

June 22, 2011

James Sanders, Mayor City of Blytheville P.O. Box 1784 Blytheville, AR 72315

RE:	Blytheville	WWTP –	West –	Compliance	and SSO	Inspections

AFIN: 47-00544 NPDES Permit No.: AR0022560

Dear Mr. Sanders:

On May 23, 25, and 26, 2011, fellow inspector Michael Greenway and I performed a routine compliance inspection and sanitary sewer overflow 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 thereunder. This inspection revealed the following violations:

Compliance Inspection:

- A calibration check revealed that the effluent flow meter was underreporting flow by >25%. This violates Part II Section C. Item 2. of the permit. Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to insure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated and maintained to insure the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than +/-10% from true discharge rates throughout the range of expected discharge volumes and shall be installed at the monitoring point of the discharge.
- 2. At the time of the inspection the following Operation and Maintenance Items were noted:
 - a. One of the three clarifiers was out of service.
 - b. One of the clarifier curtains was down.
 - c. The polishing pond curtain was down.

These items violate Part II Section B. Item 1.a. of the permit. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and

maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

- **3.** The QA/QC control charts in the laboratory were incorrect. These charts should be setup with Warning Limits and Control Limits for use in evaluating the results of laboratory duplicates and spikes.
- 4. The fecal coliform incubator/water bath temperature was observed to be below the required temperature of 44.5 (+/-0.2) °C on at least two occasions during the inspection. It appears this problem was corrected by moving the incubator to different location where it was more protected from the flow of cold air from the air conditioner; however multiple checks should be performed to insure the required temperature is consistently maintained.
- 5. The composite samples collected for the analysis of ammonia nitrogen (NH₃-N) were not being properly preserved. Following the collection of the final aliquot, samples should immediately be preserved with sulfuric acid (H₂SO₄) and stored at less than 6 °C until analyzed. Currently, collection of the samples is completed by early afternoon but they are not preserved with sulfuric acid. They are sitting unpreserved until they are analyzed the following day.
- 6. The sludge storage lagoon(s) were not being properly operated and maintained. The levees and other dry portions of these lagoons should be mowed regularly to prevent the growth of woody vegetation and discourage burrowing animals which can weaken the integrity of the levees. Additionally, the current excessive growth of vegetation prevents visual inspection for the detection of leaks, seeps, and other illicit discharges. As discussed previously, you may wish to permanently close out portions of the sludge storage lagoons to reduce the area that must be maintained. Please contact the Permits Branch for specific requirements related to closure of portions of these lagoons.

SSO Inspection:

You should continue working to comply with the current Consent Administrative Order (CAO) requiring you to evaluate, repair and upgrade the collection system including the installation of emergency backups and remote monitoring.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Branch of this Department. This response should be mailed to the address below and should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response is due by **July 2, 2011**.

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

James Sanders, Blytheville WWTP - West June 22, 2011 Page 3

If I can be of any assistance, please contact me at walker@adeq.state.ar.us or 870-935-7221 ext.-12.

