STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

MISSOURI CLEAN WATER COMMISSION



CONSTRUCTION PERMIT

The Missouri Department of Natural Resources hereby issues a permit to:

Highlander Group LLC Osage Campground Retreat WWTF 10407 Marina Rd Jefferson City, MO 65101

for the construction of (described facilities):

See attached.

Permit Conditions:

See attached.

Construction of such proposed facilities shall be in accordance with the provisions of the Missouri Clean Water Law, Chapter 644, RSMo, and regulation promulgated thereunder, or this permit may be revoked by the Department of Natural Resources (Department).

As the Department does not examine structural features of design or the efficiency of mechanical equipment, the issuance of this permit does not include approval of these features.

A representative of the Department may inspect the work covered by this permit during construction. Issuance of a permit to operate by the Department will be contingent on the work substantially adhering to the approved plans and specifications.

This permit applies only to the construction of water pollution control components; it does not apply to other environmentally regulated areas.

August 26, 2021 Effective Date

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Edward B. Galbraith, Director, Division of Environmental Quality

August 25, 2023

Expiration Date

Chris Wieberg, Director, Water Protection Program

CONSTRUCTION PERMIT

I. CONSTRUCTION DESCRIPTION

The proposed project includes converting 2 existing septic tanks and leach field to new no-discharge septic tanks and a drip distribution system. The 2 existing septic tanks will be reused in the new proposed treatment facility with a total capacity of 2,500 gallons. The existing septic tanks will be followed by a Bio-Microbics High Strength FAST Aerobic Treatment Unit (HSFAST 4.5) with a 4,500 gallon tank, a 3,000 gallon pump tank, and 2 drip fields. The facility will treat the wastewater from 38 RVs and 1 mobile home with 3 bedrooms. The design average flow for the facility is 4,000 gpd. The drip distribution system will include 2 fields and will apply at an application irrigation rate of 0.25 gpd/ft². Sludge will be pumped out of the septic tanks and hauled off site by a certified hauler and disposed of at a certified facility.

This project will also include general site work appropriate to the scope and purpose of the project and all necessary appurtenances to make a complete and usable wastewater treatment facility.

II. COST ANALYSIS FOR COMPLIANCE

Pursuant to Section 644.145, RSMo, when issuing permits under this chapter that incorporate a new requirement for discharges from publicly owned combined or separate sanitary or storm sewer systems or publicly owned treatment works, or when enforcing provisions of this chapter or the Federal Water Pollution Control Act, 33 U.S.C. 1251 et seq., pertaining to any portion of a publicly owned combined or separate sanitary or storm sewer system or [publicly owned] treatment works, the Department of Natural Resources shall make a "finding of affordability" on the costs to be incurred and the impact of any rate changes on ratepayers upon which to base such permits and decisions, to the extent allowable under this chapter and the Federal Water Pollution Control Act. This process is completed through a cost analysis for compliance. Permits that do not include new requirements may be deemed affordable.

The Department is not required to complete a cost analysis for compliance because the facility is not a combined or separate sanitary sewer system for a publically-owned treatment works.

III. CONSTRUCTION PERMIT CONDITIONS

The permittee is authorized to construct subject to the following conditions:

- 1. This construction permit does not authorize discharge.
- 2. All construction shall be consistent with plans and specifications signed and sealed by Dennis Sievers with The Sewage Doctor, LLC and as described in this permit.

