▲ User:CBJWASTEWATER1, Permittee User



**DMR Copy of Submission** 

Permit

Permit ID: AK0022951 Major:

Permittee: JUNEAU, CITY & BOROUGH OF Permittee Address: 2009 RADCLIFFE ROAD

JUNEAU, AK99801

Facility: JUNEAU, CITY AND BOROUGH OF - MENDENHALL WWTF Facility Location: 2009 RADCLIFFE ROAD

MENDENHALL WWTF

001-A - MENDENHALL RIVER DIFFUSER

JUNEAU , AK99801

Discharge:

Report Dates & Status

**Monitoring Period:** From 03/01/18 to 03/31/18 **DMR Due Date:** 04/15/18

Status: NetDMR Validated

Permitted Feature: 001 - External Outfall

Considerations for Form Completion

FC/Nov-April=1 Effluent & W-Wkly Ave FC/May-Oct=S Effluent & T- Wkly Avg Ammonia/May-Oct=S Effluent

Principal Executive Officer

First Name: Randall Last Name: Brown

**Title:** Wastewwater Treatment Plant Supervisor **Telephone:** 907-586-0393

No Data Indicator (NODI)

Form NODI: -

NODI **Quality or Concentration** Quantity or Loading Freq. of Smpl. **Parameter** of **Analysis** Type Value 2 Value 3 Code Name Value 1 Value 2 Units Value 1 Units Ex.

| Pa                  | rameter                                  | NODI     | Quantity or Loading |                    |              | Quality or Concentration |                   |                     | #             | Freq. of<br>Analysis | Smpl.<br>Type                 |                |
|---------------------|--|----------|---------------------|--------------------|--------------|--------------------------|-------------------|---------------------|---------------|----------------------|-------------------------------|----------------|
| Code                | Name                                     |          | Value 1             | Value 2            | Units        | Value 1                  | Value 2           | Value 3             | Units         | of<br>Ex.            | Allalysis                     | Туре           |
| 00010               | Temperature,<br>water deg.<br>centigrade | Smpl,    |                     |                    |              |                          | =11.7             | =12.2               | 04 - deg<br>C | 0                    | 05/WK -<br>Five Per<br>Week   | GR -<br>GRAB   |
| 1 - Efflu           | uent Gross                               |          |                     |                    |              |                          |                   |                     |               |                      |                               |                |
| Season              | : 0                                      | Req.     |                     |                    |              |                          | Req Mon MO<br>AVG | Req Mon DAILY<br>MX | 04 _ deg<br>C |                      | 05/WK -<br>Five Per<br>Week   | GR -<br>GRAB   |
| NODI: -             | -  | NODI     |                     |                    |              |                          |                   |                     |               |                      |                               |                |
| 00300               | Oxygen,<br>dissolved<br>[DO]             | Smpl,    |                     |                    |              | =2                       |                   | =5                  | 19 -<br>mg/L  | 0                    | 01/30 -<br>Monthly            | GR -<br>GRAB   |
| 1 - Efflu           | uent Gross                               |          |                     |                    |              |                          |                   |                     |               |                      |                               |                |
| Season              | : 0                                      | Req.     |                     |                    |              | Req Mon DAILY<br>MN      |                   | Req Mon DAILY<br>MX | 19 -<br>mg/L  |                      | 01/30 -<br>Monthly            | GR _<br>GRAB   |
| NODI:               | -  | NODI     |                     |                    |              |                          |                   |                     |               |                      |                               |                |
| <b>X</b><br>00310   | BOD, 5-day,<br>20 deg. C                 | Smpl.    | =439                | =578               | 26 -<br>lb/d |                          | =33               | =45                 | 19 -<br>mg/L  | 1                    | 02/30 -<br>Twice Per<br>Month | 24 -<br>COMP24 |
| 1 - Efflu           | uent Gross                               |          |                     |                    |              |                          |                   |                     |               |                      | Month                         |                |
| Season              | : 0                                      | Req.     | <=1226 MO<br>AVG    | <=2452 DAILY<br>MX | 26 -<br>lb/d |                          | <=30 MO AVG       | <=60 DAILY<br>MX    | 19 -<br>mg/L  |                      | 02/30 -<br>Twice Per<br>Month | 24 -<br>COMP24 |
| NODI:               | -  | NODI     |                     |                    |              |                          |                   |                     |               |                      |                               |                |
| 00310               | BOD, 5-day,<br>20 deg. C                 | Smpl.    |                     |                    |              |                          | =624              |                     | 19_           | 0                    | 02/30 -<br>Twice Per          | 24 -           |
| G - Rav<br>Influent | v Sewage<br>t                            | <b>,</b> |                     |                    |              |                          |                   |                     | mg/L          |                      | Month                         | COMP24         |
| Season              | : 0                                      | Req.     |                     |                    |              |                          | Req Mon MO<br>AVG |                     | 19_<br>mg/L   |                      | 02/30 -<br>Twice Per<br>Month | 24 -<br>COMP24 |
| NODI:-              |  | NODI     |                     |                    |              |                          |                   |                     |               |                      |                               |                |
| 00310               | BOD, 5-day,<br>20 deg. C                 | Smpl.    | =483                |                    | 26 -<br>lb/d |                          | =38               |                     | 19 -<br>mg/L  | 0                    | 02/30 -<br>Twice Per          | 24 -<br>COMP24 |
| W - See             | e Comments                               |          |                     |                    | 10/U         |                          |                   |                     | mg/L          |                      | Month                         | COMP 24        |
| Season              | : 0                                      | Req.     |                     |                    |              |                          |                   |                     |               |                      |                               |                |