Sincerely, Brest 2 Walter

Brent L. Walker District 3 Field Inspector Water Division

cc: Water Division Enforcement Branch Water Division Permits Branch

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Section B: Facility Data																						
Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)Entry Time/Date 1400 5/23/2011 0830 5/25/2011Blytheville WWTP - West0830 5/25/2011										Permit Effective Date 12/1/2005												
4951 NCR 635 Exit Time/Date Permit Expiration Date Blytheville, AR 1600 5/23/2011 11/30/2010 Mississippi Co. 1555 5/25/2011 11/30/2010									Date													
Jan	Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Other Facility Data James Yankee/Pretreatment Coordinator/870-763-4961 Tamara Lopolito/Lab Technician Other Facility Data																					
	meth Ellis/Waste Water Superinte															{						
Jan	ne, Address of Responsible Official/ nes Sanders/Mayor/870-763-3602	I Itle/	Phone a	nd Fax	Numi	ber						Con	tacted									
P. O	y of Blytheville 9. Box 1784										Yes		No	N								
Bly	theville, AR 72315										Tes		NOL									
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s	Permit	U	Flow	Measu	ireme	nt			U	Op	erations &	Maiı	ntenar	nce		U	Sampling					
S	Records/Reports	U	Self-	Monito	ring l	Progr	am		Ν	Sh	ıdge Handl	ling/D	ispos	al		Ν	Pollution Prevention					
U	Facility Site Review	Ν	Com	pliance	Sche	dules			N	Pr	etreatment					Ν	Multimedia					
М	Effluent/Receiving Waters	U		ratory		6 5 1		10	N		orm Water			• 6		N	Oth	er:				
		Se	ction L	: Sum	mary	of Fu	lding	s/Cor	nment	ts (At	tach additi	onals	sheets	if neo	essar	y)						
IVI	ultiple violations were noted.																					
See the attached letter and inspection report for description of findings and additional information.																						
Na	me(s) and Signature(s) of Inspector(s)							e/Telep								Dat	e				
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Sig	nature of Reviewer		_	_		Ag	ency/	Offic	e/Phor	ne and	Fax Numb	ers					Dat	te	_	_		

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	Øy 🛛 n 🗆 na 🗆 ne
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	Øy 🗅n 🗇na 🗇ne
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS:	
 TREATMENT UNITS PROPERLY OPERATED: <u>One clarifier out of service; clarifier curtain down, polishing pond curtain d</u> 	
2. TREATMENT UNITS PROPERLY MAINTAINED: Clarifier weirs in need of cleaning	
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: Sludge storage lagoons are overgrown with vegetation.	
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: None	
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	OS OM 🗹 U ONA ONE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	
7 SPARE RARTS AND SUDDIES INVENTORY MAINTAINED.	
7. SPARE PARTS AND SUPPLIES INVENTORT MAINTAINED.	
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SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	
DETAILS:	·
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	Øy 🛛 n 🗆 na 🖾 ne
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	
a. SAMPLES REFRIGERATED DURING COMPOSITING:	
b. PROPER PRESERVATION TECHNIQUES USED: Not properly preserving NH3-N	
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 28" rectangula	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	
4. CALIBRATION FREQUENCY ADEQUATE:	
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES: Hydraulically overloa	
9. HEAD MEASURED AT PROPER LOCATION:	
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	
SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT: <u>Fecal incubator too cool</u>	
QUALITY CONTROL PROCEDURES ADEQUATE: <u>Control charts are incorrect</u>	
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED >10% OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	🗹 Y 🗆 N 🗆 NA 🗆 NE
a. LAB NAME: <u>ETC</u>	
b. LAB ADDRESS: <u>Memphis, TN</u>	
c. PARAMETERS PERFORMED: Biomonitoring	
8. BIOMONITORING PROCEDURES ADEQUATE:	
a. PROPER ORGANISMS USED:	
b. PROPER DILUTION SERIES FOLLOWED:	
c. PROPER TEST METHODS AND DURATION:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	DY DN ØNA DNE

ADEQ Water NPDES Inspection

AFIN: 47-00544

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3. SAMPLES PRESERVED:
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:
7. SAMPLE SPLIT WITH PERMITTEE:
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:
SECTION J: STORM WATER POLLUTION PREVENTION PLAN
STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS
DETAILS: Facility has a No Exposure Exclusion ARR00C337
1. SWPPP UPDATED AS NEEDED: DATE OF LAST UPDATE:
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:
3. POLLUTION PREVENTION TEAM IDENTIFIED:
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:
5. LIST OF POTENTIAL POLLUTANT SOURCES:
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:
8. LIST OF STRUCTURAL BMPS:
9. LIST OF NON-STRUCTURAL BMPS:
10. BMPS PROPERLY OPERATED AND MAINTAINED:
11. INSPECTIONS CONDUCTED AS REQUIRED:

ADEQ Water NPDES Inspection

AFIN: 47-00544

Permit #: AR0022560

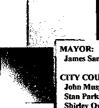
FLOW CALCULATION SHEET												
Date: 5/23/2011 Time: 1439												
Head in Inches:N/A*Feet:N/A*19.75" Total Head												
Type & Size of Primary Flow Measurement Device:												
28" Rectangular weir without end contractions												
Name & Model of Secondary Flow Measurement Device: Polysonic Transducer												
Date of last	Calibration of Sec	ondary Flow D	evice:	7/13/2	2010							
Recorded Flow at Date & Time Listed Above: 1356 GPM (Facility Flow Meter)												
	Flow at Date & Tim			5 GPN		(Facility Flow Chart)*						
(Flow is calculat	ed using flow charts in: <u>IS</u>	<u> </u>	IOW Measur	<u>ement</u> ⊢	andbook-5 -E	zaition)						
% Error =	Recorded Value		d Value	- X 10	00							
	Calcul	ated Value										
% Error =	1356	- 181	5	X 10								
% E1101 =		1815										
	-459											
% Error =	1815	X 100										
	0.052	X 100										
% Error =	-0.253	X 100										
% Error =	-25.3	%										
Comments:	Under reporting	n flow by 525°	6									
			<u> </u>									

ADEQ Water NPDES Inspection	AFIN	47-00544					
	DN	IR Calculat	tion Che	ck			
Reporting Period: From	<u>11</u> Year	1 Month	1 Day	_ To	11 Year	1 Month	<u>30</u> Day
Parameter Checked:	DO	_					
						itration ithly	
			Mo. A	vg	mg/l		
				Min			
Reported Value:				11.4			
Calculated Value:				11.4			
Permit Value:			7 (M	inimu	ım)		

If calculated value does not equal reported value, explain: <u>Equal</u>

ADEQ Water NPDES Inspection	AFIN	l: 47-00544	Permit #: AR0022560							
	DN	AR Calculat	tion Che	ck						
Reporting Period: From	11	4	1	То	11	4	30			
	Year	Month	Day		Year	Month	Day			
Parameter Checked:	рН	_								
					ntration nthly					
		Mo. Avg mg/l			•					
Reported Value:			6.9			7.9				
Calculated Value:				6.9		7.9)			
Permit Value:				6		9				

If calculated value does not equal reported value, explain: <u>Equal</u>



1

CITY COUNCIL: John Musgraves Stan Parks Shirley Overman Monte Hodges Mylas Jeffers

Missy Langstor ATTORNEY: Mike Bearden

PUBLIC UTILITIES DIRECTOR: Marvin Crawford

SUPERINTENDENT: Kenneth Ellis

Blytheville Wastewater Dept.

P.O. Box 1784 Blytheville, AR 72316-1784

> Phone:(870) 763-4961 Fax: (870) 763-8541



April 3, 2013

ADEQ

WATER DIVISION-INSPECTION BRANCH 5301 NORTHSHORE DRIVE NORTH LITLE ROCK, AR. 72118-5317

RE: INSPECTION RESPONSE OF THE BLYTHEVILLE WASTEWATER TREATMENT PLANTS.

COMPLIANCE INSPECTIONS REPLY:

- West(AR0022560)WWTP: The extensive accumulation of solids in the clarifiers was due to problems with the return activated sludge system. Blockages in the return lines located at the bottom of the clarifiers became blocked and caused sludge to rise in the clarifiers.(pop-ups) These lines were blown out to remove and un-clog the sludge lines and will be implemented on a regular basis.
- 2. South(AR0022578)WWTP: The refrigeration unit on our composite sampler froze up due to a faulty fan in the unit. This has been replaced and is working properly.

