

INSPECTION REPORT

Inspection Entry Date/Time	04/18/2024 9:15 (CT)	Announced: No
Inspection Exit Date/Time	04/18/2024 10:30 (CT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	Focused Compliance Inspection (FCI)	
Facility or Site Name	Southern Devall	
Facility/Site Identifier	N/A	
Facility/Site Physical Address	2244 Swisco Rd	
City, State, Zip Code	Sulphur, LA 70665	
County/Borough	Calcasieu Parish	
Generator Status	None	
NAICS	N/A	
Type of Operation	Southern Devall provides diesel services for in-house and third-party barges. This location also acts as an administrative building for their entire company.	
Geographic Coordinates	30.208647, -93.331751	
Additional Persons Participating in Inspection:		
Name	Title	Organization
Elizabeth Pham	Inspector	EPA REGION 6
Sandesh Thapa	Inspector	EPA REGION 6
Anshul Paripati	Contractor	Eastern Research Group (ERG)
Lead Inspector:		
Cameron Tanaka		07/24/2024
	ERG	Cameron.Tanaka@erg.com
		(703) 633-1632 ext. 11632

SECTION I – INTRODUCTION**Site Entry and Purpose of the Inspection**

Type of inspection: Focused Compliance Inspection (FCI)

The Port of Lake Charles and surrounding facilities were selected for inspection based on an Environmental Justice and Regional initiative to evaluate facilities at ports receiving or transporting Resource Conservation and Recovery Act (RCRA)-regulated hazardous wastes, and/or have an International Convention for the Prevention of Pollution from Ships (MARPOL) Annex V Certificate of Adequacy (COA) issued by the U.S. Coast Guard (USCG).

This report is based on information supplied by the facility representatives, inspector observations, port related facilities, and records including photographs taken (see Appendix 1), verbal or written statements made during or after the on-site inspection, and/or materials shown, demonstrated, or submitted to the EPA during or after the on-site inspection. In addition, information gathered prior to or after the inspection from a review of EPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/ Contractor/ERG	Cameron Tanaka	(703) 633-1632 ext. 11632	Cameron.Tanaka@erg.com	Yes	No
RCRA Inspector/ Contractor/ERG	Anshul Paripati	(571) 535-1503	Anshul.Paripati@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Elizabeth Pham	(214) 665-8354	Pham.elizabeth@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Sandesh Thapa	(214) 665-2265	Thapa.sandesh@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Southern Devall	04/18/24	Southern Devall (Devall) has three divisions: marine (providing inland boats and tugboat services), diesel and generator services, and fleeting services. The facility inspected included an administration building and diesel services. Devall services in-house barges and external companies' barges. They perform services including maintenance, engine overhauls, and engine repairs. They do not have a MARPOL COA.	Yes