| Parameter                                | NODI  | Quantity or Loading |                    |              | Quality or Concentration |                   |                     | #<br>of      | Freq. of | Smpl.                         |                |
|--|-------|---------------------|--------------------|--------------|--------------------------|-------------------|---------------------|--------------|----------|-------------------------------|----------------|
| Code Name                                |       | Value 1             | Value 2            | Units        | Value 1                  | Value 2           | Value 3             | Units        | Ex.      | Analysis                      | Туре           |
|  |       | <=1839 WKLY<br>AVG  |                    | 26 -<br>lb/d |                          | <=45 WKLY<br>AVG  |                     | 19 -<br>mg/L |          | 02/30 -<br>Twice Per<br>Month | 24 -<br>COMP24 |
| NODI: -                                  | NODI  |                     |                    |              |                          |                   |                     |              |          |                               |                |
| 0400 pH                                  |       |                     |                    |              |                          |                   |                     |              |          | 05/07 -                       | GR -           |
| Effluent Gross                           | Smpl. |                     |                    |              | =6.6                     |                   | =7.8                | 12 - SU      | 0        | Weekdays                      | GRAB           |
| Geason: 0                                | Req.  |                     |                    |              | >=6.5 INST<br>MIN        |                   | <=8.5 INST<br>MAX   | 12 - SU      |          | 05/07 -<br>Weekdays           | GR -<br>GRAB   |
| NODI: -                                  | NODI  |                     |                    |              |                          |                   |                     |              |          |                               |                |
| 00410 Alkalinity,<br>total [as<br>CaCO3] | Smpl  |                     |                    |              |                          | =140              | =140                | 19 -<br>mg/L | 0        | 01/90 -<br>Quarterly          | 24 -<br>COMP24 |
| - Effluent Gross                         |       |                     |                    |              |                          |                   |                     |              |          |                               |                |
| Season: 0                                | Req.  |                     |                    |              |                          | Req Mon MO<br>AVG | Req Mon DAILY<br>MX | 19 *<br>mg/L |          | 01/90 -<br>Quarterly          | 24 -<br>COMP24 |
| NODI: -                                  | NODI  | i                   |                    |              |                          |                   |                     |              |          |                               |                |
| 0530 Solids, total<br>suspended          | Smpl. | =361                | =488               | 26 -<br>lb/d |                          | =29               | =38                 | 19 -<br>mg/L | 0        | 02/30 -<br>Twice Per<br>Month | 24 -<br>COMP24 |
| - Effluent Gross                         |       |                     |                    |              |                          |                   |                     |              |          | MOITH                         |                |
| eason: 0                                 | Req.  | <=1226 MO<br>AVG    | <=2452 DAILY<br>MX | 26 -<br>lb/d |                          | <=30 MO AVG       | <=60 DAILY<br>MX    | 19 -<br>mg/L |          | 02/30 -<br>Twice Per<br>Month | 24 -<br>COMP24 |
| IODI: -                                  | NODI  |                     |                    |              |                          |                   |                     |              |          |                               |                |
| 0530 Solids, total suspended             |       |                     |                    |              |                          |                   |                     | 19 -         |          | 02/30 -                       | 24 -           |
| 6 - Raw Sewage<br>nfluent                | Smpl. |                     |                    |              |                          | =772              |                     | mg/L         | 0        | Twice Per<br>Month            | COMP24         |
| Season: 0                                | Req . |                     |                    |              |                          | Req Mon MO<br>AVG |                     | 19 -<br>mg/L |          | 02/30 -<br>Twice Per<br>Month | 24 -<br>COMP24 |
| IODI: -                                  | NODI  |                     |                    |              |                          |                   |                     |              |          |                               |                |
| 0530 Solids, total suspended             | Smpl. | =430                |                    | 26 -<br>lb/d |                          | =33               |                     | 19 -<br>mg/L | 0        | 02/30 -<br>Twice Per          | 24 -<br>COMP24 |

