



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

CERTIFIED MAIL 7007 0710 0003 6239 8489
RETURN RECEIPT REQUESTED

July 28, 2010

In Reply Refer To: CWA-309(a)-10-018

David McNeil, Administrator
Environmental Services Division
City of Tempe, Water Utilities Department
P.O. Box 5002
Tempe, Arizona 85280

Dear Mr. McNeil:

The enclosed Administrative Order sets a 12-month time schedule to resubmit portions of the approved pretreatment program for the City of Tempe.

This Order addresses three main findings determined during recent EPA inspections of three industrial users in Tempe. First, Tempe has not enacted local limits that are technically based to be protective of the Kyrene water reclamation plant. Instead, Tempe applied the local limits developed for a regional treatment plant in Phoenix to all Tempe industrial users including those within the Kyrene sewer service area. Second, the Tempe permit for one of the inspected industrial users advanced incorrect Federal standards. Third, two of the inspected industrial users had sampling records with numerous permit violations. All of these findings were first brought out when EPA issued the industrial user inspection reports. Therefore, any work that Tempe has already done toward resolution of these findings would not have to be redone. The key dates are as follows:

KEY DATES	ADMINISTRATIVE ORDER CWA-309(a)-10-018
09/01/10	1-4. Begin 3 months of added self-monitoring at Kyrene WRP Influent – daily pH, BOD, TSS; weekly TDS, OG, Cu, Hg, Se, Ag Effluent – daily flow, BOD, TSS; weekly TDS, OG, Cu, Hg, Se, Ag
06/30/11	5. Submit revisions to the pretreatment program for ADEQ approval
* * *	6. Adopt local limits within 60 days of obtaining approval 7. Adopt enforcement response plan within 60 days of obtaining ADEQ approval 8. Issue permits for the significant industrial users within the Kyrene sewer service area within 180 days of obtaining ADEQ approval
* * *	9. Self-monitoring reports are due on the 28th day of each month for the samples collected during the previous calendar month.
03/30/11	10. Submit a 70% progress report

The enclosed Finding of Violation and Administrative Order is issued pursuant to Sections 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Clean Water Act ("the Act") as amended 33 U.S.C. Sections 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A). Section 309(a), (b), (d), and (g) of the Act, 33 U.S.C. Section 1319(a), (b), (d), and (g), provides administrative and/or civil judicial relief for failure to comply with the Act. In addition, Section 309(c) of the Act, 33 U.S.C. Section 1319(c), provides criminal sanctions for negligent or knowing violations of the Act, and for knowingly making false statements.

The request for information in the Administrative Order is not subject to review by the Office of Management and Budget under the Paperwork Reduction Act because it is not a "collection of information" within the meaning of 44 U.S.C. Sections 3502(3) and 5 CFR § 1320.5(c) because it is directed to fewer than ten persons. Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is an administrative action against a specific entity [44 U.S.C. § 3518(c)(1)(B) and 5 CFR § 1320.4(a)(2)].

EPA has promulgated regulations to protect the confidentiality of the business information it receives at 40 CFR Part 2, Subpart B. A claim of business confidentiality may be asserted in the manner specified by 40 CFR Section 2.203(b) for all or part of the information requested. EPA will disclose business information covered by such a claim only as authorized under 40 CFR Part 2, Subpart B. If no claim accompanies the business information at the time EPA receives it, EPA may make it available to the public without further notice. The City of Tempe may not withhold from EPA any information on the grounds that it is confidential business information.

If you have any questions regarding this matter, please contact Greg V. Arthur of my staff at (415) 972-3504 or at arthur.greg@epa.gov.

