## Gage, Hannah

From: Gilliam, Allen

**Sent:** Thursday, June 30, 2016 10:00 AM

To: 'Mark Moore'

Cc: Gage, Hannah; Leamons, Bryan; 'pocawater@suddenlinkmail.com'

**Subject:** AR0034835\_ESNA ARP001048 June 2016 semi annual Pretreatment report\_20160630

**Attachments:** [Untitled].pdf

#### Mark,

ESNA's June 2016 semi-annual Pretreatment report was electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically in compliance with the Metal Finishing standards in 40 CFR 433.14 using the combined wastestream formula in 40 CFR 403.6.

Thank you for submitting the calculations for the alternative concentration limits taking into account your dilution streams.

The suggestion of connecting the dilution stream(s) to the sanitary line instead of the regulated wastewater line is not required. It was only suggested to remove any doubts or confusion about future dilution factors.

Thank you for your timely report.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: William Daniel, City of Pocahontas Plant Manager

E/NPDES/NPDES/Pretreatment/Reports

From: Mark Moore [mailto:mmoore@esnaproducts.com]

Sent: Wednesday, June 29, 2016 12:36 PM

To: Gilliam, Allen

Subject: Semi annual report from ESNA

Mr. Gilliam,

Steve and I went through the report and compared it to the reports in the past. We had made an error on location of a decimal point in our calculations. We move the sanitary out of the calculation also. We will also have the noncontact water moved by the end of the month as you suggested. Thank you for all the help. Sorry that we made the mistake and took up your time.

Thank you, Mark Moore ESNA

# SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40 CFR 433

Use of this form is not an ADEQ requirement, but satisfies the reporting requirement	ents in 40 CFR 403.12(e) Attn: Water Div/NPDES Pretreatmen
(I) IDENTIFYING INFORMATION and NPDES Pretreatmen	t Tracking#
A. LEGAL NAME & MAILING ADDRESS  ESNA 611 Country Club Road Pocahontas, Ark 72455	B. FACILITY & LOCATION ADDRESS  ESNA 611 Country Club Road Pocahontas, Ark 72455
C. FACILITY CONTACT: Mark Moore TELEPHONE NUMBER:	870-892-4789 e-mail: mmoore@esnaproducts.com
(2) REPORTING PERIOD-FISCAL YEAR From to	(Both Semi-Annual Reports must cover Fiscal Year)
A. MONTHS WHICH REPORTS ARE DUE _June & December	B. PERIOD COVERED BY THIS REPORT FROM: January - 2016 TO: June - 2015
(3) DESCRIPTION OF OPERATION	10. June 2013
A. REGULATED PROCESSES  CORE PROCESS(ES)  CHECK EACH APPLICABLE BLOCK  G Electroplating G Electroless Plating G Anodizing X Coating (conversion) G Chemical Etching and Milling G Printed Circuit Board Manufacture	B. CHANGES:  SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.
ANCILLARY PROCESS(ES)*  LIST BELOW EACH PROCESS USED IN THE FACILITY Passivate Rinse Tank	
C. Number of Regular Employees at this Facility75	D. [Reserved]

#### (4) FLOW MEASUREMENT

### INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge*
Regulated (Core &	2514	4641	Continuous
Regulated (Cyanide)	N/A	Ň/A	N/A
'403.6(e) Unregulated*	N/A	N/A	N/A
'403.6(e) Dilute	121,4	217	Continuous
Cooling Water	1934	3571	Continuous
Sanitary	724	1004	Continuous
Total Flow to POTW	5174	9220	******

\*If batch discharged please list the period of timeof each batch discharge (300 gallons/day; 500 gallons/week, 2,000 gallons/3 months, etc). Do not normalize over that period for the average flow.

"Unregulated" has a precise legal meaning; see 40CFR403.6(e).