| Pa        | rameter  | NODI  | Quantity or Loading |                    |              | Quality or Concentration |                   |                       | #               | Freq. of  | Smpl.                         |                       |
|-----------|--|-------|---------------------|--------------------|--------------|--------------------------|-------------------|-----------------------|-----------------|-----------|-------------------------------|-----------------------|
| Code      | Name   |       | Value 1             | Value 2            | Units        | Value 1                  | Value 2           | Value 3               | Units           | of<br>Ex. | Analysis                      | Type                  |
| Season:   | 0  | Req.  | <=1839 WKLY<br>AVG  |                    | 26 -<br>lb/d |                          | <=45 WKLY<br>AVG  |                       | 19 -<br>mg/L    |           | 02/30 -<br>Twice Per<br>Month | 24 _<br>COMP24        |
| NODI: -   |  | NODI  |                     |                    |              |                          |                   |                       |                 |           |                               |                       |
| 00610     | Nitrogen,<br>ammonia<br>total [as N]                   | Smpl, | =238                | =238               | 26 -<br>lb/d |                          | =19               | =19                   | 19 -<br>mg/L    | 0         | 01/30 -<br>Monthly            | 24 <u>-</u><br>COMP24 |
| 1 - Efflu | ent Gross  |       |                     |                    |              |                          |                   |                       |                 |           |                               |                       |
| Season:   | 0  | Req.  | <=1165 MO<br>AVG    | <=1655 DAILY<br>MX | 26 -<br>lb/d |                          | <=28.5 MO<br>AVG  | <=40.5 DAILY<br>MX    | 19 -<br>mg/L    |           | 01/30 -<br>Monthly            | 24 -<br>COMP24        |
| NODI: -   |  | NODI  |                     |                    |              |                          |                   |                       |                 |           |                               |                       |
| 00900     | Hardness,<br>total [as<br>CaCO3]                       | Smpl. |                     |                    |              |                          | =72               | =72                   | 19 -<br>mg/L    | 0         | 01/30 -<br>Monthly            | 24 -<br>COMP24        |
| 1 - Efflu | ent Gross  |       |                     |                    |              |                          |                   |                       | 9/ =            |           |                               |                       |
| Season    | 0  | Req.  |                     |                    |              |                          | Req Mon MO<br>AVG | Req Mon DAILY<br>MX   | 19 -<br>mg/L    |           | 01/30 -<br>Monthly            | 24 -<br>COMP24        |
| NODI: -   |  | NODI  |                     |                    |              |                          |                   |                       |                 |           |                               |                       |
|           | Copper, total recoverable                              | Smpl. | =0.4                | =0.4               | 26 -<br>lb/d |                          | =32               | =32                   | 28 - ug/L       | 0         | 01/30 -<br>Monthly            | 24 -<br>COMP24        |
|           |  |       | <=3.54 MO           | <=7.63 DAILY       | 26 -         |                          | <=86.7 MO         | <=187 DAILY           | 20//            |           | 01/30 -                       | 24 -                  |
| Season:   | 0  | Req.  | AVG                 | MX                 | lb/d         |                          | AVG               | MX                    | 28 - ug/L       |           | Monthly                       | COMP24                |
| NODI: -   |  | NODI  |                     |                    |              |                          |                   |                       |                 |           |                               |                       |
| 45613     | Floating<br>solids, waste<br>or visible<br>foam-visual | Smpl. |                     |                    |              |                          |                   | =0                    | 9P -<br>N=0;Y=1 | 0         | 01/30 -<br>Monthly            | VI -<br>VISUAL        |
| 1 - Efflu | ent Gross  |       |                     |                    |              |                          |                   |                       |                 |           |                               |                       |
| Season    | 0  | Req.  |                     |                    |              |                          |                   | <=Req<br>Mon DAILY MX | 9P -<br>N=0;Y=1 |           | 01/30 -<br>Monthly            | VI -<br>VISUAL        |
| NODI: -   |  | NODI  |                     |                    |              |                          |                   |                       |                 |           |                               |                       |
| 50050     | Flow, in conduit or                                    | Smpl. | =1.58               | =1.89              | 03 -<br>MGD  |                          |                   |                       |                 | 0         | 99/99 -<br>Continuous         |                       |