Sincerely,

Original signed by:

Alexis Strauss
Director, Water Division

Enclosure

cc: Mike Golden, Envr Compliance Supervisor, City of Tempe
Daniel Czecholinski, WQ Compliance Assurance Unit, ADEQ

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 9

In the Matter of)	
)	
The City of Tempe)	
Kyrene Water Reclamation Plant and)	FINDING OF VIOLATION
Phoenix 91st Avenue Wastewater Treatment Plant)	
Pretreatment Program)	AND ORDER
)	
Proceedings under Section 308(a) and 309(a)(3),)	Docket No. CWA-309(a)-10-018
(a)(4) and (a)(5)(A) of the Clean Water Act, as)	
amended, 33 U.S.C. Section 1318(a) and)	
1319(a)(3), (a)(4) and (a)(5)(A))	

STATUTORY AUTHORITY

The following Finding of Violation and Order (Docket No. CWA-309(a)-10-018) is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency (EPA) pursuant to Sections 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Clean Water Act [33 U.S.C. Sections 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A)] (hereinafter the Act). This authority has been delegated by the Administrator and Regional Administrator of EPA Region 9 to the Director of the Water Division of EPA Region 9.

FINDING OF VIOLATION

The Director of the Water Division of EPA Region 9 finds that the City of Tempe is in violation of the permit conditions in the National Pollutant Discharge Elimination System (NPDES) permit issued to the City of Tempe. This Finding is made on the basis of the following facts:

1. The Arizona Department of Environmental Quality (ADEQ) under the authority of Section 402(b) of the Act, as amended [33 U.S.C. Section 1342(b)], issued NPDES permit No. AZ0023248 to the City of Tempe on May 14, 2009 to become effective June

19, 2009, and set to expire on June 18, 2014. ADEQ issued a previous version of the NPDES permit to become effective on August 15, 2004 and set to expire on August 15, 2008. The previous version of the NPDES permit was considered to be administratively extended and in effect through the issuance of the current version of the NPDES permit because the City of Tempe submitted its application for renewal in advance of the permit application deadline. The NPDES permit authorizes and has authorized the discharge of treated domestic wastewater from the Kyrene Water Reclamation Plant to a storm drain that is tributary to the Salt River.

2. The Salt River is a navigable water and thus is a water of the United States as defined by the Act and its implementing regulations [33 U.S.C. Section 1362(7); 40 CFR 122.2].
3. Under Section 402(a) of the Act [33 U.S.C. Section 1342(a)], EPA promulgated the NPDES permit regulations in 40 CFR 122 that apply to owners or operators of point sources that discharge pollutants into waters of the United States. The City of Tempe is the owner and operator of the Kyrene Water Reclamation Plant, and thus qualifies as a discharger of pollutants from a point source into waters of the United States.
4. Under Section 307(b) of the Act [33 U.S.C. Section 1317(b)], EPA promulgated the general pretreatment regulations in 40 CFR 403 that apply to Publicly Owned Treatment Works (POTWs) as well as to the industrial users that discharge their non-domestic wastewaters into the POTWs. The Kyrene Water Reclamation Plant and the contributing sewer collection system serving part of the City of Tempe qualify as a POTW within the meaning of Section 307(b) of the Act [33 U.S.C. Section 1317(b)] and the Federal pretreatment regulations in 40 CFR 403.3(o).

5. Part V(B)(3) of the 2009 NPDES permit and Part V(A)(3) of the 2004 NPDES permit require the City of Tempe to perform the pretreatment functions set forth in the general pretreatment regulations in 40 CFR 403. These pretreatment functions include, but are not limited to, the following:
- a. National Prohibitions: The implementation of the general and specific national prohibitions in 40 CFR 403.5(a) and 403.5(b), including the national prohibition against the discharge of wastewaters with pH measurements below 5.0 s.u.;
 - b. Categorical Standards: The implementation in 40 CFR 403.6 of the Federal categorical pretreatment standards defined in 40 CFR 407-471 for certain industrial subcategories, including those in 40 CFR 433 for metal finishing, 40 CFR 469 Subpart A for semiconductor wafer fabrication, and 40 CFR 469 Subpart B for electronic crystal manufacturing;
 - c. Local Limits: The requirements in 40 CFR 403.8(f)(4) and 40 CFR 403.5(c) for a POTW with an approved pretreatment program to implement local limits, in order to ensure renewed and continuing compliance with NPDES permit or sludge use or disposal practices. Implementation involves the following:
 1. Develop and enforce specific limits necessary to protect the treatment works from potential adverse impacts, such as operational interference, worker health and safety risks, the pass-through of pollutants to the receiving waters, and sludge contamination;
 2. To continue to develop these limits as necessary;
 - d. Procedures: The requirements in 40 CFR 403.8(f)(2) that a POTW develop and implement procedures which enable it to ensure compliance with the requirements

of its pretreatment program, and in 40 CFR 403.8(b) that a pretreatment program be administered to ensure industrial user compliance with applicable pretreatment standards and requirements. These procedural requirements necessarily involve at least the following:

1. Notification through an enforceable permit or an equivalent individual control mechanism of the effluent limits based on the general prohibitions in 40 CFR 403.5(a) and 403.5(b), categorical pretreatment standards in 40 CFR 403.6, and specific local limits developed in accordance with 40 CFR 403.5(c), as required in 40 CFR 403.8(f)(1)(iii) and (f)(2)(iii);
 2. Developing an enforcement response plan and enforcing the requirements following the plan, as required in 40 CFR 403.8(b) and (f)(1)(ii).
6. Part V(B)(2) of the 2009 NPDES permit and Part V(A)(2) of the 2004 NPDES permit requires the City of Tempe to enforce the requirements promulgated under Sections 307(b), 307(c), 307(d), and 402(b) of the Clean Water Act with timely, appropriate and effective enforcement actions.
7. EPA conducted inspections and completed compliance evaluations for the Kyrene Water Reclamation Plant, and three significant industrial users within the sewer service area of the City of Tempe. These compliance evaluations resulted in the following:
- a. A walk-through inspection of the Kyrene Water Reclamation Plant on September 24, 2009, and a review of the influent and effluent sampling record from October 2006 through September 2009 for the Kyrene Water Reclamation Plant;
 - b. The May 28, 2010 EPA report of the September 24, 2009 inspection of the Phoenix Coca-Cola Bottling Company at 1850 West Elliot Road in Tempe;

- c. The March 26, 2010 EPA report of the September 22, 2009 inspection of Southwest Metal Finishing at 2002 West Campus in Tempe;
- d. The February 27, 2010 EPA report of the September 24, 2009 inspection of L3 Electro-Optics Systems at 1215 South 52nd Street in Tempe;

The EPA reports are by reference made part of this Finding of Violation and Administrative Order.

- 8. The City of Tempe violated Part V(B)(3) of the 2009 NPDES permit and Part V(A)(3) of the 2004 NPDES permit in that, the Tempe local limits applied to the sewer service area of the Kyrene Water Reclamation Plant were not specific limits developed to be protective of the Kyrene plant from the adverse impacts from non-domestic wastewater discharges. This finding is based on the following findings:

- a. The local limits now in effect were not technically based to be protective of the Kyrene Water Reclamation Plant, but rather developed by the City of Phoenix to be protective of the regional Phoenix 91st Avenue Wastewater Treatment Plant, and adopted by the City of Tempe to be effective in Tempe after January 1, 2005;
- b. The City of Tempe did not develop specific local limits upon the start of operations of the Kyrene Water Reclamation Plant in September 2006;
- c. The Phoenix Coca-Cola Bottling Company can dominate the influent into the Kyrene Water Reclamation Plant, accounting for around 50-60% of the influent BOD loadings, 15-25% of the TDS loadings, and 10-20% of the influent flow;
- d. The City of Tempe identified three other significant industrial users that discharge into the Kyrene Water Reclamation Plant system (Honeywell Aircraft, Motorola Semiconductors, Cox Reels), as well as many smaller non-domestic sources;