- 4.A. The water bath incubator for fecal coliform testing will be closely monitored to insure a constant temperature of 44.5 C. If it will not maintain the required temperature we will replace the unit.
 - B. The thermometers in the lab and automated samplers are calibrated quarterly. This was due to the lab tech being out because of surgery. The operators will now calibrate the thermometers to prevent this from happening.
 - C. The flowcharts will be changed to measure the flow in 1/8 inch intervals. We will also install a stilling well or site glass to measure the flow more Accurately to insure readings are within +/- 10%.
 - D. Letter attached from SSR's Daniel Bowling, PE

NOTIFICATION ALARMS

AR0022560 820 pump station shop pump station 21st ST pump station Division pump station

3

AR0022578 McHaney ST. pump station Lake ST. pump station County RD. pump station

AR0022586 Walker Park lift station Lockard ST. pump station Walmart pump station

Line 4 part D

Consulting engineer is working with the ADEQ for proper procedure on closure and sludge storage lagoons maintenance and isolation of that lagoon. Contact person ADEQ.

SSO INSPECTION

Grease at 820 pump station will be removed and properly disposed of at landfill. We will continue to monitor this through pretreatment.

WALMART LIFT STATION

We can only remove this grease at certain times of the year due to getting on farmers property. We will do this in April 2013 and monitor this through pretreatment.

If you need more information please call me at (870)763-4961.

ſ Sincerely,

Kenneth Ellis Superintendent



2650 Thousand Oaks Boulevard Suite 3200 Memphis, TN 38118 (901) 683-3900 FAX (901) 683-3990 www.ssr-inc.com

March 25, 2013

Arkansas Department of Environmental Quality Attn: Brent Walker 2212 Fowler Ave. Suite R Jonesboro, AR 72401-6115

Brent,

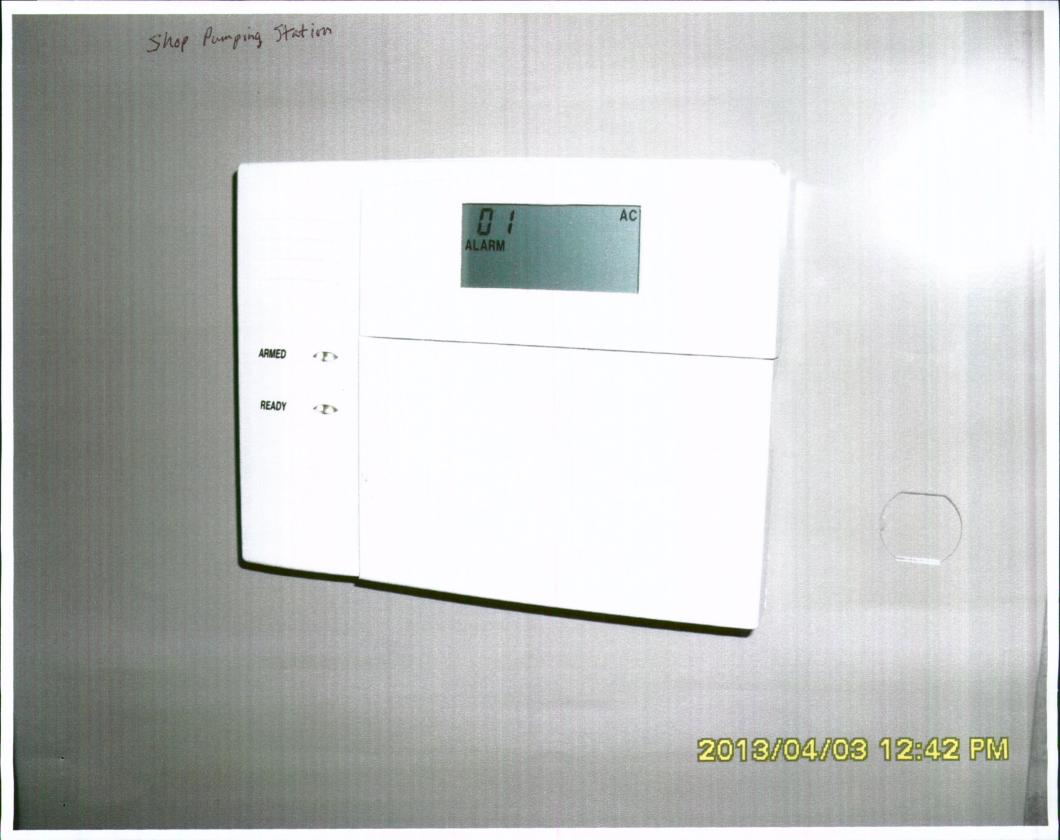
I have provided this lagoon closure plan correspondence summary at the request of the City of Blytheville Sanitary Sewer Department. The City of Blytheville and Smith Seckman Reid (SSR) are still in the process of negotiating a lagoon closure plan with ADEQ. This lagoon closure plan was submitted to ADEQ on October 21st, 2011. It is essentially an abandon-in-place plan, with soil tests showing that the soil in place is perfectly suitable for land application and does not warrant removal. This soil removal would be of significant cost to the City of Blytheville. Stephen Hogan with the ADEQ Water Division was the engineer assigned to review the plan. The initial response from ADEQ was received by SSR on March 26, 2012. Subsequent correspondence between SSR and ADEQ include a response e-mail from SSR dated March 27, 2012; a response e-mail from ADEQ dated June 7, 2012; and finally a response e-mail from SSR dated November 20, 2012. SSR will contact ADEQ again to determine the current status of the lagoon closure plan. The City of Blytheville has essentially waited to address the active lagoons until a decision is made related to the inactive lagoon cells. The active cells are oversized for their use, and will likely be consolidated eventually. Soils tests were done performed on the outer limits of these active cells as well.