) MEASURE		

A. TYPE OF TREATMENT SYSTEM

B. COMMENTS ON TREATMENT SYSTEM

CHECK EACH APPLICABLE BLOCK

G Neutralization

G Chemical Precipitation and Sedimentation

**G** Chromium Reduction

G Cyanide Destruction

G Other

G None

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSESCORE & ANCILLARY--(AFTER TREATMENT, IF APPLICABLE). ATTACH THE LAB ANALYSIS WHICH SHOWS A MAXIMUM; TABULATE ALL THE ANALYTICAL DATA COLLECTED DURING THE REPORT PERIOD IN THE SPACE PROVIDED BELOW. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

40 CFR 433.15 Pollutant(mg/l) limits	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	тто*
Max for I day	.371	1.491	1.819	.371	2.142	.231	1,404	.646	1.997
Monthly Avg	.140	.920	1.114	.231	1.281	.129	.796	.350	
Max Measured	<.004	.30	.22	<.04	.20	<.007	.30	<.01	N/A
Avg Measured**	<.004	.30	.22	<.04	.20	<.007	.30	<.01	N/A

Sample Location Pretreatment system Effluent

Sample Type (Grab\* or Composite) Grab/Composite

If Grab sampled, list # of grabs over what period of time \_\_1 over 24 hours \_\_\_\_ and if composited by facility or the certified lab X.

Number of Samples and Frequency Collected 1 per Semi-Annual

40CFR136 Preservation and Analytical Methods Use: X Yes G No (include complete Chain of Custody)

\*If a TOMP has been submitted and approved by ADEO place N/A.

Indicate Combined Wastestream Factor (include calculations) if dilution streams commingle with regulated process wastestream: .538

<sup>\*\*</sup>A value here is the average of all samples taken during one (1) calendar month regardless of number of samples taken. If only one (1) sample is taken it must meet the monthly average limitation.

) CERTIFICATION (ONLY IF	A TOMP HAS BEEN SUBMITTED/APPROVED BY ADEQ
	THE THE PERSON NAMED AND THE PARTY OF THE PA
B. CHECK ONE: G '433.11(	(e) TOXIC ORGANIC ANALYSIS ATTACHED G '433.12(a) TTO CERTIFICATION
prefreatment standa: dumping of concentr compliance report. I	of the person or persons directly responsible for managing compliance with the rd for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no rated toxic organics into the wastewaters has occurred since filing of the last semi-annual I further certify that this facility is implementing the toxic organic management plan as Department of Environmental Quality.
	David Merwitz
	(Corporate Officer or authorized representative signature)
1	Date of Signature
) POLLUTION PREVENTION	FACT OF 1990 [42:44.8] CLISTOTEF sent to be described to the property of the control of the cont
	ANALYS DANGER AND ANALYS DESIGNATION OF THE STATE OF THE
*6602 [42 U.S.C. 13101] Findings and Polic	cy para (b) Policy—The Congress hereby declares it to be the national volicy of the United States that national should be provened as reduced at the course
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40 CFR 433 SEMI-ANNUAL REPORT CON'D FACILIT	Y NAME:MacLean ESNA
(9) SEMI-ANNUAL/PERIODIC REPORT CERTIFICATION STAT	EMENT REQUIRED UNDER 40 CFR 403,12(1)
I certify under penalty of law that I have personally examined and all attachments were prepared under my direction or sugnet that qualified personnel properly gather and evaluate the informations who manage the system, or those persons directly resubmitted is, to the best of my knowledge and belief, true, according the possion penalties for submitting false information, including the possion.	pervision in accordance with a system designed to assure permation submitted. Based on my inquiry of the person or sponsible for gathering the information, the information curate, and complete. I am aware that there are significant
David Merwitz NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTAT	IVE SIGNATURE
General Manager OFFICIAL TITLE	6 /20/2016 DATE SIGNED

Water from City				Total F	rocess Flow	to City		
Year				Year				
2016 Days	G	al. Avg	Flow Total	2	016 Days	G	al. Avg	Flow Total
Dec	30	3447	103400	Dec		39	8216	320432
Jan	32	4544	145400	Jan		31	6609	204873
Feb	29	6576	190700	Feb		32	512	16395
Mar	29	3207	93000	Mar		28	3689	103294
Apr	33	1527	50400	Apr		30	4483	134482
May	30	3173	95200	May		30	3188	95641
	Aı	vg Flow	3746		Avg. Us	ed	4450	
	M	ax Flow	6576		Max Us	ed	8216	

These are monthly readings from water bills. Water bills are located in Accounting department. Flow total column is only one that needs to be populated, rest will calculate.