| Pa        | rameter                                    | NODI  | Quantity or Loading |                   |             | Quality or Concentration |                   |                   | #                          | Freq. of  | Smpl.                             |                           |
|-----------|--|-------|---------------------|-------------------|-------------|--------------------------|-------------------|-------------------|----------------------------|-----------|-----------------------------------|---------------------------|
| Code      | Name                                       |       | Value 1             | Value 2           | Units       | Value 1                  | Value 2           | Value 3           | Units                      | of<br>Ex. | Analysis                          | Туре                      |
|           | thru<br>treatment<br>plant                 |       |                     |                   |             |                          |                   |                   |                            | <u> </u>  |                                   | RC -<br>Recorde<br>(auto) |
| L - Efflu | ient Gross                                 |       |                     |                   |             |                          |                   |                   |                            |           |                                   | (ddto)                    |
| Season    | : 0  | Req.  | Req Mon MO<br>AVG   | <=4.9 DAILY<br>MX | 03 -<br>MGD |                          |                   |                   |                            |           | 99/99 -<br>Continuous             | RC -<br>Recorde<br>(auto) |
| NODI:     |  | NODI  |                     |                   |             |                          |                   |                   |                            |           |                                   |                           |
|           | Coliform,<br>fecal general<br>uent Gross   | Smpl. |                     |                   |             |                          | =11               | =60               | 13 -<br>#/100mL            | 0         | 02/07 -<br>Twice<br>Every<br>Week | GR ≠<br>GRAB              |
| Season    | : 0  | Req.  |                     |                   |             |                          | <=112 MO<br>GEOMN | <=224 DAILY<br>MX | 13 <del>-</del><br>#/100mL |           | 02/07 -<br>Twice<br>Every<br>Week | GR -<br>GRAB              |
| NODI:     | -  | NODI  |                     |                   |             |                          |                   |                   |                            |           |                                   |                           |
|           | Coliform,<br>fecal general                 | Smpl. |                     |                   |             |                          | =35               |                   | 13 -<br>#/100mL            | 0         | 02/07 -<br>Twice<br>Every<br>Week | GR =<br>GRAB              |
| Season    |  | Req.  |                     |                   |             |                          | <=168 WK<br>GEOMN | ř                 | 13 -<br>#/100mL            |           | 02/07 -<br>Twice<br>Every<br>Week | GR =<br>GRAB              |
| NODI:     |  | NODI  |                     |                   |             |                          |                   |                   |                            |           |                                   |                           |
| 81010     | BOD, 5-day,<br>percent<br>removal          | Smpl. |                     |                   |             | =95                      |                   |                   | 23 - %                     | 0         | 01/30 -<br>Monthly                | CA -<br>CALCTD            |
| K - Per   | cent Removal                               |       |                     |                   |             |                          |                   |                   |                            |           |                                   |                           |
| Season    | : 0  | Req.  |                     |                   |             | >=85 MN %<br>RMV         |                   |                   | 23 - %                     |           | 01/30 -<br>Monthly                | CA -<br>CALCTE            |
| NODI:     | -  | NODI  |                     |                   |             |                          |                   |                   |                            |           |                                   |                           |
| 81011     | Solids,<br>suspended<br>percent<br>removal | Smpl. |                     |                   |             | =98                      |                   |                   | 23 - %                     | 0         | 01/30 -<br>Monthly                | CA -<br>CALCTE            |