SECTION II – OBSERVATIONS

Tenant: Southern Devall			
Section: 2.1	Date: 04/18/24, 9:15 AM	Contains AOC: Yes	Contains CBI: No
Lead Inspector: Cameron Tanaka	Attendees: Carlin Chapman (EVP-HSSE&C) and David Devall (GM Devall Diesel)		
Southern Devall (Devall) operates with three divisions: marine, diesel and generators, and fleeting. Their marine division operates 68 vessels and 8 to 9 contract vessels consisting of inland boats and tugboats. This location included Devall’s administration building and diesel services building. Their diesel services building services in-house and external companies’ vessels. This includes maintenance, engine overhauls, engine repairs, and providing new engines. They have not performed any barge cleaning since 1999. They generate used oil and universal waste such as used antifreeze through these services. These are contained in drums and totes until they are filled. Once filled, these wastes are recycled or sent off site through third party transporters. The inspection team reviewed a used oil bill of lading from Action Oil and found no issues. Devall strips paint during engine overhauls and these waste paints are put into containers. Used batteries and fluorescent lamps are disposed of by a third party. They also operate parts washers with solvents in their diesel services building which are recycled by the solvent vendor. No waste is generated by these parts washers. No waste is taken off ships by Devall. Devall does not have an EPA ID and they follow the MARPOL regulations but do not have a MARPOL COA. The inspection team then performed a walk-through of Devall’s diesel services building. The team observed that Devall had two used oil totes labelled as “oil only” and one container of oily rags labelled as “oil rags only” (see Appendix 1 – Photos 1, 2, 5, 6, 9, and 10). [AOC #1 – Devall did not clearly label containers used to store used oil with the words “Used Oil” - 40 CFR 279.22(c)(1)] Mr. Chapman provided a follow-up email on May 2 (see Appendix 2). This follow-up email included updated pictures of these used oil containers (see Appendix 3 – Photos 9, 10, and 11). Devall’s used antifreeze tote was labelled as “coolent only” (see Appendix 1 – Photos 3 and 4). [AOC #2 – Devall did not label or mark clearly their used antifreeze with one of the following phrases: "Universal Waste- Antifreeze," or "Waste Antifreeze," or "Used Antifreeze."- La. Admin. Code tit. 33, § V-3823 A.8.] Devall’s follow-up email included an updated picture of this container (see Appendix 3 – Photo 8). The follow-up email also included a picture of their universal waste battery area (see Appendix 3 – Photo 1) and pictures of their garbage cans with added general waste labels (see Appendix 3 – Photo 2-7). The inspection team also observed a tote for used oil with a drum lid acting as its cap (see Appendix 1 – Photos 7 and 8). The inspection team did not observe other AOCs at the time of the inspection. A closing conference was conducted at approximately 3:45 PM with Devall personnel. The inspection team requested waste manifests for used oil, paint stripped from engines, fluorescent lamps, parts washer fluid, used batteries, and used coolant. The AOCs were communicated during the closing. In their follow-up email (see Appendix 2), Devall personnel followed up with manifests for used oil filters and absorbents, used batteries, parts washer fluids, and fluorescent lamps (see Appendix 4). There were no issues noted related to these manifests.			

SECTION III – RECORDS REVIEW

No RCRA regulated records reviewed during this focused onsite inspection.

SECTION IV – APPARENT AREAS OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Tenant: Southern Devall		
AOC #1 – Devall did not clearly label containers used to store used oil with the words “Used Oil.”	Citation: 40 CFR 279.22(c)(1)	Section: 2.10
AOC #2 – Devall did not label or mark clearly their used antifreeze with one of the following phrases: "Universal Waste- Antifreeze," or "Waste Antifreeze," or "Used Antifreeze."	Citation: La. Admin. Code tit. 33, § V-3823 A.8.	Section: 2.10

SECTION V – CLOSING CONFERENCE AND FOLLOW UP**Follow-Up**

Any facility follow-up items are as discussed in each facility’s observations in Section II. Documents or files provided by the facilities were transmitted via email and included responses to areas of concern or provision of documents requested.

Communication Log

During and after the inspection, additional information was emailed to EPA including:

1. 05/02/24 Southern Devall email – Carlin Chapman sent an email containing the documents requested during the inspection and several photographs of corrective actions implemented at the site.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Follow-Up Email from Southern Devall

Appendix 3. Follow-Up Photographs from Southern Devall

Appendix 4. Southern Devall Waste Manifests

APPENDIX 1.
PHOTOGRAPH LOG



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Southern Devall		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7183

Date of Photo: 04/18/2024

Time of Photo: 08:53 hrs.

Photographer: Anshul Paripati

Description: Used oil tote labeled as "oil only" in Devall's diesel services building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Southern Devall		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana

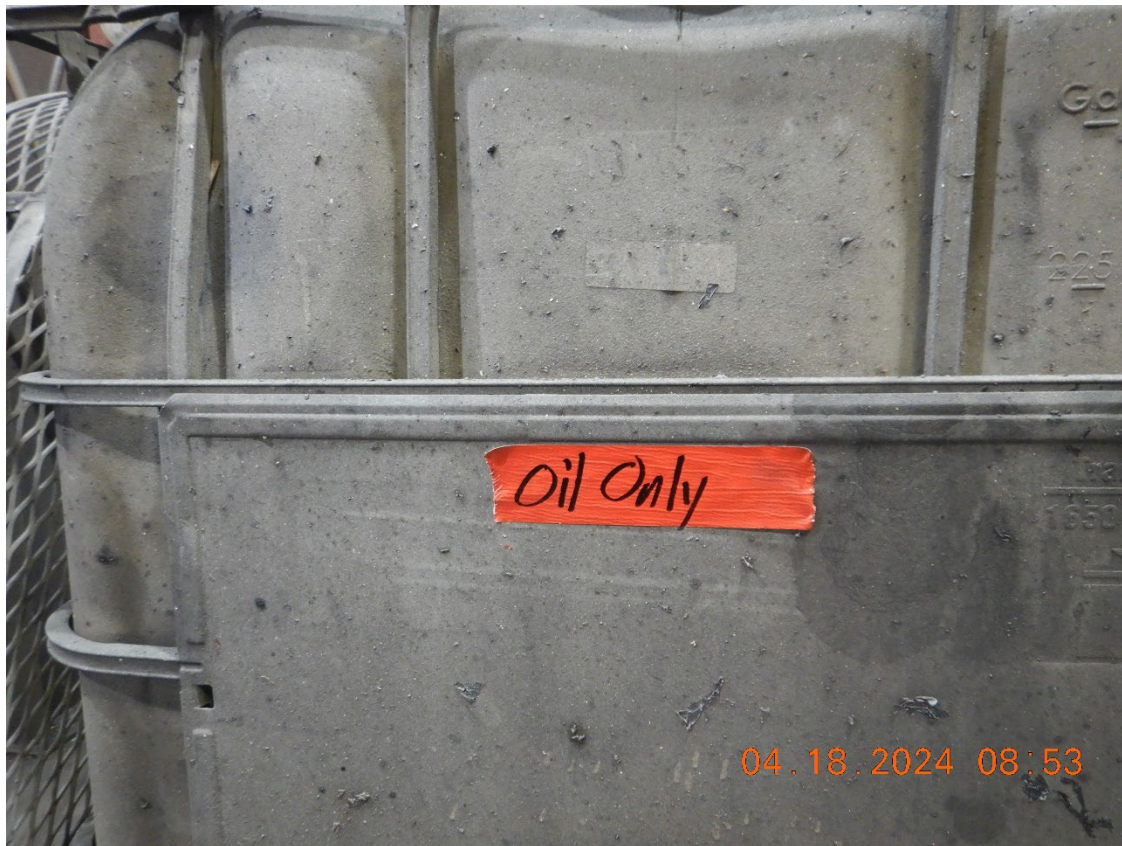


Photo File Name: DSCN7184

Date of Photo: 04/18/2024

Time of Photo: 08:53 hrs.

Photographer: Anshul Paripati

Description: Closeup of "oil only" label on used oil tote in Devall's diesel services building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Southern Devall		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7185

Date of Photo: 04/18/2024

Time of Photo: 08:56 hrs.

Photographer: Anshul Paripati

Description: Antifreeze tote labeled as "Coolant only" in Devall's diesel services building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Southern Devall		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7186

Date of Photo: 04/18/2024

Time of Photo: 08:56 hrs.

Photographer: Anshul Paripati

Description: Closeup of "Coolant only" label on used antifreeze tote in Devall's diesel services building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Southern Devall		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7187

Date of Photo: 04/18/2024

Time of Photo: 08:57 hrs.

Photographer: Anshul Paripati

Description: Used oil tote labeled as "oil only" in Devall's diesel services building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Southern Devall		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7188

Date of Photo: 04/18/2024

Time of Photo: 08:57 hrs.

Photographer: Anshul Paripati

Description: Closeup of "oil only" label on a used oil tote in Devall's diesel services building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Southern Devall		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7189

Date of Photo: 04/18/2024

Time of Photo: 08:58 hrs.

Photographer: Anshul Paripati

Description: Overview of tote for waste oil with a drum lid acting as its cap in Devall's diesel services building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Southern Devall		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7190

Date of Photo: 04/18/2024

Time of Photo: 08:58 hrs.

Photographer: Anshul Paripati

Description: Closeup of a drum lid acting as a cap for a tote for waste oil in Devall's diesel services building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Southern Devall		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7191

Date of Photo: 04/18/2024

Time of Photo: 09:03 hrs.