These are monthly readings from flow meter at Weir (oil & water separation unit) located at Northeast corner of property. Reading to be taken first working day on or near the 8th day of each month.

- 1. Update months depending on 1st half or 2r
- 2. Update days on calendar basis
- 3. Get water bills as outlined in call out
- 4. Flow meter reading to be taken and record: Maintenance Dept.

# Avg Flow for 1-1-16 to 6-30-16

1547 GP	'D Well Water	1547 GPD	Hydraulic Pres	s non-contact cooling water -	non-regulated dilution	
		387 GPD	Lepel Induction	n Heater non-contact cooling v	vater - non-regulated dilution	
		1523 GPD	Passivate rinse	e tank - regulated		Water used from City
3021 GP	D City Water	968 GPD	Rust Removal	rinse tank - regulated	1N	3746 GPD OUT TO CITY
		23 GPD	Product Debur	ring - regulated	2514 GPD Aeration Mixing Basi	n 4,450 GPD
		115 GPD	Mop water - dil	lute		
		1 GPD	Salt Spray blov	w down - dilute	Total Regulated =	2514 GPD
		3.1 GPD	Lab - diłute			
		1 GPD	Air compressor	r blow down - dilute	Total Dilute Flow =	2055 GPD
		1 GPD	Boiler blow dov	wn - dilute		
		Regulate		g. Flow 2514		
		Dilute		121.4		
		Cooling V	Vater	1934		
		Sanitary		725		
	Total Flow at San	nple Point to POT\	N	5174		

# Max Flow for 1-1-16 to 6-30-16

2857 GPD Well Water	er 2857 GPD	Hydraulic Pres	s non-contact cooling water - r	non-regulated dilution	
	715 GPD	Lepel Induction	n Heater non-contact cooling w	/ater - non-regulated dilution	
	2812 GPD	Passivate rinse	e tank - regulated		Water used from City
5572 GPD City Water	er 1787 GPD	Rust Removal	rinse tank - regulated	IN	6576 GPD OUT TO CITY
	43 GPD	Product Debur	ring - regulated	4641 GPD Aeration Mixing Bas	sin 8,216 GPD
	213 GPD	Mop water - dil	ute		
	1 GPD	Salt Spray blov	v down - dilute	Total Regulated	= 4641 GPD
	1.0 GPD	Lab - dilute			
	1 GPD	Air compressor	r blow down - dilute	Total Dilute Flow	= 3788 GPD
	1 GPD	Boiler blow dov	wn - dilute		
	Regulated		g. Flow 4641		
	Dilute		217		
	Cooling V	/ater	3571		
	Sanitary		1004		
Total Flow a	t Sample Point to POTV	v	9220		

# Waste Stream Factor

Total flow at Sample Point to City = Total Regulated + Total Dilute Flow

Combined wastestream factor is total regulated divided by total flow at sample point

Flow Total at				Flow Total at	Waste Strea	m	
Sample Point	Minus	Diluted Flow	Divided by	Point	Equals	Factor	
445	0	20	)55		4450		0.538

PSES for All Plants Except Job Sho	ps and Independent Printed Circ	uit Board Manufacturers
Pollutant or pollutant property	Maximum for any 1 day	Monthly average shall not exceed
	Milligrams per liter (mg/l)	
Cadmium (T)	0.69	0.26
Chromium (T)	2.77	1.71
Copper (T)	3.38	2.07
Lead (T)	0.69	0.43
Nickel (T)	3.98	2.38
Silver (T)	0.43	0.24
Zinc (T)	2.61	1.48
Cyanide (T)	1.2	0.65
тто	2.13	

