

**From:** [Weiss, Kevin](#)  
**To:** [Clovis, Debora](#)  
**Subject:** FW: Final Strategy for Responding to Iowa League  
**Date:** Wednesday, February 26, 2014 1:43:00 PM  
**Attachments:** [Strategy for Responding to Iowa League 2 19 14 draft.docx](#)

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Debora:

Here is the strategy I mentioned that talks about the experts workshop . . .

Kevin

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**From:** Nagle, Deborah  
**Sent:** Wednesday, February 19, 2014 1:56 PM  
**To:** Weiss, Kevin; Pollins, Mark; Theis, Joseph; Denton, Loren; Vinch, James; Bosma, Connie; Witt, Richard  
**Subject:** Re: Final Strategy for Responding to Iowa League

Good. Now let's put this w pager down and move on to the important effort of organizing a panel discussion on health impacts.

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**From:** Weiss, Kevin  
**Sent:** Wednesday, February 19, 2014 1:09:41 PM  
**To:** Pollins, Mark; Theis, Joseph; Denton, Loren; Vinch, James; Nagle, Deborah; Bosma, Connie; Witt, Richard  
**Subject:** Final Strategy for Responding to Iowa League

Here is the final version of the strategy – [REDACTED]  
[REDACTED]

### Strategy for Responding to Iowa League

Direction to take inside 8<sup>th</sup> Circuit: Permits for POTWs that blend must:

- Have a bypass provision that is at least as stringent as EPA's regulations at 40 CFR 122.41(m),
- Clearly identify the treatment train that will be used during dry and wet weather,
- Will not have internal permit limitations (unless end-of-pipe effluent limits are impracticable),
- Require monitoring to yield data that is representative of the monitored activity (see 122.48(b)) (permits should clearly specify end-of-pipe compliance monitoring during wet weather),
- Provide percent removal requirements according to the secondary treatment regulations, and
- Meet water quality standards.

Direction to take outside 8<sup>th</sup> Circuit: EPA would continue to apply its historic interpretation, that bypasses are prohibited by the CWA unless a NPDES permittee can meet all of the following criteria:

- The bypass was "unavoidable to prevent loss of life, personal injury or severe property damage";
- There were no "feasible alternatives" to the bypass, and
- The permittee must have submitted notice of the bypass to the director of the permitting authority.

On a case-by-case basis, a permittee will be considered to be implementing all feasible alternatives if it is implementing an adequate CMOM program, including an acceptable I/I program, is in compliance with pretreatment requirements, and for any bypass around secondary treatment:

- There is side stream treatment that meets an acceptable level of treatment (e.g., significant solids removal);
- The recombined flow meets effluent limits, utilizing representative monitoring during dry and wet weather; and,
- Flows to the secondary treatment units are maximized.

Note: There was general agreement at the 2010 workshop on this approach to blending.

EPA would hold a workshop with public health and engineering experts to ask questions about the public health implications of blending:

- OECA and OW would agree on questions to ask the panel of experts and would send these questions to them ahead of time. The questions would cover effluent from full secondary treatment as well as blended effluent and other discharges during peak flow events (including bypasses that are not blended) with and without side stream treatment.
- The workshop would be facilitated by a professional facilitator.
- Purpose is not to seek consensus but to solicit individual views – so it is not a FACA.

Depending on the outcome of the public health workshop, we could:

- Implement the approach that was generally supported at the 2010 workshop (see discussion above);
- We could hold another workshop of representatives from states, municipalities, NGOs, WEF, etc to review the findings from the public health experts workshop and to review the outcome of the 2010 workshop and provide individual views on the steps that should be taken in wet weather events to protect the public from inadequately treated wastewater;
- We could maintain our historic interpretation without any change; or
- Adopt one of the previous draft blending/peak flow policies.

The next step depends on the recommendations. It could be a policy or a memo to the regions.

