter of violation will be sent to each industrial user regarding temperature and pH reporting.**

If you have questions regarding this matter feel free to contact this office.

Sincerely,


Trevor L. Bowman, P.E.
Water/Wastewater Director 
(479) 238-0927
tbowman@siloamsprings.com

cc: Peggy Woody, City Clerk
David Cameron, City Administrator
Tom Myers, Wastewater Superintendent
Jay Williams, City Attorney
Parthy Evans, Stinson, Morrison, Hecker

Tom Myers

From: rsixkiller@simfoods.com

Sent: Tuesday, May 13, 2008 12:07 PM

To: tmyers@siloamsprings.com; jearney@simfoods.com

Subject: PH CALB. FORM PER YOUR LAST VISIT

ON YOUR LAST VISIT YOU MENTIONED A OUTLINE ON HOW YOU WANTED US TO DO THE PH CALIBRATION , RECORDING ETC. CAN YOU FORWARD THAT TO EITHER MYSELF OR TO JOE AS TO WHAT YOU HAD IN MIND.

Tom Myers

From: Tom Myers [tmyers@siloamsprings.com]

Sent: Friday, May 16, 2008 2:46 PM

To: Joe; rsixkiller@simfoods.com

Subject: Example of pH spread sheet usage

Richard,

Here is an example how we fill out our pH spread sheet that I sent you.

Tom

pH

INSTRUMENT: ORION 720 A

METHOD: EPA 50.2 ELECTRODE METHOD

Date Sample Collected	Time Sample Collected	Sample Collected By	Date Sample Analysed	Time Sample Analysed	Sample Analysed By	Sample Description	Sample Temperature	pH Reading		Reported pH S.U.	% Slope	Sample Validated By	
								Reading 1	Reading 2				
4/22/08	-	JUH	4/22/08	0932	JUH	7.0	21.6	7.00			97.9		
	-	JUH		0933		4.0	21.6	4.00					
	-	JUH		0934		6.86	21.3	6.88					
	0944	JUH		0948		-	21.1	6.31	6.32	6.31			
	0945	JUH		0955		-	21.4	6.04	6.57				
0958	JUH	1000	-	22.6	6.57								
4/29/08	-	JUH	4/29/08	0946	JUH	7.0	18.8	7.00			98.1		
	-	JUH		0947		4.0	18.7	4.00					
	-	JUH		0948		6.96	18.7	6.87					
	0952	JUH		0955		-	21.6	6.44	6.46	6.44			
	0993	JUH		0999		-	21.8	6.00					
1002	JUH	1004	-	22.8	6.51								
5/6/08	-	JUH	5/6/08	1040	JUH	7.0	20.5	7.00			97.2		
	-	JUH		1041		4.0	20.4	4.00					
	-	JUH		1042		6.86	20.3	6.88					
	1046	JUH		1049		-	21.1	6.28	6.29	6.28			
	1047	JUH		1054		-	21.3	5.94					
1055	JUH	1057	-	23.8	6.56								
5/13/08	-	JUH	5/13/08	1010	JUH	7.0	20.4	7.00			97.8		
	-	JUH		1011		4.0	20.3	4.00					
	-	JUH		1012		6.86	20.3	6.88					
	1027	JUH		1033		-	21.6	6.18	6.20	6.18			
	1028	JUH		1039		-	21.8	5.83					
1042	JUH	1049	-	23.4	6.58								