Photographer: Anshul Paripati

Description: Used oil rags container labeled as "oil rags only" in Devall's diesel services building.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Southern Devall		
City: Sulphur	County/Parish: Calcasieu	State: Louisiana



Photo File Name: DSCN7192

Date of Photo: 04/18/2024

Time of Photo: 09:03 hrs.

Photographer: Anshul Paripati

Description: Closeup of "oil rags only" label on a used oil rags container in Devall's diesel services building.

APPENDIX 2.
FOLLOW-UP EMAIL FROM SOUTHERN DEVALL

RE: Follow-Up from EPA Inspection 4/18 (Southern Devall)

Carlin Chapman <c.chapman@southerndevall.com>

Thu 2024-05-02 11:45 AM

To: Cameron Tanaka <Cameron.Tanaka@erg.com>; David Devall <d.devall@devalldiesel.com>
Cc: Anshul Paripati <Anshul.Paripati@erg.com>; Joe Watson <Joe.Watson@erg.com>; Pham, Elizabeth
<Pham.Elizabeth@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; Pandak, Debra (she/her/hers)
<Pandak.Debra@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>; Mikey Devall <m.devall@southerndevall.com>; Bob
Thomas <b.thomas@southerndevall.com>

 12 attachments (829 KB)

Waste Manifests.pdf; Used Coolant.jpg; Used Oil Paint Dept # 2.jpg; Used Oil Paint Dept.jpg; General Waste Shop #4.jpg; General Waste Shop #2.jpg; General Waste Shop.jpg; General Waste Parts Dept.jpg; General Waste #3.jpg; Used Oil Container.jpg; Battery Storage Area.jpg; General Waste #2.jpg;

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

Cameron,

Please see the attached requested documents from your site visit a few weeks ago. We've got proper labelling on all containers in the shops as shown in the attached photos.

If you need any additional information, please let us know.

Also, please provide written confirmation that all identified non-compliance issues have been addressed and the audit loop is closed.



Carlin R. Chapman, CHMM

Executive Vice President – HSSE & Compliance

Office : (337) 905-3551

Mobile: (337) 540-1606

Email : c.chapman@southerndevall.com

2244 Swisco Road
Sulphur, Louisiana 70665

www.southerndevall.com

<https://linktr.ee/southerndevall.com>

From: Cameron Tanaka <Cameron.Tanaka@erg.com>

Sent: Thursday, April 18, 2024 7:34 PM

To: Carlin Chapman <c.chapman@southerndevall.com>; d.devall@diesel.com

Cc: Anshul Paripati <Anshul.Paripati@erg.com>; Joe Watson <Joe.Watson@erg.com>; Pham, Elizabeth
<Pham.Elizabeth@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; Pandak, Debra (she/her/hers)
<Pandak.Debra@epa.gov>; Thapa, Sandesh <Thapa.Sandesh@epa.gov>

Subject: Follow-Up from EPA Inspection 4/18 (Southern Devall)

Caution: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Carlin and David,

I am following up with a list of items and notes from our inspection today. We would like you to send us:

- Your most recent manifest for used oil
- Your most recent manifest for paint stripped from engines
- Your most recent manifest for fluorescents
- Your most recent manifest for parts washer fluid
- Your most recent manifest for batteries
- Your most recent manifest for used coolant

Additionally, we had the following observations. If you have any responses, clarification or documentation of corrective actions, we ask that you provide those to us as soon as possible, and we will incorporate those into the report (ideally within two weeks to be included in the report).

- Used oil tanks and drums were labelled as "oil only" instead of "used oil"
- Used coolant was labelled as "coolant only" rather than "used coolant". These also were not dated.

Again, thank you for taking the time out of your day to meet with us. Please let us know if you have any questions or concerns, or if you would like any guidance on how to work to address these observations. Any follow-up can be sent to myself, and the persons attached.

Thanks,
Cam

Cameron Tanaka (he/him)

Eastern Research Group, Inc.

cameron.tanaka@erg.com

Cell: (508) 314-6432

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.