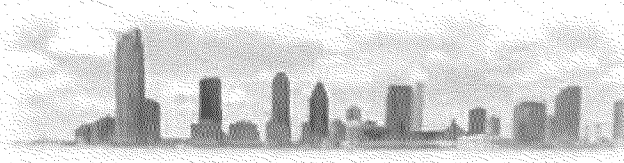
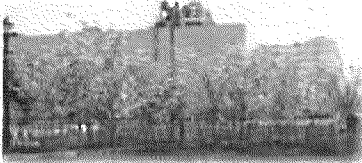
Communicating our Strategy: We could respond to the US Conference of Mayor, et al letter by summarizing this strategy or we could send a memo to the regions.



# DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF WATER QUALITY



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### For Permittees

- Individual Permits
- Submit Schedule
- Minimum Controls
- Community Collaboration
- Long-term Controls
- Integrated Planning
- Guidance and Resources
- Financing
- Weather Demonstration
- Join our Email List

### Individual Permits

In March 2015, the Department is initiating individual discharge (IDSD) permits. The permittees are to report a proposed water treatment infrastructure system to the Division of Water Quality for review and approval. The goal of the IDSD permit is to meet the requirements of the Water and Wastewater Pollution Control Act and the Clean Water Act. The IDSD permit is a key component of the Department's strategy to improve water quality and protect public health. The IDSD permit is a key component of the Department's strategy to improve water quality and protect public health. The IDSD permit is a key component of the Department's strategy to improve water quality and protect public health.

The Response Comment Document is reviewed.

The Department is inviting all permittees to establish a direct line of communication with the Department. The Department is inviting all permittees to establish a direct line of communication with the Department. The Department is inviting all permittees to establish a direct line of communication with the Department.

Permittee	DEPTeamLead
Camden County Municipal Utility Authority The City of Camden The City of Gloucester Trenton Sewer Authority	Adriana Caldarelli <a href="mailto:Adriana.Caldarelli@dep.nj.gov">Adriana.Caldarelli@dep.nj.gov</a> 609-984-3660
Middlesex County Utilities Authority The City of Perth Amboy Bergen County Utilities Authority Fort Lee Boro Hackensack City Ridgefield Park Village The Joint Meeting of Essex and Union Counties The City of Elizabeth	Nancy Kempel <a href="mailto:Nancy.Kempel@dep.nj.gov">Nancy.Kempel@dep.nj.gov</a> 609-292-4860
North Bergen Woodcliff STP Town of Guttenberg Adams Street WTP River Road WTP	Joe Mannick <a href="mailto:Joe.Mannick@dep.nj.gov">Joe.Mannick@dep.nj.gov</a> 609-292-4860
Passaic Valley Sewerage Commission	

Bayonne City MUA  
 Jersey City MUA  
 City of Newark  
 North Bergen Township MUA  
 East Newark Borough  
 Harrison Town  
 Kearny Town  
 Paterson City

Dwayne Kobesky  
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 609-292-4860

Contact DEP in your city/legislation/directly/submit

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 Statewide Home Services Departments / Agencies

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 Department of Environmental Protection  
 P.O. Box 402  
 Trenton, NJ 08625

March 2015



**9 6 C O M M E N T S** : e c G i . 4 n . æ u v h i d i M I E U C a v a l C u S a t y p a p e h N e a t i o n a l  
C S O l a c y n e f h L C l t e r n t a h t e i a v s e h e d w e v e d i c a t e s t h a t s u  
o p t i i o u r r e n d i j b y s i t t e a l o i t s o a t p p a w l e y n t o i p s t i i o h l o t w e e d  
a s s e s t h e d e p a r s m e d e d e w h i e r t h e i s r a d d e p s t e a d w a s i n t e n d e d  
t o e s o p t o t h e a w i t s e o r m i z e d b y t h e e d N a a l C S O p o l i t i c y  
p r o p e b t e i a [ 9 ] .