- 3. The Department must be contacted in writing prior to making any changes to the plans and specifications that would directly or indirectly have an impact on the capacity, flow, system layout, or reliability of the proposed wastewater treatment facilities or any design parameter that is addressed by 10 CSR 20-8, in accordance with 10 CSR 20-8.110(11).
- 4. State and federal law does not permit bypassing of raw wastewater, therefore steps must be taken to ensure that raw wastewater does not discharge during construction. If a sanitary sewer overflow or bypass occurs, report the appropriate information to the Department's Central Regional Office per 10 CSR 20-7.015(9) (G).
- 5. The wastewater treatment facility shall be located at least fifty feet (50') from any dwelling or establishment.
- 6. The wastewater treatment facility shall be located above the twenty-five (25)-year flood level.
- 7. The wastewater facility structures, electrical equipment, and mechanical equipment shall be protected from physical damage by not less than the one hundred- (100-) year flood elevation per 10 CSR 20-8.140(2)(B). The minimum distance between wastewater treatment facilities and all potable water sources shall be at least three hundred feet (300') per 10 CSR 20-8.140(2)(C)1.
- 8. In addition to the requirements for a construction permit, 10 CSR 20-6.200 requires land disturbance activities of 1 acre or more to obtain a Missouri state operating permit to discharge stormwater. The permit requires best management practices sufficient to control runoff and sedimentation to protect waters of the state. Land disturbance permits will only be obtained by means of the Department's ePermitting system available online at <u>dnr.mo.gov/env/wpp/epermit/help.htm</u>. See <u>dnr.mo.gov/env/wpp/stormwater/sw-land-disturb-permits.htm</u> for more information.
- 9. A United States Army Corps of Engineers (USACE) Clean Water Act Section 404 Department of the Army permit and a Section 401 Water Quality Certification issued by the Department may be required for the activities described in this permit. This permit is not valid until these requirements are satisfied or notification is provided that no Section 404 permit is required by the USACE. You must contact your local USACE district since they determine what waters are jurisdictional and which permitting requirements may apply. You may call the Department's Water Protection Program, Operating Permits Section at 573-522-4502 for more information. See <u>dnr.mo.gov/env/wpp/401/</u> for more information.
- 10. All construction must adhere to applicable 10 CSR 20-8 (Chapter 8) requirements listed below.
 - Subsurface systems shall—
 - Exclude unstabilized fill and soils that have been highly compacted and/or disturbed, such as old road beds, foundations, or similar things; 10 CSR 20-8.200 (7) (A) 1. A.

- Provide adequate surface drainage where slopes are less than two percent (2%); 10 CSR 20-8.200 (7) (A) 1. B.
- Provide surface and subsurface water diversion where necessary, such as a curtain or perimeter drain; 10 CSR 20-8.200 (7) (A) 1. C. and
- Have a ten foot (10') buffer from the property line. 10 CSR 20-8.200 (7) (A) 1. D.
- The vertical separation between the bottom of the drip lines and/or the trench and a limiting layer, including but not limited to, bedrock; restrictive horizon; or seasonal high water table, shall be no less than:
 - Twenty-four inches (24"); 10 CSR 20-8.200 (7) (A) 2. A. or
 - Twelve inches (12") for systems dispersing secondary or higher quality effluent; 10 CSR 20-8.200 (7) (A) 2. B. or
 - Forty-eight inches (48") where karst features are present unless the site can be reclassified. 10 CSR 20-8.200 (7) (A) 2. C.
- Subsurface systems shall be, at a minimum, preceded by preliminary treatment. 10 CSR 20-8.200 (7) (B)
- Loading rates shall not exceed the values assigned by the site and soil evaluation. 10 CSR 20-8.200 (7) (C)
- The location and size of the drains and buffers must be factored into the total area required for the drip dispersal system. 10 CSR 20-8.200 (9) (A) 1.
- The drip dispersal lines shall be placed at a minimum depth of six inches (6") below the surface. 10 CSR 20-8.200 (9) (B) 1.
- Emitters and drip dispersal lines shall be placed at a minimum on a two foot (2') spacing to achieve even distribution of the wastewater and maximum utilization of the soil. 10 CSR 20-8.200 (9) (B) 2.
- At a minimum, treatment prior to irrigation shall provide performance equivalent to that obtained from a primary wastewater lagoon cell and include 120 days of wastewater storage in addition to the primary volume. 10 CSR 20-8.200 (6) (C)
- There shall be no physical connections between a public or private potable water supply system and a sewer or appurtenance that would permit the passage of any wastewater or polluted water into the potable supply. 10 CSR 20-8.120 (5) (A)
- Sewers shall be laid at least fifty feet (50') in a horizontal direction from any existing or proposed public water supply well or other water supply sources or structures. Sewers must also comply with 10 CSR 23-3.010. 10 CSR 20-8.120 (5) (B)
- Electrical Equipment shall provide a watertight seal and separate strain relief for all flexible cable. 10 CSR 20-8.130 (3) (B) 2. C.
- Install a fused disconnect switch located above ground for the main power feed for all pumping stations. 10 CSR 20-8.130 (3) (B) 2. D.