APPENDIX 3.
FOLLOW-UP PHOTOGRAPHS FROM SOUTHERN DEVAL



Trash Only

**GENERAL
WASTE**

Small Detail	
Phone Hold Back up	

GENERAL WASTE

**GENERAL
WASTE**

GENERAL WASTE

**GENERAL
WASTE**

GENERAL WASTE

















APPENDIX 4.
SOUTHERN DEVAL WASTE MANIFESTS

COPY

~~ORIGINAL~~
INVOICE



Action Oil Services, Inc.
P.O. Box 2428
Beaumont, Texas 77704
United States

4098322663
www.actionoilservices.com

BILL TO
Devall Diesel Service - Sulphur
2244 Swisco Rd.
Sulphur, Louisiana 70665
United States

337-905-3520
k.brown@devalldiesel.com

SHIP TO
Devall Diesel Service - Sulphur
2244 Swisco Rd.
Sulphur, Louisiana 70665
United States

337-905-3520

Invoice Number: 3366

P.O./S.O. Number: Verbal

Invoice Date: April 18, 2024

Payment Due: May 18, 2024

Amount Due (USD): \$350.00

 Pay Securely Online

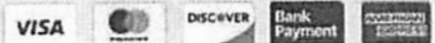
Description	Quantity	Price	Amount
Barrels of used oil filters	4	\$50.00	\$200.00
Barrels of used oil absorbents	2	\$75.00	\$150.00

Subtotal: \$350.00

Total: \$350.00

Amount Due (USD): \$350.00

Pay Securely Online



link.waveapps.com/w7987d-329shp

INTERSTATE BATTERY OF ACADIANA
P.O. BOX 62227
LAFAYETTE LA 70596-2227
(337) 233-7070



Page 1

DEALER NBR. 4000
DEVALL DIESEL SERVICES, LLC
2244 SWISCO RD, *
SULPHUR LA 70665-8220
(337) 905-3520
Payment Type: CHARGEACCOUNT

Invoice Nbr :70019849
Location of Sale :T07
Sales Person Name :MATT FOIST
Sales Person Nbr :MAT
PO Number :LAPO025249
Date :3/28/2024
Time :10:02 AM

Type	Qty	Part Number/Desc	Age	Rate	Price	Amount
Sale	12	SC34U			216.95	\$2,603.40
		Sales Total				\$2,603.40
Cores Received	2	ATCORE				
Cores Charge/Credit	10	ATCORE				\$160.00
		Sub Total				\$2,763.40
		Invoice Total				\$2,763.40
		Invoice Payment Amount				\$0.00
		Net Invoice				\$2,763.40

PRINT NAME HERE :

Robert

SIGNATURE

Robert



PROTECTION CHOICES-PEOPLE
MAKE GREEN WORK

SAFETY-KLEEN SYSTEMS, INC
42 Longwater Dr.
Norwell, MA 02061

DUNS NO: 05-397-6551
FED ID NO: 39-6090019

INVOICE

Page 1 of 2

Billing Account #	Service Account #	Invoice #	Invoice Date
DE42935	DE42936	92909849	10/06/23

Billing Address
DEVALL DIESEL SERVICES INC.
2244 SWISCO RD
SULPHUR LA 70665

Service Address
DEVALL DIESEL SERVICES INC.
2244 SWISCO RD
SULPHUR LA 70665

Branch Location
ORANGE, TX (BEAUMONT) SVC

Terms
Net 30 Days

For Questions Call:
409-886-8365

Service Date
10/04/23

PO Number	Department #	Department	Tax Status/#				
QUANTITY	PART#	TERM	SERIAL/PROFILE #	UNIT PRICE	UOM	SALES TAX	TOTAL
1	100005	24		\$71.5160	EA	\$7.29	\$78.81
	CHEMISTRY FEE						
1	100030	24		\$120.4500	EA	\$12.29	\$132.74
	RECOVERY FEE						
1	30520	12	15906832	\$150.5600	EA	\$15.36	\$165.92
	30G PARTS WASHER - SOLVENT						
1	30520	12	15906830	\$150.5600	EA	\$15.36	\$165.92
	30G PARTS WASHER - SOLVENT						
1	30520	12	15906833	\$150.5600	EA	\$15.36	\$165.92
	30G PARTS WASHER - SOLVENT						
1	30520	12	15906831	\$150.5600	EA	\$15.36	\$165.92
	30G PARTS WASHER - SOLVENT						
1	30520	12	15906829	\$150.5600	EA	\$15.36	\$165.92
	30G PARTS WASHER - SOLVENT						

SUBTOTAL \$944.77
TOTAL TAX \$96.38
CURRENT AMOUNT DUE \$1,041.15 USD

Interest will be charged at a rate of 1.5% per month for all past due amounts.