**9 7 C O M M E N T** : e g a r t d h e n y r e o r a f d a c i s l e i v e l y i s b l o p i t g e r e s e n i t y  
a l l f o o w n c r e s e l e p w o c e a s a d i v o g i d a p n u c e l x i p o s o m e r e a t e d  
w a s t e w a o t e e r n M U C c o m p l i a l o t C o p m p l e m e i n t h a e i m e f i a s e h i o e n ,  
a b i t l i m p y l a C S O y p a s s i m p l y a p p e i t a b l l i e m f o t f r i c i u m e t d  
d i s c h e h t e d R o i n v s h r o b e d a r [ 2 5 ] p d .

**9 8 C O M M E N T** : h e i o y E l i z a b e t t h f e l m a x M i E n U i o v l e a t a k e l s a c t e  
J M E U C a s h a g n i i f m i p c a p n o t t h C e i t h e r m i t s h c e o n v e y a p a b i d h e i e s  
T r e n A v e n p u e m s p t a a w e a n r r e e g u l b o r d o w h e c a d i s c h a h g e e f o r e ,  
w e h a v e e s i t e t e i n e l s e n l e i o a j u s i d a v e i m p a d t h e o C e i l t i y z a [ b 8 ] e t h .

**9 9 C O M M E N T** : h e p a r s m e o d d s a i d d e a r d g i t i o f n a d n e a t t i o n a l  
P o l i t i c y f p r e h e P a l f V . G A s t a i t e h N e a t i o n a l C S O a p p o r l o i v c a y l ,  
o a C S O r e l y a t e n d e o n g C S O r o m p i t a t a m i n i m u m , u l d p r o v i d e  
j u s t i f o a c a t p o r a w i t h i c f l o w e d i v e f r t o n s e e c o n t r a e r a y t m e n t  
p o r b i f o t e r e a p r h a a n t p , r o v a b e a e f a t h a d d e s m o s n s t h a d r i v e y a n c e  
o w e w t e a t f h e d n h P e O T W q p r r i m a r r e y a i n s e r o b e n e f t h o i n a C S O  
a b a t e a m l e t r e s a a s i v e s a n g l e m p a d l o s r e c o n t r a e r a y t m e a e p a s a w e o n ,  
o s a t e t l r l e i a t t e m e 8 n 6 t 2 7 3 V d I 9 n , o 7 . 5 ) l . n h D e r a p f e t r i n a S h e t h e ,  
D e p a r s m e t h e a t " e N a t P o r d e r t y o u p r a g r e i t o t o e n e s i h o s e a b y p a s s  
o s e c o n t r a e r a y t m h e e v a l u a t l i t o e n r n a t t s o v a e c . " u t r o a t s e a l y l o w s "  
r a t t h e a r e n c o u [ 5 ] [ 1 e 1 s ] . "

**1 0 0 . C O M M E N T** : a S h e a l t s o t t e h a J r e g u l p a r t i o h y p i a t s s t a t t h e a s t e  
D e p a r t m e n t t h a t h e a v e o u n l e e d e m o d i f o e d e a r l b o y p a s s e s  
p a r a p p r b T v C e P U r d 4 C F R 2 2 ( . 1 4 4 ) b y p a s s o h i b u i t t h r e u d l , e  
p r o v i d e s f o r d e i n s e c n w h e t i t o p e r m s h o w t a h b e y p a s s n a v o i d a b l e  
t p r e v e o s i p e r , s i o m j a u l e y v e r r e p e a r m t a y d e p s e ; r m s h o w t a h t e r e  
w a s o f e a s a i l b t l e e r t n a h b e y p a n t h p e e r m s t u b m e t t h r e e q u n i o r t e i d c e .