- When electrical equipment is exposed to weather, it shall comply with the requirements of weather proof equipment; enclosure NEMA 4; NEMA 4X where necessary; and *NEMA Standard 250-2014*, published December 15, 2014. 10 CSR 20-8.130 (3) (B) 2. E.
- The septic tank shall be baffled. 10 CSR 20-8.180 (2) (B)
- Septic tank design shall provide at least one (1) septic tank to serve each EDU. 10 CSR 20-8.125 (6) (D) 1.
- Septic tank design shall provide at least one thousand (1,000) gallons capacity. 10 CSR 20-8.125 (6) (D) 2.
- When existing on-site septic tanks are proposed for reuse in an alternative sewer system, they must be inspected and verified watertight prior to acceptance. 10 CSR 20-8.125 (6) (E)
- Submersible pumps shall be readily removable and replaceable without personnel entering, dewatering, or disconnecting any piping in the wet well. 10 CSR 20-8.130 (5) (A)
- Flood protection shall apply to new construction and to existing facilities undergoing major modification. The wastewater facility structures, electrical equipment, and mechanical equipment shall be protected from physical damage by not less than the one hundred- (100-) year flood elevation. CSR 20-8.140(2) (B). 10 CSR 20-8.130 (2) (A)
- Facilities shall be readily accessible by authorized personnel from a public right–ofway at all times. 10 CSR 20-8.140 (2) (D). 10 CSR 20-8.130 (2) (B).
- Submersible pump stations shall meet the applicable requirements under section (3) of this rule, except as modified in this section. 10 CSR 20-8.130 (5)
 - Pump Removal. Submersible pumps shall be readily removable and replaceable without personnel entering, dewatering, or disconnecting any piping in the wet well. 10 CSR 20-8.130 (5) (A)
 - 10 CSR 20-8.130 (5) (B) Valve Chamber and Valves. Valves required under subsection (3) (D) of this rule shall be located in a separate valve chamber.
 - A minimum access hatch dimensions of twenty-four inches by thirty-six inches (24" x 36") shall be provided. 10 CSR 20-8.130 (5) (B) 1.
- 11. Upon completion of construction:
 - A. The Highlander Group, LLC will become the continuing authority for operation and maintenance of these facilities;
 - B. Submit an electronic copy of the as builts if the project was not constructed in accordance with previously submitted plans and specifications; and

- C. Submit the enclosed form Statement of Work Completed to the Department in accordance with 10 CSR 20-6.010(5)(N)
- D. Submit a Form B Application for an Operating Permit for Domestic and fee to the Engineering Section of the Water Protection Program 60 days prior to operation. Identify that the application is for a General permit for land application of domestic wastewater, MO-G823000.

IV. REVIEW SUMMARY

1. CONSTRUCTION PURPOSE

Replacing an existing 2 septic tanks and a leach field with a subsurface drip distribution system preceded by the same 2 existing septic tanks, a Bio-Microbics High Strength FAST Aerobic Treatment Unit in a 4,500 gallon tank, and a 3,000 gallon pump tank to serve 38 RVs and 1 mobile home. The campground had been full for some months due to construction workers building a pipe line in the area and the facility failed to treat the generated wastewater. The new proposed project is to treat the generated wastewater to meet the requirements for the general permit MO-G823000.