Wastestream factor

0.538

Pollutant or pollutant property	Maximum for any 1 day	Monthly average shall not exceed
	Milligrams per liter (mg/l)	
Cadmium (T)	0.371	0.140
Chromium (T)	1.491	0.920
Copper (T)	1.819	1.114
Lead (T)	0.371	0.231
Nickel (T)	2.142	1.281
Silver (T)	0.231	0.129
Zinc (T)	1.404	0.796
Cyanide (T)	0.646	0.350
тто	1.146	

FORESCHOOL CONTRACTOR	Totalizer		Monitoring				
Date	Reading	Days	Avg per day				Reading
12/1/2015	0			Reset			· · · · · · · · · · · · · · · · · · ·
12/16/2015	138647	16	8665				
12/28/2015	215025	28	7679				
1/4/2016	274071	35	7831				•
1/4/2016	0			Reset			
1/5/2016	10793	1	10793				
1/6/2016	23029	2	11515				
1/7/2016	36751	3	12250				
1/8/2016	46361	4	11590	Water	Meter	Read	
1/8/2016	0			Reset .		11000	
1/11/2016	17733	3	5911				
1/13/2016	30124	5	6025				
1/14/2016	35487	6	5915				
1/18/2016	61233	10	6123			-	
1/29/2016	133498	21	6357				
2/5/2016	192481	28	6874				,
2/8/2016	204873	31	6609				
2/8/2016	0			Reset			
2/15/2016	34820	7	4974				
2/19/2016	59941	11	5449				
2/26/2016	91580	18	5088				
3/4/2016	121957	25	4878				
3/11/2016	163975	32	5124				
3/11/2016	0			Reset			
3/18/2016	20468	7	2924				
3/25/2016	Holiday						
4/1/2016	78509	21	3739				
4/8/2016	103294	28	3689				
4/8/2016	0			Reset			
4/18/2016	82064	10	8206				
4/22/2016	93631	14	6688				-
5/9/2016	134482	30	4483				
5/9/2016	0			Reset			
5/16/2016	9168	7	1310				•
5/23/2016	37245	14	2660				
5/31/2016	63704	21	3034				
6/8/2016	95641	30	3188				
6/8/2016	0			Reset			

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May 23, 2016 Control No. 202360 Page 1 of 5

**ESNA** 

ATTN: Mr. Mark Moore 611 Country Club Road Pocahontas, AR 72455

This report contains the analytical results and supporting information for samples submitted on May 20, 2016. Attached please find a copy of the Chain of Custody and/or other documents received. Note that any remaining sample will be discarded two weeks from the original report date unless other arrangements are made.

This report is intended for the sole use of the client listed above. Assessment of the data requires access to the entire document.

This report has been reviewed by the Chief Operating Officer or a qualified designee.

John Overbey | Chief Operating Officer

This document has been distributed to the following:

PDF cc: ESNA

ATTN: Mr. Mark Moore mmoore@esnaproducts.com



#### SAMPLE INFORMATION

#### Project Description:

Two (2) water sample(s) received on May 20, 2016 433 Report - ADEQ P.O. No. 30225-00

#### Receipt Details:

A Chain of Custody was provided. The samples were delivered in one (1) ice chest. Ice chest #1 was delivered with shipping documentation.

Each sample container was checked for proper labeling, including date and time sampled. Sample containers were reviewed for proper type, adequate volume, integrity, temperature, preservation, and holding times. Any exceptions are noted below:

#### Sample Identification:

Laboratory ID	Client Sample ID	Sampled Date/Time Notes
202360-1	001	19-May-2016 0500
202360-2	002	19-May-2016 0500

#### Case Narrative:

There were no qualifiers for this data and all samples met quality control criteria.