T h e a S h e s e t t a u t n e d s e h E v a l u a t l i t o e n r n a t t i r v d e s t r m D e p a r t m e n t  
c o n s a b d e p a a s e a s a i l b t l e e r . n . a . h i s e a c c T u h r e a t s e h e s t o s t a t i e n ,  
o r d f e d r y p a s t o i o g n s i i h e u s e t e l e m o n s t t h r a t t e e n d e f e a s i b l e  
a l t e r h a y p a s s . "

T h e n f e a s a i l b t l e e r a a a l s y h e o b s e d o c l i u n d e t C P T . h N e a t i o n a l  
P o l i d e s y c w h a t e a s a l s y h o i e s t d i a m i o l r d e t 5 [ 1 1 1 . ]

**RESPONSE 1001:** I e t t o e h D e e p a r t m e n t o c c u r r e n c e o f 1 8 6 9 3 a - n d 4 c a s e s . F o r 2 . 2 . 4 A ( s m t ) a . t e d :  
C h i o e f P A R e g 2 6 n e w a n t R e g u l a t o r y c o m m i t t e e n o n p r i m a r y  
a n d c o n t r a c t e d t o s e e t x i s e t f i n l u i e n n i t t a t i e n i s o t w h e r e a C S D  
p e r m i t t e r o p s o a t i l s f a e d e s e b e r l a e d . C f . h C e S C o n P r o o l 1 5 0 y ,  
F e R e g 1 8 6 9 3 a - n d 4 c a s e s . F o r 2 . 2 . 4 A ( s m t ) a . t e d :

" N J D n e P r o v a r e e p e h a i r n s t e e i s s u e t h a t e a r d l i t h e e r m o t  
b e e o p e a e l d a n g a p p e c a C S O g e l a y p a s i s p e t h n e i s t u b e n e i j t s  
i n f o r m a t i o n a t t h a t r e e r g u i r i e n t o f R 2 2 ( . 1 4 ) ( h i a ) b e e n e t .  
I f h p e e r m i s i e t o p e n n e c d i a n d e d l a p d e a p p r o v t h e d e p y p o a s d  
n e e d e c t o n d i f t o w r o e a n d o w r a p p r b y p w e a d d c u r . "

I f h p e e r m i n t o f e a s a l l b t l e e r a a a l i s y s o v s t a l t e n w d i u n g e l p p r o p r i a t e  
d u r i n g o t e h r n e s r r a n a f , e x a m i n a n d n e e r s f e e d e e s p a r t m e n t  
w i d d n s a m d e j p e r r m o d i f i t c a a l t i a b e n v i a n d e n N . 7 J : 1 A 4 A C . 2 3 . 2 ( b )  
f r d r p e r o h i a g i a t i r o n a s a n p y o g b i f d t e r e a w r e a n s . J . A . C .  
7 1 4 A - 2 3 ( n i ) C r S T P s h e p a r t m e n t a n a r w s o t u h d i s n s h e w u t e  
i n f o r m a t i o n e t h e s e i b e f N i a . A . C . 7 : t h e A c e n o s . t 4 c ( b u ) s e r n g  
m a j m o r d i f i o c r a e t v i o c a a n t d i e n e o w a p e r m i t .

U n d e r J . V . G . o f e C e S O e i r r a p a o t i h e T C P e r m i a t r e e e s t i o r e d  
e v a l u a t t e e n a v e i a t t e r e a p t m e n t o r o e l d s u C S a g e l y n a x i m i z i n g  
t h u e s e p r i m a r r e y a t r a e a a t i h e t P m e d t n e a t i 6 5 0 b l i g c o y a ' f s  
m a k i t n g e r e a u t s e e s i s i e n x g i s p t l i a n g t f r a s t S r p u e c t i u p r i e c a n l i s t h y a e l e s  
a l e s w a l t u h e e a s i o b i s l i n t h e l a e x c e s s m a r r e y a t r a e a w i t t h y  
d i s i n a a d d e t c i h o l n o t o m a r t h e a e n e w o p t r i m a r y f t o f r e a t h s a e t n t  
w o u l d o b e e d w s t h e a C S O h i s l t e i d e t t i h e t P e ' f s f l u e n t  
l i m i t a t i o n s .