| Parameter  |                      | NODI  | <b>Quantity or Loading</b> |         |       | <b>Quality or Concentration</b> |              |                     |                       |           | Freq. of<br>Analysis  | Smpl.<br>Type  |
|------------|----------------------|-------|----------------------------|---------|-------|---------------------------------|--------------|---------------------|-----------------------|-----------|-----------------------|----------------|
| Code       | Name                 |       | Value 1                    | Value 2 | Units | Value 1                         | Value 2      | Value 3             | Units                 | of<br>Ex. | Allalysis             | Туре           |
| K - Percei | nt Removal           | /     |                            |         |       |                                 |              |                     |                       |           |                       |                |
| Season:    | 0                    | Req.  |                            |         |       | >=85 MN %<br>RMV                |              |                     | 23 - %                |           | 01/30 -<br>Monthly    | CA -<br>CALCTD |
| NODI: -    |                      | NODI  |                            |         |       |                                 |              |                     |                       |           |                       |                |
|            | Foxicity,<br>Chronic | Smpl. |                            |         |       |                                 | =1.4         | =1.4                | 73 _<br>toxic         | 0         | 09/99 -<br>See Permit | 24 -<br>COMP24 |
| 1 - Efflue | nt Gross             |       |                            |         |       |                                 |              |                     | toxic                 |           | occ i ciline          |                |
| Season:    | 0                    | Req.  |                            |         |       |                                 | <=5.1 MO AVG | Req Mon DAILY<br>MX | 73 <sub>-</sub> toxic |           | 09/99 -<br>See Permit | 24 -<br>COMP24 |
| NODI: -    |                      | NODI  |                            |         |       |                                 |              |                     |                       |           |                       |                |

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Page 9 of 9

#### Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row; Units, Number of Excursions, Frequency of Analysis, and Sample Type.

## Edit Check Errors

|       | Parameter                | Monitoring         | Field                                      | Туре | Description   | Acknowledge |  |
|-------|--------------------------|--------------------|--|------|---|-------------|--|
| Code  | Name Location            | Location           | rieiu                                      | Туре | Description   | Acknowledge |  |
| 00310 | BOD, 5-day, 20<br>deg. C | 1 - Effluent Gross | Quality or Concentration Sample<br>Value 2 | Soft | The provided sample value is outside the permit limit. (Error Code: ${\bf 1}$ ) | <b>✓</b>    |  |

## **Comments**

# **Attachments**

| Name         | Туре | Size   |
|--------------|------|--------|
| 3090_001.pdf | pdf  | 110029 |

# Report Last Saved By

# JUNEAU, CITY & BOROUGH OF

User: CBJWASTEWATER1

Name: James Westcott

E-Mail: jim.westcott@juneau.org

Date/Time: 2018-04-09 14:37 (Time Zone:-08:00)

Report Last Signed By

User: CBJWASTEWATER1
Name: James Westcott

E-Mail: jim.westcott@juneau.org

Date/Time: 2018-04-09 14:38 (Time Zone:-08:00)

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# Alaska Department of Environmental Conservation

Division of Water, Compliance and Enforcement Program
555 Cordova Street

Anchorage, Alaska 99501

Nationwide Toll Free: 1(877) 569-4114 Anchorage/International: (907) 269-4114 Fax: (907) 269-4604 E-mail address: dec-wqreporting@alaska.gov

