PLAINTIFF'S EXHIBIT

CAP-1298

A/C Pipe Producers Association

Executive Committee

Internal Correspondence

TO J. F. Welch

J. F. Welch, Vice President

FROM

June 15, 1982

DATE

SUBJECT U.S. Environmental Protection Agency (EPA) - Modification of Standards for pH Values for Manufacturing Point Sources

ACTION REQUIRED: Review for information

Background

On December 9, 1980, EPA proposed a rule that would adjust effluent limitations guidelines for pH. The proposal, prompted by a petition from a number of industries, claimed "inherent limitations in the treatment technology for pH control prevent compliance with the pH standard 100 percent of the time."

Under authority of the Federal Water Pollution Control Act (Clean Water Act), guidelines and standards are established on the levels of pH, total suspended solids and chemical oxygen demand in wastewater discharged from A/C pipe plants to waterways. The pH of such effluents must be within the range of 6.0 to 9.0. By July 1, 1984, best available technology requirements mandate no discharge of process wastewater to navigable waters.

Current Status

The enclosed regulations relax effluent guidelines for manufacturing facilities that continuously monitor pH values. The discharger now must maintain pH within the 6.0 to 9.0 range except excursions are permitted outside the range as long as they do not exceed 7 hours and 26 minutes in any calendar month and no individual excursion exceeds 60 minutes.

If you have any questions, please do not hesitate to call.

JFW/ajb

cc: A. Kahn, Esq.

copies to: Executive Committee

L. Ambler
J. Cran
L. Taylor

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Chrono



Federal Register

Friday
June 4, 1982

Part III

Environmental Protection Agency

Modification of Effluent Limitations Guidelines and Standards for pH Values for Point Sources That Continuously Monitor Effluent pH; Final Rule

CAPCO JEN 0033291

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Part 401

[FRL 1930-1]

Modification of Effluent Limitations Guidelines and Standards for pH Values for Point Sources That Continuously Monitor Effluent pH

AGENCY: Environmental Protection Agency.

ACTION: Final rule.

SUMMARY: The Environmental Protection Agency (EPA) today promulgates a regulation which modifies effluent limitations guidelines for pH for all industrial dischargers (1) to require compliance with pH limitations 99 percent of the time measured on a monthly basis for industrial dischargers who, pursuant to National Pollutant Discharge Elimination System (NPDES) permits, continuously monitor the pH of effluent discharge wastewaters and (2) to limit for such dischargers the duration of individual excursions from the required pH range to 60 minutes. This final rule is the Agency's response to a petition from a number of industrial companies. The petitioners requested changes in regulations governing pH levels in effluent discharge wastewater when continuous monitoring of pH is required by NPDES permit. The Agency agrees with the basis for the petition and is promulgating this regulation which is designed to relieve facilities that monitor pH continuously of the obligation to conform to categorical pH standards 100 percent of the time.

DATE: Effective date of the amendment is July 6, 1982. In accordance with 40 CFR 100.01, these regulations shall be deemed issued for purposes of judicial review at 1:00 p.m. Eastern Time on June 18, 1982.

FOR FURTHER INFORMATION CONTACT: Russell Roegner, Water Regulations and Standards (WH-586), U.S. Environmental Protection Agency, 401 M Street, SW., Washington, D.C. 20460, (202) 755-3624.

SUPPLEMENTARY INFORMATION:

I. Background

On December 9, 1980, EPA proposed a rule that would adjust effluent limitations guidelines for pH (45 FR 81180). The final rule set forth below will adjust effluent limitations guidelines for all industrial dischargers who, pursuant to National Pollutant Discharge Elimination System (NPDES) permits continuously monitor pH in discharge wastewaters. Today's rule includes changes and clarifications which reflect comments received by the Agency on the proposed rule. The official record on which this regulation is based is available for inspection at Room M2404, U.S. EPA, 401 M St., SW., Washington, D.C. 20460 from 9:00 a.m. to 4:00 p.m. Monday–Friday excluding federal holidays.