A l t h o b f g a h 6 h e e f s D e r a p e t r n s i t t a s h a t r e u d N . J . A 1 : 4 A - 1 2 ( 3 m )  
w o u n e d e t h e n o d i f a e d b o y p a s s a e s a r a p p r b v e P h D e e p a m t h a e  
r e e v a t i h e a s t e a c h a v e u t h a n e x e m p i t a l l o l n o w a n d N e a J . A . C .  
7 1 : 4 A - 2 3 S 2 ( a b l ) t e r n e a t e a v t t e r e a p m e n t m a g n i s e o n s i f d e r r e d  
S T P t s h a e t c e o m e i s r e e v e l r o t w o s e e t h e t P e ' f s f l u i e n n i t t a r t n d a o g n n s l , y  
b e r a r a t a n d d i f i t o a h p e l a 6 5 0 s P D f e r m l i e t u c l a s t e h e t P  
p e r m i t a t a p e p s l o y h D e e p a r t m e n t o d i f i t o a n t c i l s u n d e e i f i c  
c o n d i w t h i e n h e s n r d a n e g l l o w n e d . J . A 1 : 4 A 6 - . 4 n - d 2 3 . 2 ( b ) .

N . J . A 1 : 4 A - 1 a 3 p . 1 2 i e s j u t e s o t d s w e y t e a t e h f e r l l u i e n n i t t a a n t i d i s o r t s  
a d d r e s t s h e e s N J P D f e r n a i n d e q u c i o r n e s s i d e f r a d t i i t o m o i n t a e l r i a  
d e s c r i b r e u d l e .

N o c h a n g a e l s e e n i n d a h f e e r p a e l r m a a r ( e s s p u f l h t e c s o e n m e n t s .

**100 COMMENT:** I a r i f i i s c e a t o i a c h p e o t e n a t u i t a h l o d r y i s z c e h d a c a e o o n s  
J M E U S e v e l r i a s l o p i t g e r e s e n t a y l f e o w m i s t e S S e l d w  
p r o c e a s n d i v r o g d a p n u c e d x i p o s a m e r w a s e d w a o t n e o r g e f h e s e

po i n s t u s t h o b r y t i h e r o f e t r m t i o e n s N M C c o m p l a a l t c e  
i m p l e m e n t h a e f m e f i a s e t i h a e b i t l e m y l a C S O y p a e e E e l i z a b e t h  
R i v s h r o l e d l o [w e ] d .

**RESPONSE:** h i i l i e s r e m a t e u r a e l a C a S O e o n a r l d e r i n n a d t e i p v e e r f d e n t  
t h c e o m p l l t e C t P e a p p e t a n s p e e r m i s e e e e t s h a i n d e e p a r t m a a t d e r  
C S O y p a e e E e l i z a b e t h o w e v i e t u n c l a s a w h e t o h n o t t h s i u g g e s t e d  
b y p r e s b d o u t e p d e r m o t u t e d e a l t e r d n i a s t c i h v a e c g e i o n n o t  
c u r r a e m t h g i r t i n z e R I D E S O e r m i t .

W i t r e s p e d i e s s u b e l e n p l a n o s e b a l t e n d i s i m g e n t e d i l a i t z h e d  
e x i s t i n g f a r t o e n p l i a a e x i v i t P D E S p e r m i i t s e p c a u r i a m e e d t e r s  
A n g l t e d i n s a c t e a c g u e i o u r e d q a u t e o r t i h z r a a s i o p n a r J P D E S  
p e r m i t i o n a l t i d e e n v g e l o o p i n h a e p p r o p i r m a a t e s a W Q M P  
a m e n d m e n t u b j e c t t r a n s e g u l a t i o n s .

N o c h a n g a e v e e n a d t e d h F e i r p a e l r m a a r ( e s s p u l h t c i o m m e n t .