- e. There is a potential for operational interference since representatives of the City of Tempe estimated that the industrial and other non-domestic sources account for 55% of the influent wastewater flow into the Kyrene Water Reclamation Plant;
 - f. There is potential for the pass-through of toxicity since the Kyrene Water Reclamation Plant at times has exceeded its NPDES permit chronic toxicity action levels. The City of Tempe determined the toxicity to be related to total dissolved solids content, and now does not discharge excess reclaim water to the Salt River;
 - g. There is potential for the pass-through of copper and selenium since the effluent sampling results for the Kyrene Water Reclamation Plant on rare occasions approached the NPDES effluent permit limits, with effluent maximums of 26.0 µg/l copper (87% of limit), and 2.3 µg/l selenium (77% of limit);
 - i. There is potential for the pass-through of copper, mercury, and silver since the influent sampling results for the Kyrene Water Reclamation Plant at times significantly exceeded the NPDES effluent permit limits, with influent maximums of 790 µg/l copper (2633% of limit), 1.0 µg/l mercury (333% of limit), and 78 µg/l silver (520% of limit).
9. The City of Tempe violated Part V(B)(3) of the 2009 NPDES permit and Part V(A)(3) of the 2004 NPDES permit in that, the City of Tempe incorrectly applied Federal categorical pretreatment standards to one of the three industrial users inspected by EPA. This determination is based on the following findings that were established in the February 27, 2010 EPA inspection report for L3 Electro-Optics Systems:
- a. The City of Tempe permit No.091109-02 issued to L3 Electro-Optics Systems misapplied the Federal categorical pretreatment standards for semiconductor

- wafer fabrication (40 CFR 469 Subpart A), and electronic crystals manufacturing (40 CFR 469 Subpart B), to the north and south outfalls into the Tempe sewers;
- b. L3 Electro-Optics Systems fabricates image intensifiers for night vision goggles, with the on-site operations involving glass fiber wafer fabrication, photo cathode fabrication, phosphor screen production, vacuum intensifier tube assembly and sealing, glass lens fabrication, and the support operations of chemical room equipment cleaning and waste accumulation, machining, fume scrubbing, demineralized water production, and cooling towers;
 - c. The EPA development document for the Federal categorical pretreatment standards in 40 CFR 469 for electrical and electronic components, identified image intensifiers as transmitting vacuum tubes, and defined the fabrication of transmitting vacuum tubes as subject to regulation under the Federal categorical pretreatment standards for metal finishing (40 CFR 433);
 - d. The Federal categorical pretreatment standards in 40 CFR 433 for metal finishing apply to the process wastewaters at L3 Electro-Optics Systems because the on-site operations involve the core metal finishing operations of electroplating, electroless plating, and chemical etching, as well as the associated metal finishing operations of cleaning, sputtering, machining, polishing, vapor plating, vacuum metalizing, and solvent degreasing, all listed in 40 CFR 433.10(a).
10. The City of Tempe violated Parts V(B)(2) and (3) of the 2009 NPDES permit and Parts V(A)(2) and (3) of the 2004 NPDES permit in that, the City of Tempe did not administer its pretreatment program to ensure industrial user compliance through timely, appropriate and effective enforcement actions. This determination is based on the following findings

that were established in the March 26, 2010 and May 28, 2010 EPA inspection reports for Southwest Metal Finishing, and the Phoenix Coca-Cola Bottling Company:

For Southwest Metal Finishing:

- a. The sampling record from January 1, 2007 through September 30, 2009, established 22 violations of the Federal standards in 40 CFR 433 for chromium, copper, nickel, and zinc, and two violations of the local limits for copper, resulting in 225 days of violation;
- b. The period of non-compliance lasted at least 18 months;
- c. From January 2007 through June 2008, there were daily-maximum violations in seven of the 18 samples for metals, and monthly-average violations in four of the seven months with sampling for metals. All 14 samples from July 2008 through September 2009 were in compliance with all Federal standards and local limits;

For the Phoenix Coca-Cola Bottling Company:

- d. The sampling record from January 1, 2008 through March 31, 2010, established 112 pH violations of the national prohibitions in 40 CFR 403.5 and/or the local limits, resulting in at least 112 days of violation. For the 766 days in the sample record with continuous pH measurements, the daily-minimum was below 5.0 s.u. in 86 days, and the daily-maximum was above 10.5 s.u. in 26 days;
 - e. The period of on-going non-compliance so far has lasted at least 27 months.
11. The EPA reports for the three industrial users inspected in September 2009 are by reference made part of this Finding of Violation and Administrative Order.