#### References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).

<sup>&</sup>quot;Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.

<sup>&</sup>quot;Standard Methods for the Examination of Water and Wastewaters", (SM).

<sup>&</sup>quot;American Society for Testing and Materials" (ASTM).

<sup>&</sup>quot;Association of Analytical Chemists" (AOAC).



## **ANALYTICAL RESULTS**

AIC No. 202360-1

Sample Identification: 001 19-May-2016 0500

 
 Analyte
 Result
 RL
 Units
 Qualifier

 Total Cyanide SM 4500-CN C,E 1999
 < 0.01</td>
 0.01
 mg/l Analyzed: 23-May-2016 1037 by 319
 Batch: W56000

AIC No. 202360-2

Sample Identification: 002 19-May-2016 0500

Analyte		Result	RL	Units	Qualifier
Cadmium EPA 200,7	Prep: 20-May-2016 1353 by 317	< 0.004 Analyzed: 20-May-2	0.004 2016 1612 by 317	mg/l Batch: S41169	
Chromium EPA 200.7	Prep: 20-May-2016 1353 by 317	0.30 Analyzed: 20-May-2	0.007 2016 1612 by 317	mg/l Batch: S41169	
Copper EPA 200.7	Prep: 20-May-2016 1353 by 317	0.22 Analyzed: 20-May-2	0.006 2016 1612 by 317	<b>mg/l</b> Batch: S41169	
Lead EPA 200.7	Prep: 20-May-2016 1353 by 317	< 0.04 Analyzed: 20-May-2	0.04 2016 1612 by 317	<b>mg/l</b> Batch: S41169	
Nickel EPA 200.7	Prep: 20-May-2016 1353 by 317	0.20 Analyzed: 20-May-2	0.01 2016 1612 by 317	<b>mg/l</b> Batch: S41169	
Sîlver EPA 200.7	Prep: 20-May-2016 1353 by 317	< 0.007 Analyzed: 20-May-2	0.007 2016 1612 by 317	mg/l Batch: \$41169	
Zinc EPA 200.7	Prep: 20-May-2016 1353 by 317	0.30 Analyzed: 20-May-2	0.002 2016 1612 by 317	mg/l Balch: S41169	



# LABORATORY CONTROL SAMPLE RESULTS

A lv. 4	Spike	%	l foreiten	OBD.	Linain	Datab	Our ways that the Code	A-abad- Dat-	Dil	Ġ1
Analyte Total Cyanide	Amount 0.1 mg/l	98.6	Limits 85.0-115	RPD	Limit	Batch W56000	Preparation Date 23May 15 0742 by 319	Analysis Date 23May16 1036 by 319	Dil	Qual
Cadmium	5 mg/l	95.5	85.0-115			S41169	20May16 1353 by 317	20May16 1545 by 317		
Chromium	0.5 mg/l	91.5	85.0-115			S41169	20May16 1353 by 317	20May16 1545 by 317		
Copper	0.5 mg/l	100	85.0-115			\$41169	20May16 1353 by 317	20May16 1545 by 317		
Lead	5 mg/l	98.0	85.0-115			S41169	20May16 1353 by 317	20May16 1545 by 317		
Nickel	0.5 mg/l	96.4	85.0-115			S41169	20May 16 1353 by 317	20May 16 1545 by 317		
Silver	0.1 mg/l	104	85.0-115			S41169	20May16 1353 by 317	20May16 1545 by 317		
Zinc	0.5 mg/l	94.9	85.0-115			S41169	20May16 1353 by 317	20May16 1545 by 317		