The following documents are available for public inspection:

- "pH Control of Industrial Effluent", prepared by Centec Consultants, Inc. Reston, Virginia for Cleary, Gottlieb, Steen, and Hamilton, (June 1978). Volumes 1 and 2.
- "An Assessment of pH Control of Process Water in Selected Plants", prepared by JRB, Associates, Inc., McLean, Virginia for EPA, Contract No. 69-01-3881, (March 1979).
- "Analysis of Data Collected for EPA by JRB Associates Relating to the Establishment of National pH Limitations Guidelines", prepared by Centec Corporation, Reston, Virginia for Cleary, Gottlieb, Steen and Hamilton, (July 1979).
- "pH Control of Industrial Waste Waters in the Inorganic Chemicals Industry", prepared by Jacobs Engineering Group, Inc. Pasadena, California for EPA Contract No. 68-01-5167, (October, 1979).
- "Statistical and Documentation Support for pH Regulation Development", prepared by JRB Associates, Inc., McLean, Virginia, for EPA Contract No. 68-01-6048, (July, 1980).
- "Effluent pH Control Review Phosphate Fertilizer Industry". Submitted by JRB Associates, Inc., McLean, Virginia; prepared by CH2M Hill Southeast, Inc., Montgomery, Alabama for Environmental Protection Agency Region IV, Atlanta, Georgia, EPA Contract No. 68-01-5052.
- "Background Document for Modification of pH Effluent Limitations Guidelines and Standards for Point Sources Required by NPDES Permit to Monitor Continuously Effluent pH." EPA 440/2-80-083, (November, 1980).
- Two bound volumes of public comments received on the December 9, 1980 proposed regulation.
- "Technical, Analytical, and Statistical Support for Promulgation of Final pH Regulations," prepared by JRB Associates, Inc., McLean, Virginia, for EPA Contract No. 68-01-6048 (August, 1981).
- Summary of Public Comments and EPA's Responses for Final pH Regulation.

The final rule has evolved in response to a petition from a number of industrial companies which represent the following manufacturing point source categories: inorganic chemicals, fertilizer manufacturing, iron and steel manufacturing, non-ferrous metals manufacturing, phosphate manufacturing, and organic chemical manufacturing (see 45 FR 81180). The petitioners contend, and the Agency agrees, that inherent limitations in the treatment technology for pH control prevent compliance with the pH standard 100 percent of the time.

The pH standards were intended initially for use with grab and/or composite sampling procedures. However, with the introduction of requirements for continuous monitoring instrumentation in NPDES permits, a more thorough monitoring procedure was applied in assessing the pH of effluent wastewater. Today's adjustment to the pH limitations establishes a standard for use with continuous monitoring that well-maintained and well-operated plants realistically can achieve. *The regulation is designed to relieve facilities that monitor pH continuously of the obligation to conform to categorical pH standards 100 percent of the time.* EPA and permittee resources will be reserved for those instances where substantial pH control problems exist.

This rule and its underlying rationale relate solely to the control of pH values when wastewater is continuously monitored. The rule does not reflect any change in the Agency position with respect to unintentional violations of other effluent limitations guidelines, such as BOD. Of course, to the extent that pH violations occur despite the excursion allowance promulgated here, dischargers may continue to invoke the "upset" provision where appropriate.

II. Legal Authority

This regulation is issued under the authority of sections 301, 304, 306 and 501 of the Clean Water Act (the Federal Water Pollution Control Act Amendments of 1972, 33 U.S.C. 1251 *et seq.*, as amended by the Clean Water Act of 1977, Pub. L. 95-217).

III. Scope of Rulemaking

This regulation applies to all dischargers who continuously monitor pH pursuant to NPDES permits issued in accordance with EPA effluent limitations guidelines. This regulation will not immediately affect existing permit limitations. In accordance with 40 CFR 122.15, affected dischargers may petition for a modification of their permits to incorporate its provisions.

CAPCO JEN 0033292

IV. Summary of Data Collection and Method Used in pH Regulation Development

On August 3, 1978, a number of industrial companies, representing a variety of manufacturing point source categories, petitioned the Environmental Protection Agency seeking relief from the requirement that the pH values of their effluent, as measured on a continuous basis, always be within a specified range. (Cleary, Gottlieb, et al., Petition to EPA regarding "pH Effluent Limitations Guidelines and Standards of Performance for Certain Manufacturing Point Source Categories," Washington, D.C. (August 1978)). The petitioners contended that inherent limitations in the treatment technology for pH control prevented compliance with this standard 100 percent of the time and that provision for unavoidable "excursions" from the prescribed range was warranted. The petition, accompanied by technical data and analysis ("pH Control of Industrial Effluent," prepared by Centec Consultants, Inc., Reston, Virginia, for Cleary, Gottlieb, Steen and Hamilton, (June, 1978)), requested that the effluent limitations guidelines be revised to allow excursions approximately one percent of the time on a monthly basis. In addition, the petitioners suggested that a reporting requirement be established for extremely acidic or basic individual excursions, i.e., below pH 3.5 or above pH 11, that were longer than 15 minutes in duration.