ADMINISTRATIVE ORDER

Taking these Findings into consideration and considering the potential environmental and human health effects of the violations and all good faith efforts to comply, EPA has determined that compliance in accordance with the following requirements is reasonable. Pursuant to Section 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Act [33 U.S.C. Section 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A)], IT IS HEREBY ORDERED that the City of Tempe City comply with the following requirements:

Self-Monitoring

1. The City of Tempe shall self-monitor the Kyrene Water Reclamation Plant for three months from September 1, 2010 through November 30, 2011, in accordance with the following schedule:

Influent WRP Sampling:

- a. **ONCE EACH DAY**, the City of Tempe shall self-monitor the influent for pH, biochemical oxygen demand (BOD), and total suspended solids (TSS);
- b. **ONCE EACH WEEK**, the City of Tempe shall self-monitor the influent for total dissolved solids (TDS), oil and grease, copper, mercury, selenium, and silver;

Effluent WRP Sampling:

- c. **ONCE EACH DAY**, the City of Tempe shall self-monitor the effluent for the discharge flow rate, biochemical oxygen demand (BOD), and total suspended solids (TSS);
- d. **ONCE EACH WEEK**, the City of Tempe shall self-monitor the effluent for total dissolved solids (TDS), oil and grease, copper, mercury, selenium, and silver;

2. The City of Tempe shall self-monitor and analyze using the sampling protocols and EPA approved analytical methods (or equivalent) to achieve the listed detection limits indicated below:

Parameter	Sampling Protocol	Detection Limit
discharge flow rate	flow meter	-
pH	grab	0.1 s.u.
biochemical oxygen demand	24-hour flow-weighted composite	1 mg/l
total suspended solids	24-hour flow-weighted composite	1 mg/l
total dissolved solids	24-hour flow-weighted composite	10 mg/l
hardness	24-hour flow-weighted composite	5 mg/l
oil and grease	grab	1 mg/l
total copper	24-hour flow-weighted composite	1 ug/l
total mercury	24-hour flow-weighted composite	0.2 ug/l
total selenium	24-hour flow-weighted composite	1 ug/l
total silver	24-hour flow-weighted composite	1 ug/l

3. Samples collected as required by the self-monitoring provisions of the NPDES permit may take the place of samples required by this Order as long as they are equivalent to the requirements in this Order in sample location, sampling protocol (24-hour composite or grab), and analytical detection limit.
4. For each sample, the City of Tempe shall record the sample results, the EPA analytical methods used, the date, time and sample location, sampling protocol (24-hour composite or grab), and the name of the laboratory used.

Pretreatment Program Approval

5. By **JUNE 30, 2011**, The City of Tempe shall submit for review a written description of Chapter 3, Chapter 5, and Chapter 7 of the pretreatment program. The written description of the pretreatment program shall consist of the following chapters:

a. **Chapter 1 - Organization and Multi-jurisdiction Implementation**

No revision necessary.

b. **Chapter 2 - Legal Authority**

No revision necessary.

c. **Chapter 3 - Local Limits**

This chapter would contain the technical basis for local limits that would apply to the Kyrene sewer service area. This would include the analyses necessary to determine the maximum headworks loadings for the Kyrene Water Reclamation Plant and the maximum pollutant levels protective of the collection system, as well as, if necessary, the method of allocating allowable loadings to the users, a schedule of public hearings and outreach, and the ordinance adoption procedures.

This chapter must contain a survey quantifying the copper, mercury, selenium, silver, and main dissolved solids sources, and a control strategy for minimizing loadings into the Kyrene Water Reclamation Plant. If determined to be necessary, the local limits can be numerical concentrations, loading limits, prohibitions, best management practices, or control strategies.

d. **Chapter 4 - Identification of Non-domestic Users**

No revision necessary.

e. **Chapter 5 - Permits and Fact Sheets**

This chapter would describe the permitting procedures, and include fact sheets for each significant industrial user. Each fact sheet must indicate the following:

1. The industry name, address, owner or plant manager;
2. The permit expiration date (not to exceed five years in duration);