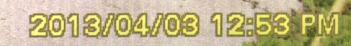
Sincerely,

Duniel Dowling

Daniel Bowling, PE







West Plant

-

STAN II





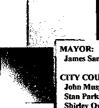
Blytheville Wastewater Dept. P.O. Box 1784 Blytheville, AR 723/6





REFURN RECEIPT REQUESTED

ADEQ WATER Division - Inspection Branch 5301 Northshove Drive North Little Rock, AR 72118-5317



1

CITY COUNCIL: John Musgraves Stan Parks Shirley Overman Monte Hodges Mylas Jeffers

Missy Langstor ATTORNEY: Mike Bearden

PUBLIC UTILITIES DIRECTOR: Marvin Crawford

SUPERINTENDENT: Kenneth Ellis

Blytheville Wastewater Dept.

P.O. Box 1784 Blytheville, AR 72316-1784

> Phone:(870) 763-4961 Fax: (870) 763-8541



April 3, 2013

ADEQ

WATER DIVISION-INSPECTION BRANCH 5301 NORTHSHORE DRIVE NORTH LITLE ROCK, AR. 72118-5317

RE: INSPECTION RESPONSE OF THE BLYTHEVILLE WASTEWATER TREATMENT PLANTS.

COMPLIANCE INSPECTIONS REPLY:

- West(AR0022560)WWTP: The extensive accumulation of solids in the clarifiers was due to problems with the return activated sludge system. Blockages in the return lines located at the bottom of the clarifiers became blocked and caused sludge to rise in the clarifiers.(pop-ups) These lines were blown out to remove and un-clog the sludge lines and will be implemented on a regular basis.
- 2. South(AR0022578)WWTP: The refrigeration unit on our composite sampler froze up due to a faulty fan in the unit. This has been replaced and is working properly.

- 4.A. The water bath incubator for fecal coliform testing will be closely monitored to insure a constant temperature of 44.5 C. If it will not maintain the required temperature we will replace the unit.
 - B. The thermometers in the lab and automated samplers are calibrated quarterly. This was due to the lab tech being out because of surgery. The operators will now calibrate the thermometers to prevent this from happening.
 - C. The flowcharts will be changed to measure the flow in 1/8 inch intervals. We will also install a stilling well or site glass to measure the flow more Accurately to insure readings are within +/- 10%.
 - D. Letter attached from SSR's Daniel Bowling, PE

NOTIFICATION ALARMS

AR0022560 820 pump station shop pump station 21st ST pump station Division pump station

3

AR0022578 McHaney ST. pump station Lake ST. pump station County RD. pump station

AR0022586 Walker Park lift station Lockard ST. pump station Walmart pump station

Line 4 part D

Consulting engineer is working with the ADEQ for proper procedure on closure and sludge storage lagoons maintenance and isolation of that lagoon. Contact person ADEQ.