# NONCOMPLIANCE NOTIFICATION

| GENERAL INFORMATION  | PERMIT# (if any): AKO              | 002295-1                              |                                     |                   |  |  |  |  |  |
|--|------------------------------------|---------------------------------------|-------------------------------------|-------------------|--|--|--|--|--|
| Owner or Operator:   | Facility Name:                     |                                       | Facility Location:                  |                   |  |  |  |  |  |
| City and Borough of Juneau   | Mendenhall Wastewater              | Treatment Facility                    | Juneau, AK                          |                   |  |  |  |  |  |
| Person Reporting:  | Phone Numbers of Pers              | on Reporting:                         | Reported How? (e.g. by ph           | one);             |  |  |  |  |  |
| Jim Westcott   | 907-586-0393                       |                                       |                                     |                   |  |  |  |  |  |
| Jili Westcott  |                                    |                                       |                                     |                   |  |  |  |  |  |
| Date/Time Event was Noticed:   | Date/Time Reported:                |                                       | Name of DEC Staff Contac            | eted:             |  |  |  |  |  |
| 4/6/2018 @ 1330 pm   | 4/9/18 @ 1400 pm                   |                                       |                                     |                   |  |  |  |  |  |
| VERBAL NOTIFICATION MUST   | BE MADE TO ADEC WITH               | IN 24 HOURS OF DISCO                  | VERY OF NONCOMPLIAN                 | NCE               |  |  |  |  |  |
| INCIDENT DETAILS (attach   | additional sheets, lab r           | eports, and photos as                 | necessary)                          |                   |  |  |  |  |  |
| Period of Noncompliance Start Da   | te/Time (exact): 3/1/2018          | End                                   | <b>Date/Time</b> (exact): 3/31/2018 | 8                 |  |  |  |  |  |
| If noncompliance has not been corre  | cted, provide a statement reg      | arding the anticipated tin            | e the noncompliance is expec        | cted to continue: |  |  |  |  |  |
| N/A  |                                    |                                       |                                     |                   |  |  |  |  |  |
| Estimated Quantity involved (volum   | e or weight);                      |                                       |                                     |                   |  |  |  |  |  |
| (1.58 mg)*(33 mg/l)*(8.34) ~ 429 lbs.  |                                    |                                       |                                     |                   |  |  |  |  |  |
| Description of the noncompliance an  | d its cause (be specific):         |                                       |                                     |                   |  |  |  |  |  |
| Unknown  |                                    |                                       |                                     |                   |  |  |  |  |  |
| Actions taken to reduce, eliminate, a  | nd prevent reaccurrence of r       | oncompliance and Actua                | Potential Impact on Environ         | mental Health     |  |  |  |  |  |
| (describe in detail) (e.g. Supplied dri  |                                    |                                       |                                     |                   |  |  |  |  |  |
| notice)  |                                    |                                       |                                     |                   |  |  |  |  |  |
| Increased waste removal from system.   |                                    |                                       |                                     |                   |  |  |  |  |  |
|  |                                    |                                       |                                     |                   |  |  |  |  |  |
| Permit Condition Deviation (Identify   |                                    |                                       |                                     |                   |  |  |  |  |  |
| Parameter (e.g. BOD pH)  | Permit Limit                       | Exceedance (sample                    |                                     | ole Date          |  |  |  |  |  |
| BOD mg/l   | 30 mg/l monthly average            | 33 mg/l monthly av                    | erage $3/1-3$                       | /31/2018          |  |  |  |  |  |
|  |                                    |                                       |                                     |                   |  |  |  |  |  |
|  |                                    |                                       |                                     |                   |  |  |  |  |  |
|  |                                    |                                       |                                     |                   |  |  |  |  |  |
|  |                                    |                                       |                                     |                   |  |  |  |  |  |
| Corrective Actions (Attach a descrip   | tion of corrective actions tak     | on to restore the system to           | normal operation and to mit         | nimize or         |  |  |  |  |  |
| eliminate chances of recurrence.)  | tion of corrective actions tax     | en to restore the system to           | normal operation and to mil         |                   |  |  |  |  |  |
| In averaged weath name avail from quotom   |                                    |                                       |                                     |                   |  |  |  |  |  |
| Increased waste removal from system.   |                                    |                                       |                                     |                   |  |  |  |  |  |
| Environmental Damage: (if yes, pro   | vide details below)                | Yes                                   | ΓNo ΓU                              | Inknown           |  |  |  |  |  |
| Actual /Potential Impact on Environ  | ment/Public Health (describe       | e in detail)                          |                                     |                   |  |  |  |  |  |
| Unknown  |                                    |                                       |                                     |                   |  |  |  |  |  |
| I certify under penalty of law that this do  | nument and all attachments were    | nrenared under my direction           | or supervision:                     | th a cyctem       |  |  |  |  |  |
|  |                                    |                                       |                                     |                   |  |  |  |  |  |
| designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on myinquity of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and |                                    |                                       |                                     |                   |  |  |  |  |  |
| belief, true, accurate, and complete. I am imprisonment for knowing violations.  | aware that there are significant p | benaities for submitting false        | ntorplation, including the possib   | omity of fine and |  |  |  |  |  |
|  |                                    | 10                                    | 1//                                 |                   |  |  |  |  |  |
| Name: Jim Westcott Tit   | Senior Onsertan                    | Simulation of 1X                      | Date:                               | 4/9 /2018         |  |  |  |  |  |
|  |                                    | Signature: IVE DAYSOF BECOMIN         |                                     |                   |  |  |  |  |  |
| FORMS MUST BE S  | ENI IO ADEC WIIIIN F               | I V D DA I DE IIV IN IL I I I I I I I |                                     | 2                 |  |  |  |  |  |