SAFETY-KLEEN SYSTEMS, INC
42 Longwater Dr.
Norwell, MA 02061

Billing Account #	Service Account #	Invoice #	Invoice Date
DE42935	DE42936	92909849	10/06/23
PLEASE RETURN THIS PORTION WITH PAYMENT. MAKE ANY ADDRESS CORRECTIONS BELOW.			
Current Amount Due		Date Due	Total Amount Due
\$1,041.15		11/05/23	\$1,041.15

00092909849000DE42935000001041158

000000 1
DEVALL DIESEL SERVICES INC.
2244 SWISCO RD
SULPHUR LA 70665

Safety-Kleen Systems, Inc.
P.O. Box 975201
Dallas, TX 75397-5201



PROTECTION CHOICES PEOPLE
MAKE GREEN WORK

SAFETY-KLEEN SYSTEMS, INC
42 Longwater Dr.
Norwell, MA 02061

DUNS NO: 05-397-6551
FED ID NO: 39-6090019

INVOICE

Page 2 of 2

Billing Account #	Service Account #	Invoice #	Invoice Date
DE42935	DE42936	92909849	10/06/23



NOW ORDER THE PRODUCTS YOU NEED ONLINE.

Shopping for Safety-Kleen products has never been easier. Shipping is FREE when you add the delivery to your next scheduled service.

Explore our products at store.safety-kleen.com

Comments:

Standard payment terms are Net 30 days from invoice date. To maintain a positive credit history, payments must be made within approved terms. Late payment or other deviations from approved terms may cause service interruptions and initiation of collection efforts, and may result in late fees, interest, and collection costs.

Please note a delivery document was provided at the time of service for this transaction. If the delivery ticket was paid, this invoice may be for your records only.
Payment Options:

ACH: Please send remittance details for all electronic payments to: cash.department@safety-kleen.com.

Pay Online: Go to www.safety-kleen.com and click on the Customer Portal link at the top of the page.

Pay by Check: Remit payment using payment coupon.

Please be advised all payments must reference the invoice number or your account number.

Devall Towing & Boat Serv	Vendor	Vendor ID	Payment Number	Date	Check Number
	GREG BLANCHARD ELECTRIC, I	GBE01	00000000000091153	12/14/2023	EFT000000016564

Invoice Number	Date	Description	Amount	Discount	Paid Amount
27409	11/06/2023		\$635.34	\$0.00	\$635.34
27426	11/16/2023		\$1,494.62	\$0.00	\$1,494.62

TOTALS:	<u>\$2,129.96</u>	<u>\$0.00</u>	<u>\$2,129.96</u>
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Devall Towing & Boat Service
2244 Swisco Road
Sulphur, LA 70665

BMO HARRIS CENTRAL N.A. 70-1558/719
ROSELLE, ILLINOIS

Dec 14, 2023	FT00000001656
DATE	CHECK NO.

Pay Non-Negotiable: Amount transferred Via Electronic Funds Transfer \$0.00

to the Order of:

GREG BLANCHARD ELECTRIC, INC
120 BAYOU BEND DRIVE
SULPHUR, LA 70665

VOID

Non-Negotiable

Devall Towing & Boat Serv	Vendor	Vendor ID	Payment Number	Date	Check Number
	GREG BLANCHARD ELECTRIC, I	GBE01	00000000000091153	12/14/2023	EFT000000016564

Invoice Number	Date	Description	Amount	Discount	Paid Amount
27409	11/06/2023		\$635.34	\$0.00	\$635.34
27426	11/16/2023		\$1,494.62	\$0.00	\$1,494.62

Appendix 4 Page 5 of 5	TOTALS:	<u>\$2,129.96</u>	<u>\$0.00</u>	<u>\$2,129.96</u>
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