In response to the petition, EPA studied the control of pH in wastewaters in selected petition industrial categories. This study confirmed the principal contention of the petitioners that a plant treating highly acidic or basic waste does not achieve on a continuous basis, 100 percent of the time, pH values within the range set forth in applicable effluent guidelines. The data indicate that a well-designed, well-operated plant using continuous monitoring would record excursions outside the prescribed range approximately one percent of the time on a monthly basis ("Assessment of pH Control of Process Waters in Selected Plants," prepared for EPA by JRB Associates, Inc., McLean, Virginia, Contract No. 68-01-3881 (March, 1979)).

A critical evaluation of the JRB report was performed for the petitioners ("Analysis of Data Collection for EPA by JRB Associates Relating to the Establishment of National pH Limitations Guidelines," prepared by Centec Corporation, Reston, Virginia for Cleary, Gottlieb, Steen and Hamilton, (July 1979)). The petitioners' evaluation did not contradict the conclusions reached in the earlier Agency-supported analysis. Centec indicated that proper analysis of the data in the JRB report would determine stringent but attainable pH limitations for the majority of plants falling in the industrial categories studied. However, Centec asserted that the JRB study plants utilized highly sophisticated pH control systems and that many plants would find it impossible or too expensive to meet performance standards based on such a select group of operating systems. Following a data editing procedure which reduced the number of plants studied from six to four, Centec analyzed the data and recommended a monthly compliance requirement of 98.57% and a daily compliance requirement of 85.4%. In addition, Centec recommended that any excursion not in the pH range 3.5 to 11.0 be limited in duration to no longer than 15 minutes.

Independently of the JRB report, the Agency commissioned another study focusing on the Inorganic Chemicals Manufacturing Point Source Category ("pH Control of Industrial Waste Waters in the Inorganic Chemicals Industry," prepared for EPA by Jacobs Engineering Group, Inc., Pasadena, California, Contract No. 68-01-5167 (October, 1979)). The results of this study support the conclusions of the first Agency study.

To examine technical and statistical issues raised by petitioners, Centec, and the Agency itself, analyses of the combined data obtained in the Agency's two previous studies were undertaken ("Statistical and Documentation Support for pH Regulations Development," prepared for EPA by JRB Associates, Inc., McLean, Virginia, Contract No. 68-01-6048 (July, 1980)). The results of this study were used in formulating the proposed pH regulation and Agency support document. ("Background Document for Modification of pH Effluent Limitations Guidelines and Standards for Point Sources Required by NPDES Permit to Monitor Continuously Effluent pH," prepared by EPA, Office of Analysis and Evaluation, Washington, D.C. (November, 1980), EPA 440/2-80-083). Re-evaluation of the outstanding issues led the Agency to propose, on December 9, 1980, that noncompliance with pH values must not exceed one percent of the time on a 30-day month basis and that the duration of individual excursions from the prescribed range must not exceed 30 minutes. In addition, the proposed regulation allowed the Director to set more stringent monthly limits in order to meet water quality standards and more stringent individual excursion limits based on consideration of treatment systems, plant configurations, or other factors. Public comments on the proposed regulations were then evaluated in formulating the final regulations ("Technical, Analytical, and Statistical Support for Promulgation of Final pH Regulations," prepared by JRB Associates, Inc., McLean, Virginia, for EPA Contract 68-01-6048 (August, 1981)).

Analysis of the Agency data bases and of public comments on the proposed rule has led the Agency to the following conclusions with respect to a final rule. No plant examined in the course of this review consistently achieved 100 percent compliance with the pH limitation on a monthly basis. Plants employing continuous monitoring can expect short term excursions outside the pH permit range during a month. In this situation, sole reliance on the upset provision (40 CFR 122.60(h)) appears unwarranted, as its use would not be reserved for a limited, exceptional class of incidents. Permittees would bear a considerable burden in establishing the occurrence of an upset and there would be a drain on administrative resources. Adjustment of the standard to require compliance 99 percent of the time during continuous monitoring will establish a standard that well-operated and well-maintained plants can realistically achieve and will reserve the resources of both EPA and permittees for those instances when substantial pH control problems exist.