3. The identification of the treatment plant sewer service area.
4. A description of the facility including the products made or services provided, building names, the process in each building, and when current operations began;
5. The identification of each sewer connection;
6. A description of the contributing waste streams that comprise each identified non-domestic discharge into the sewers;
7. The pretreatment-in-place for each identified non-domestic discharge to the sewers;
8. The classification by Federal point source category and the reasons justifying this classification;
9. The applicable Federal categorical pretreatment standards (adjusted if necessary to account for dilution), supporting production and flow data (if necessary), and the compliance sampling point(s) where the standards apply;
10. The pollutants of concern and the compliance sampling point(s) where the local limits apply;
11. A site map indicating the locations of all compliance sampling point(s), sewer connections, and sewer laterals;
12. The sampling frequency by regulated pollutant for each compliance sampling point, and the supporting statistical rationale, to ensure that the sampling is representative of the wastewater discharge variabilities over the reporting period;

13. The sampling protocol by regulated pollutant for each compliance sampling point to ensure that the samples collected to determine compliance with Federal standards are representative of the sampling day's discharge.

f. **Chapter 6 - Compliance Monitoring**

No revision necessary.

g. **Chapter 7 - Enforcement**

This chapter would establish the enforcement response plan to be used to address, at a minimum, each of the following types of violations:

1. Violations of permit effluent limits that result in any adverse impacts upon the treatment works such as pass-through, interference, sludge contamination, sewer line degradation, explosive or inflammability risks, or worker health and safety risks;
2. Chronic violations of permit effluent limits;
3. Isolated violations of permit effluent limits;
4. The bypassing of pretreatment necessary to comply with permit effluent limits;
5. Dilution as a substitute for treatment necessary to comply with Federal categorical pretreatment standards;
6. The bypassing of compliance sampling or the tampering with sampling equipment;
7. Failure to perform best management practices necessary to comply with permit limits;

8. Failure to monitor or report;
9. Willful or negligent violations.
- h. **Chapter 8 - Resources**
No revision necessary.
- i. **Chapter 9 - Public Participation and Confidentiality**
No revision necessary.
6. **SIXTY DAYS AFTER RECEIVING APPROVAL** from ADEQ of any local limits developed to be protective of the Kyrene Water Reclamation Plant, the City of Tempe shall adopt and implement a revised ordinance incorporating the local limits.
7. **SIXTY DAYS AFTER RECEIVING APPROVAL** from ADEQ of its enforcement response plan, the City of Tempe shall begin its implementation.
8. **ONE HUNDRED AND EIGHTY DAYS AFTER RECEIVING APPROVAL** from ADEQ of any local limits, the City of Tempe shall issue all permits to its significant industrial users within the sewer service area of the Kyrene Water Reclamation Plant.

Submissions

9. By the **TWENTY-EIGHTH (28th) DAY OF EACH MONTH**, the City of Tempe shall submit all self-monitoring results required by this Order for the previous month. The first monthly report is due on October 28, 2010 for the September 2010 self-monitoring. The last monthly report is due on December 28, 2010 for the November 2010 self-monitoring.
10. By **MARCH 30, 2011**, the City of Tempe shall submit a 70% progress report that outlines the actions that have been completed in preparing for submission the written description of the pretreatment program as required by Item 5 of this Order.

11. All reports submitted pursuant to this Order shall be signed by a principal executive officer of the City of Tempe and shall include the following self-certifying statement:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that all wastewater samples analyzed and reported herein are representative of the ordinary process wastewater flow from this facility. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

12. This Order is not and shall not be interpreted to be an NPDES permit under Section 402 of the Act [33 U.S.C. Section 1342], nor shall it in any way relieve the City of Tempe of obligations imposed by the Act, or any other Federal or State law.

13. All submissions shall be mailed to the following addresses:

U.S. ENVIRONMENTAL PROTECTION AGENCY
75 Hawthorne Street
San Francisco, California 94105
Attn: Greg V. Arthur (WTR-7)

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
1110 West Washington Street
Phoenix, Arizona 85007
Attn: Daniel Czecholinski

14. This Order takes effect upon signature.

Original signed by: Alexis Strauss

July 28, 2010

Alexis Strauss
Director, Water Division

Dated