**102 COMMENT:** h e r e a s b a e e n m a e d e y E P A n d i t t o d t h c e o u i m t o w a  
L e a g e t v i E P S A , 1 F . 8 4 ( 4 8 C i 2 1 . 0 s 3 t ) a h a t f e e d e y p a s s e ' s  
p u r p o s e e n s t h a t e r r s o p e r l a y n n o a p i e n t t a t i e n e a f m e n t i t i e s  
[ p u r s a p p l i c a t i o n e t l e y c i m g o l o s g y a n d a s r e s q , u " i m c o r d l o y s  
t m o v t e h r o t u h e a c a s i w a d e s i g n e p e r a n t e l ' t j m e o e r g e e n e r a l  
s e c o n d a r y t r a g o t a h b e y o p n a s s , d e e s o r t e q u h u e s e a n p a r t i c u l a r  
t r e a t m e n t d e c h n o W o t h p e e ' r e n f i t l l u i e n n i t t e a s t t i a o b n t s h e h i n g  
t h r e s b t h l e e v o f l r e a t r e q u a s e a d g h b e l e n e d f e f d m u e e n t h e e r m i t  
l i m i t t o s u n d l i f a u n d t e n e J A . 7 C 4 . A l - 2 3 . p 1 r 3 o ( h m i ) o i t r h i e p p a s s  
p r o v i s i o n . [ 2 5 ]

**103 COMMENT:** h o w o e s e e m e r g e i n s c y h a r g o f p n e b R D E S i n e n t h e  
d e c i s i o n o n a e a o t v i E P S A , 1 F . 8 4 ( 4 8 C h 2 0 1 a 3 p ) p a l t y h P S O E W s  
f o p r e a k m a n a g e o n e t s t h f e e d e r d o l y p a s s e c e d [ r 2 e 5 ] ?

**104 COMMENT:** f N H S A r t o o m b t i h e e x i s o t o 2 m o d i s c h t a e r n g s e f u r e l  
d i s i n a e d f i e o e s e a c r h y l o r a i n t a e i n e o t h a c e o g n e b i f n e o u s t h e  
e x i s o u i t i n g a S A v o u b e l r i u c l o l m p l w a t h e e x i N t P D E S m i t a t i o n s .  
U n d e r a e a o t v i E P S A n b d a s u e p d r e p a r p m e n e t h e i n s e p t  
c o n s a i b y p r a e s i r t s h e a r t f e d e a w [ 1 2 5 ]

**106 COMMENT:** u r t i m e s r i g a e e d o w h e e m e r g e i n s c y p a o g e o s f i h o e n s  
N J P D E S N e s t , i O S O b l a c k y o v l a e a g a s e a f f e l o y p m g e v e s l e o r a s  
a p p l i t o a t P i l s e t e v r i a d n t d e r a t l i l f o y p a e l k e w a n a g e a m p e n r t o a l t h e s .  
w o u l d e t n h a t e i g e r e a t e s t i f o r a p e e s k o w s g i v l e n a g u e l o w a  
d e c i s i o n a n i f w i o u a t i z o m s i d r e s a b i l a e d e s e l s t c o r b j e c t i v e s .  
[ 4 8 ]

**RESPONSE** - EPA by pass rule. F § R2.2. 4wla (sp) h e h d  
e a r f l e e r p p e d e a t i s N R D C E P A 8 , 2 E . 2 0 4 D . C C i . 1 9 8 E P A  
m a i n t a i n t h e c i s i n i o w a a g u l e i v E P A s 1 F . 3 4 ( 4 8 C h 2 0 1 i 3 a ) t  
o d o s i t h D e . C i r c l u d i n g s t r a n d i n g A b s p a s s a r e P A a s  
d e t e r m i n e d u a a g u l e i s s i n o a n p l i i t a h e i C e i r c u d t .  
d a f e t , t h r e e m a i n t h e a t i o n t h e t h i r c i u n i t e n t d i o v e a f l a y g u n d  
t r e a p m e n t s i s e s n s i a p e r o h d i b b y i p t a e d s e s s o n t h i c t i C o n F § R .  
1 2 2 ( 1 4 ) r s e a t i s t f h i p e d l w a s e i t e a a e t h e C o c d t o 9 b 2 e 0 r 1 f 4 r , o m  
K a A e d e r C h o i e . I f e v a n t R e g u l a t o r E o p h R , e g 2 o r e s p o n s e s i i m g i l a r  
r e q u i r e s P M S C M . s A n d e r b e t i s e r i t h a e d m i n i s e c a t d v e