EPA believes that a limit on the length of an individual excursion is necessary to: (1) Promote immediate reaction to pH excursions; (2) facilitate enforcement against intentional excessive discharges; and (3) discourage the retention ("banking") of acidic or basic wastes which are discharged by the intermittent release of wastewater outside the permissible pH range for extended periods but controlled so that the total monthly excursion duration limitation is not violated. Early Agency analyses (See Background Document, Appendix, *pH Under Continuous Monitoring*) recommended a 15 minute individual excursion limitation. The petitioners objected that 15 minutes was too short for locating and diagnosing the many causes of pH excursions. In addition, they maintained that response time varied on a site specific basis. After considering various individual limits with respect to the concerns expressed by the petitioners and various Agency offices, the Agency increased the individual excursion limitation from 15 minutes to 30 minutes for the proposed

CAPCO JEN 0033293

regulation. The proposal also included discretionary authority to impose a more stringent limitation in individual cases. The Agency proposal specifically requested comment on the 30 minute individual excursion limitation.

In general, public commenters considered the proposed individual excursion duration limitation of 30 minutes excessively stringent. Many public commenters favored elimination of the individual excursion duration limitation from the final regulation, contending that the monthly limitation is sufficient to force the permittee to react in a timely fashion to correct pH excursions. The Agency continues to support the inclusion of an individual excursion duration limitation in the regulation as a means of promoting immediate action to rectify excursions and of discouraging the "banking" of acidic or alkaline wastes for discharge into receiving water. In an attempt to resolve the conflict with the commenters on this issue, the Agency performed additional analyses of the data base.

The Agency traditionally has recognized that it must take variability into account in establishing effluent limitations; and in recognition that 100 percent compliance is theoretically impossible, the Agency has generally set daily effluent limitations which would be met approximately 99 percent of the time. The analyses described below utilize this one percent exceedance criterion. Two distinct statistical methodologies were applied to estimate the probability of one or more excursions on any day exceeding a specified limitation value. The estimated probability was assessed to determine whether the associated limitation value was consistent with the Agency's one percent exceedance criterion. The methodologies were applied for the proposed individual excursion limitation of 30 minutes and for a 60 minute limitation. The 60 minute limit was considered because public commenters suggesting alternative limits usually requested at least an hour.

After re-evaluating the existing data and reviewing the public comments, the Agency has concluded that a 60 minute individual excursion duration limitation probability is consistent with Agency policy requiring approximately a one percent exceedance probability when determining daily limitations. Accordingly, the final rule has been changed to limit any individual excursion to a duration of 60 minutes. While other individual excursion limitations may also be consistent with the one percent exceedance criterion, the Agency believes, in light of environmental considerations, that 60 minutes is the most appropriate individual excursion limitation. For detailed documentation on the methodologies the reader is referred to "Summary of Public Participation and Agency Response to Public Comments on *Modification of Effluent Limitations Guidelines and Standards for pH Values for Point Sources That Continuously Monitor Effluent pH*" and "Technical, Analytical, and Statistical Support for Promulgation of Final pH Regulation", prepared for EPA by JRB Associates, Inc., McLean, Virginia, for EPA contract 68-01-6048 (August 1981).

V. Summary of Proposal and Major Changes to the Proposed Rule

The proposed rule provided that dischargers, who were required by NPDES permits to continuously monitor pH discharge, would be subject to modified effluent limitations guidelines for pH. The applicable guidelines would be modified to allow excursions from the mandated pH range for periods up to 30 minutes, subject to a total excursion time of 7 hours and 12 minutes per month.

The word "excursion" was defined as an "unintentional and temporary" incident of noncompliance with the prescribed pH range. Intentional variations from that range, regardless of duration, remained subject to EPA enforcement action.

In addition, the proposed rule authorized the Director to impose more stringent requirements in order to meet water quality standards or other requirements of Federal or state law and to impose an excursion limitation time of less than 30 minutes, if a facility's treatment system, plant configuration or other factors justified the shorter limitation.