## MATRIX SPIKE SAMPLE RESULTS

Analyte	Spi Sample Am		Y <sub>0</sub>	Limits	Batch	Preparation Date	Analysis Date	Dit	Qual
Total Cyanide		mig/I §	98.2	75.0-125 75.0-125 20.0	W56000 W56000 W56000	23May16 0742 by 319 23May16 0742 by 319	23May16 1039 by 319 23May16 1040 by 319		
Cadmium	202344-2 5 m 202344-2 5 m Relative Percent	1g/t S	97.3	75.0-125 75.0-125 20.0	S41169 S41169 S41169		20May16 1550 by 317 20May16 1554 by 317		
Chromium		mg/l 9	93.8	75.0-125 75.0-125 20.0	S41169 S41169 S41169		20May16 1550 by 317 20May16 1554 by 317		
Соррег		mg/l 1	102	75.0-125 75.0-125 20.0	S41169 S41169 S41169	20May16 1353 by 317 20May16 1353 by 317	20May16 1550 by 317 20May16 1554 by 317		
Lead	202344-2 5 m 202344-2 5 m Relative Percent	ng/l 9	99.7	75.0-125 75.0-125 20.0	S41169 S41169 S41169		20May16 1550 by 317 20May16 1554 by 317		
Nickel		mg/l 9	98.1	75.0-125 75.0-125 20.0	S41169 S41169 S41169	, ,	20May16 1550 by 317 20May16 1554 by 317		
Silver		mg/l 1	107	75.0-125 75.0-125 20.0	S41169 S41169 S41169	,	20May16 1550 by 317 20May16 1554 by 317		
Zinc		mg/I 9	96.3	75.0-125 75.0-125 20.0	S41169 S41169 S41169		20May16 1550 by 317 20May16 1554 by 317		



# LABORATORY BLANK RESULTS

				QC			
Analyte	Result	₽L.	PQL	Sample	Preparation Date	Analysis Date	Quaf
Total Cyanide	< 0.01 mg/l	0.01	0.01	W56000-1	23May16 0742 by 319	23May16 1034 by 319	• •
Cadmium	< 0.004 mg/l	0.004	0.004	S41169-1	20May16 1353 by 317	20May16 1540 by 317	
Chromium	< 0.007 mg/l	0.007	0.007	S41169-1	20May16 1353 by 317	20May 16 1540 by 317	
Copper	< 0.006 mg/l	0.006	0.006	\$41169-1	20May16 1353 by 317	20May 16 1540 by 317	
Lead	< 0.04 mg/l	0.04	0.04	S41169-1	20May16 1353 by 317	20May16 1540 by 317	
Nickel	< 0.01 mg/l	0.01	0.01	S41169-1	20May16 1353 by 317	20May16 1540 by 317	
Silver	< 0.007 mg/l	0.007	0.007	\$41169-1	20May16 1353 by 317	20May 16 1540 by 317	
Zinc	< 0.002 mg/l	0.002	0:002	S41169-1	20May16 1353 by 317	20May16 1540 by 317	



CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

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# MACLEAN-ESNA

Shipping Order #:

8660----

611 Country Club Roa	611	l Country	Club	Road
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(870) 892-5201

Date: 5/18/2016

i ocanomas, Afkansas 7245:	Pocahontas,	Arkansas	72455
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Ordered	Shipped	ltemNumber	Description	Notes
	2		weir compsite samples to be tested	
			Send test results to	
			Mark Moore mmoore@esnaproducts.com and	
	<del></del> -		Stacy Hoggard shuggard@csnaproducts.com	

American Interplex Corporation
Attn: Sample Receiving
8600 Kanis Road
Little Rock, AR 72204

IT IS UNDERSTOOD AN.	LUNG CONSIGNEE ACCEPTS THE MATERIALS OR ARTICLES LISTED ABOVE SUBJECT TO THE TERMS AND	ì
CONDITIONS SPECIFIED HERE	N AND IN THE RELATED PURCHASE ORDER	

IMPORTANT - Unless notified by consignee of any errors in quantities within 3 days after receipt, our count will be considered as final and conclusive.

All materials or articles shipped for processing, repair or construction work, unless charged to consignee, will be deemed to be held by consignee as upon consignment, and consignee agrees to pay for all articles or materials not satisfactorily accounted for.

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