SSO INSPECTION

Grease at 820 pump station will be removed and properly disposed of at landfill. We will continue to monitor this through pretreatment.

WALMART LIFT STATION

We can only remove this grease at certain times of the year due to getting on farmers property. We will do this in April 2013 and monitor this through pretreatment.

If you need more information please call me at (870)763-4961.

ſ Sincerely,

Kenneth Ellis Superintendent



2650 Thousand Oaks Boulevard Suite 3200 Memphis, TN 38118 (901) 683-3900 FAX (901) 683-3990 www.ssr-inc.com

March 25, 2013

Arkansas Department of Environmental Quality Attn: Brent Walker 2212 Fowler Ave. Suite R Jonesboro, AR 72401-6115

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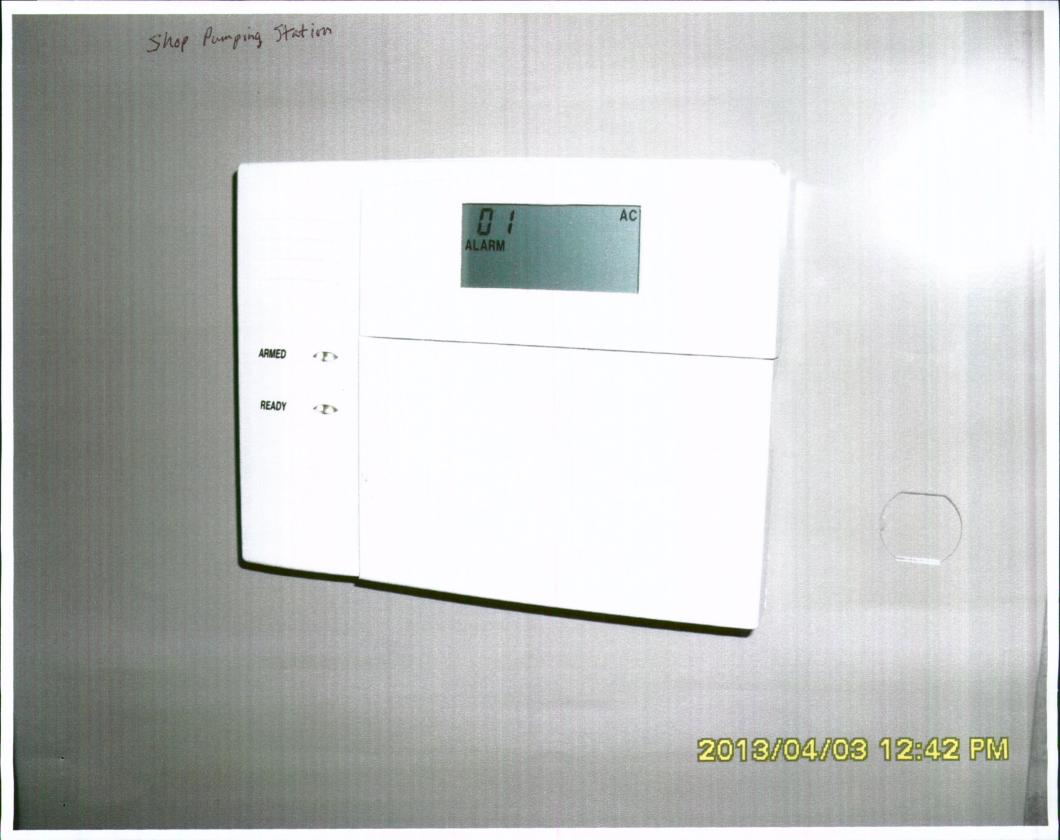
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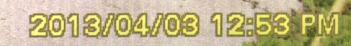
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West Plant

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