As a result of comments and evaluation of data, the following changes have been made to the proposed regulation.

(1) In § 401.17(a)(1) of the proposed rule, the Agency defined one percent of a month as 7 hours and 12 minutes. This monthly limit was based on a 30-day month and applied equally to 28-, 29-, or 31-day months. The Agency agrees with those commenters who argued that a rule based on one percent of a calendar month or a 31-day month would be more equitable than one based on a 30-day month. Accordingly, the final proposed rule is to be based on one percent of a 31-day month, or 7 hours and 26 minutes for any month.

(2) The major change to the proposed rule is the allowance of a 60-minute individual excursion instead of 30 minutes. This change is based on the one percent exceedance criteria discussed above and the large number of public comments on the issue.

(3) As several commenters noted, the Clean Water Act and § 122.62(d) of the Consolidated Permit Regulations already authorize the imposition of more stringent requirements where necessary to meet water quality standards. Accordingly, similar language in § 401.17(b) of the proposal has been deleted.

(4) Section 401.17(b) has been changed to allow the Director to adjust the individual time in either direction to reflect technical considerations.

While the Agency believes that the vast majority of facilities will be able to limit individual pH excursions to 60 minutes, there may be some who, because of plant configuration, treatment system or other technological factors, are unable to meet that limitation. Since today's rule, which relaxes currently effective pH requirements in all industrial categories regulated by effluent guidelines, does not identify a specific technology for limiting individual excursion times, the Agency recognizes that the normal variance procedure, based on the demonstration of "fundamentally different factors" from those supporting the rule (40 CFR 125.30), may not be appropriate for facilities which cannot meet the 60 minute limitation. Accordingly, today's rule will allow the Director to increase the individual excursion time in those few instances where a facility can demonstrate technological reasons which generally preclude it from limiting individual excursions to 60 minutes.

As noted above, the individual excursion limitation was included to promote immediate reaction to pH excursions, to facilitate enforcement action against intentional excessive discharges and to discourage "banking" of acidic and basic wastes for controlled extended duration release. Thus, the individual limitation is ancillary to, although more stringent than, the monthly limitation of 7 hours and 26 minutes. While discretionary adjustment is authorized for plants which cannnot meet the 60-minute limitation, the primary monthly limitation requirement will remain in effect. The Agency is aware of no technological factors which make compliance with the monthly limitation unachievable.

The Director is also authorized to impose a shorter individual excursion time if he concludes that the facility's treatment system, plant configuration, or other technological factors so warrant.

CAPCO JEN 0033294

(5) The rule has also been changed to apply to the discharge of any wastewater (not only process wastewater), where an NPDES permit, issued in accordance with applicable effluent limitations guidelines requires or allows the continuous monitoring of pH. Although most effluent guidelines regulate process wastewater only, if a continuously monitoring permittee's guideline applies to process and non-process wastewater, than the regulation applies to both process and non-process wastewater.

(6) Finally, the last sentence of 40 CFR 401.10 is being modified to make it clear that this regulation modifies all specific guidelines, issued under Parts 402 through 499, which regulate the pH value of discharge wastewater.

VI. Relationship to NPDES Permits

Conditions in NPDES permits are based on effluent limitations guidelines applicable to the point source category involved and on water quality standards. Discharge of pollutants except in compliance with a permit is a violation of the Clean Water Act (section 301(a)). The modification of effluent guidelines, as by today's rule, does not and cannot modify the provisions of existing permits. However, on the basis of today's action, dischargers who pursuant to NPDES permits continuously monitor the pH values of their effluent will be able, pursuant to 40 CFR 122.15(a)(3), to seek modification of their permits to incorporate the provisions of this rule. Under that section, permittees seeking modification of their permits must do so within 90 days of today's publication. As individual permits expire, new permits will be subject to the provisions of today's rule.

Since today's rule is a modification of effluent limitations guidelines, it does not apply to permits which are not governed by effluent guidelines. However, the Agency is recommending to NPDES states and regions that the policy of granting short term excursions be considered in permit issuance for non-guideline areas.