M o r e o v e r , i f h e C A A p r o v i d e s a t i v e s u p e r j e s s e i n g e n t  
f e d e e g u l a t i o n s § 1 3 7 . T h e p a r t n e r s ' s l w e h s i a t h e  
p r o m u l g a t e d e r s a p y C ' A s . J . 5 8 C A A e t t ' m a y e s o p i r o t h i b i t  
b y p a s s i n g u m s t h a t g e t t h e b o y e s r e n i s s d f e e d e r a l l a w .  
P e r m i t t e e q u a t i o n p l y t h e o r s e t r i o n g l e f e e t d e e g u l a r t d i h o e n s  
D e p a r t m e n t l ' a e t f a b r y e p a s b e p a r n i P t e a s e **RESPONSE**  
**95 - 100** c D o d r R e e s p d o s m e c h o t c s u m t e

N o c h a n g a e v e e n a d e o h F e i r p a e l r m a a r ( e s s u f l h t e c s o m m e n t s .

**106 COMMENT:** I e n b a t s h e o t e n p r i a v i m d e e d e i n a v t i e r o a m p l u n t l a i l c  
h e a b l e t h e f o i h t e e c a m m u n i a t y c o r v a t h e d e a t a i l 0 8 0 b l i c y .  
A n e c e s t s h a e p a r t m e g r i d a w a i v e r J . A 1 : 4 2 3 . 1 3 ( a n d ) d r e s s e s  
f a c d e s i g n o c o m p l i g i o s a W e r e q u e d e t p a r t m e p a u t h s a l u o a f t i o n  
t h e i s s e p u r e i s o h f e i n a b i f z h D i r s g f e t r n ( 2 5 . ]

**RESPONSE:** I t h o b f a h s h e e f t D e r a p f e t r n s i t a s h a t r e u d N e . J . A . C .  
7 : 1 4 A - 2 0 0 u r B e ( e n d ) e n o d i f a e b o y p a a s s a c a r a p p r b T v C e P d ,  
t h D e e p a r t h a r e n e t v a l u a r u e a n d t a s e s t o u a e t a m p i t a i l o n w a n t l e r  
N . J A . 7 C : 4 A - 2 ) 3 . S 2 ( a b l t e r w e a t e i a v t t e r e a p m e n t m a g n b e  
c o n s i d e r e d r e c e p t i s e P s s e o t h r a t t o s e t S e T P e s f l l u i e n n i t t a t i o n s ,  
a n n d a o n b e g r a r a t a n o d i f i t o a t h e i S o n J P D E S O p e r m l i s t u c h a s e s ,  
t h S e T P e r m i t a t e p e p s l o y h D e e p r a e r n f b a p e r m o d i f i t o a n t c i s o m e e i f i c  
c o n d i w t h i e n h s n d a p e g l l o u n e d d e r N . 7 J : 1 A A G r l 6 2 . 3 4 . 2 ( b ) .

W a i v a e c e n s i d r e t r e c d a s e - b y a s c i a s e p a r w m e d c t o n s o i r d e r  
p r e - w h e g a l e v i a f w a r i v a p p r o v i t i e e c a i p f i l c t a t i o n  
p r o v i d e s i n f o r m a t i o n r e q u i r e d b y N . J : A B B 2 e a s e 4 A - 2 3 .  
a l s o f **RESPONSE** - 1 0 0 c e b r l n e i m o s e g D o d r R e s p o s e  
C o m m e c h o t c s u m e n t .

N o c h a n g a e v e e n a d e o h F e i r p a e l r m a a r ( e s s u f l h t c i s m m e n t .

**107 COMMENT:** h e e v e b r u t l i n e h P e v S N C J P D E s r d i i s t c 0 5 0 e s a t e d  
b y p a s s e c o n t r a e r a y p m e n t i f o n S e T B a C S O n a t i d e r t n h a a t i n e