EPA emphisizes that although the Clean Water Act is a strict liability statute, the initiation of enforcement proceedings by the Agency is discretionary. The Agency acknowledges that even a well-operated and well-maintained plant cannot realistically achieve 100 percent compliance with its pH standard when continuously monitoring pH. By setting monthly and individual excursion duration limits, the Agency concedes that plants required to monitor pH continuously will experience pH violations as rare events. With respect to pH violations, EPA will continue to exercise discretion in a manner which recognizes and promotes good faith compliance efforts, and conserves enforcement resources for those who fail to make good faith efforts to comply with the Act.

VII. Public Comments and Agency Responses

A summary of the public comments received on the December 9, 1980 proposal and the associated Agency responses is available for inspection at Room M2404, U.S. EPA 401 M St., SW., Wash., D.C. 20460 from 9:00 a.m. to 4:00 p.m. Monday–Friday excluding Federal holidays.

VIII. Economic and Regulatory Impact Analysis

Today's rule represents a relaxation of currently effective effluent guidelines with respect to facilities which continuously monitor pH. Affected industries which obtain permit modification will no longer have to comply with pH limitations 100 percent of the time. Hence this rule can only decrease the economic burden on industry as compared to that imposed by existing regulations. Some commenters agreed that the proposed rule was likely to decrease long run costs and cited it as an "excellent example of a cost-effective modification of an EPA guideline."

Executive Order 12291 requires EPA to judge whether a regulation is "major" and therefore subject to the requirement of a Regulatory Impact Analysis. Since today's rule serves only to relax existing regulations, it is not a "major" rule. Similarly, although this rule was proposed before January 1, 1981 and is therefore not subject to the Regulatory Flexibility Act, it will only *decrease* the regulatory economic burden on industry and therefore will not have a significant impact on a substantial number of small entities. Accordingly, a Regulatory Flexibility Analysis would not be required even if the Regulatory Flexibility Act were applicable.

Some commenters have objected that today's rule will result in more frequent permit requirements for continuous monitoring of pH or more vigilant enforcement action. There is no basis to support either contention. Enforcement discretion will continue to be governed by the same policies as are currently in effect.

The regulation was submitted to the Office of Management and Budget for review as required by Executive Order 12291. Any comments from OMB to EPA and any EPA response to those comments are available for public inspection at Room M2404, U.S. EPA, 401 M St., SW. Wash., D.C. 20460 from 9:00 a.m. to 4:00 p.m. Monday-Friday excluding Federal holidays.

List of Subjects 40 CFR Part 401

Water pollution control, Waste treatment and disposal.

Dated: May 21, 1982.

Anne M. Gorsuch,

Administrator.

Authority: Sections 301, 304, 306 and 501 of the Clean Water Act (the Federal Water Pollution Control Act Amendments of 1972, 33 U.S.C. 1251 et. seq., as amended by the Clean Water Act of 1977, Pub. L. 95–217).

PART 401—GENERAL PROVISIONS

EPA amends Title 40 CFR Part 401 as follows:

1. The last sentence of 40 CFR 401.10 is amended to read as follows:

§ 401.10 Scope and purpose.

* * * * *

Except as provided in § 401.17, in the case of any conflict between regulations issued under this Part 401 and regulations issued under Part 402 through 499 of this subchapter, the latter more specific regulations shall apply.

2. A new § 401.17 is added as follows:

§ 401.17 pH Effluent limitations under continuous monitoring.

(a) Where a permittee continuously measures the pH of wastewater pursuant to a requirement or option in a National Pollutant Discharge Elimination System (NPDES) permit issued pursuant to section 402 of the Act, the permittee shall maintain the pH of such wastewater within the range set forth in the applicable effluent limitations guidelines, except excursions from the range are permitted subject to the following limitations:

(1) The total time during which the pH values are outside the required range of pH values shall not exceed 7 hours and 26 minutes in any calendar month; and

(2) No individual excursion from the range of pH values shall exceed 60 minutes.

CAPCO JEN 0033295

(b) The Director, as defined in § 122.3 of this chapter, may adjust the requirements set forth in paragraph (a) of this section with respect to the length of individual excursions from the range of pH values, if a different period of time is appropriate based upon the treatment system, plant configuration or other technical factors.

(c) For purposes of this section, an "excursion" is an unintentional and temporary incident in which the pH value of discharge wastewater exceeds the range set forth in the applicable effluent limitations guidelines.

[FR Doc. 82-15177 Filed 6-3-82; 8:45 am]
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