2. FACILITY DESCRIPTION

Osage Campground Retreat WWTF is an existing facility that includes 2 septic tanks, one of 1,500 gallons capacity and the other one of 1,000 gallons capacity, and a leach field or a pressure dosed conventional trench system. The facility is currently not able to treat the wastewater because of the failure of the treatment system to meet the permit limits. The existing absorption field and the pressure dosed trenches will be abandoned after installation of the new drip system.

The new septic tanks and a drip distribution system will treat the wastewater from the campground by using the same 2 existing septic tanks (total volume = 2,500 gallons), a Bio-Microbics High Strength FAST Aerobic Treatment Unit (ATU) (HSFAST 4.5) in a 4,500 gallon tank, a 3,000 gallon pump tank, and finally will irrigate the treated wastewater to two subsurface drip fields. The total area of the irrigation drip fields is approximately 16,000 square feet and contains 8,000 linear feet of 1.25 inch tubing fitted with emitters every 2 ft and capable of a loading at peak flow of less than 0.25 gallons per sq. foot per day.

Osage Campground Retreat WWTF is located at in the vicinity of Marine Road, Jefferson City, in Cole County, Missouri. The facility has a design average flow of 4,000 gpd and serves a hydraulic population equivalent of approximately 40 people. The continuing authority for this project was verified as being The Highlander Group LLC, Charter Number LC001661899.

3. <u>COMPLIANCE PARAMETERS</u>

The proposed project is required to meet the requirements of MO-G823000 with an expiration date of August 24, 2022.

4. <u>REVIEW of MAJOR TREATMENT DESIGN CRITERIA</u>

Construction will cover the following items:

- Components are designed for a Population Equivalent of 40 based on hydraulic loading to the system.
- Septic Tank A septic tank provides passive primary treatment as the settleable solids in raw wastewater settle onto the bottom of the tank. Raw wastewater will flow by gravity to the 2,500 gallon two-compartment septic tanks. When the water level reaches a certain height, the wastewater flows into the second compartment by two tee-drop pipes. The first septic tank compartment will have 1,000 gallons of storage capacity and the second septic tanks compartment will have 1,500 gallons of storage capacity. All septic tanks will provide a minimum detention time of 36 hrs.
- Bio-Microbics High Strength FAST Unit. Following the two existing septic tanks, there are another two tanks, the first is one HSFAST 4.5 AUT- Aerator 4,500 gallon storage tank, and the second one is a drip pump tank with 3,000 gallons of storage capacity. Two screened simplex 0.33 HP pumps each capable of 20 gpm at 9.5 ft. of TDH are located in the second compartment of the septic tank. The pumped wastewater shall discharge into the two drip distribution fields. Settled solids in the septic tank shall be removed as required to an appropriate treatment plant. The treatment unit will be dosed at 400 gallons/dose ten times per day every 1.5 hours. Set the pump ON time for 23.5 minutes; OFF time for 90 minutes
- Soils Report. In the soils investigation, there was 1 pit dug over the proposed site. The report was conducted on March 3, 2016.
 - Soil test pit #1, located in the on-site borrow area, had a surface soil that was described as (silt loam silt clay loam) with an application rating of (0.25 0.24) gallons per square foot per day.
- Drip The facility has selected the Geoflow Wasteflow PC subsurface drip dispersal system. The system will dose 2 zones at 0.25 gpd/sq. ft., which provides 10 dosings per day. Each zone is 0.184 acres, for a total of 0.367 acres. 1 combo air/vacuum release valves will be installed. The drip distributing valve will be a Hydrotek valve Model 6600A. The hydraulic loading used in the design is 0.25 gallons per square foot per day. 1" Disc (100 μ) filters will be used above the manifold with 1.25" supply lines and ½" ID GeoFlow lines installed 8" deep. The drip field area is approximately 16,000 square feet and contains 8,000 linear feet of 1.25 inch tubing fitted with emitters every 2 ft and capable of a loading at peak flow of less than 0.25 gallons per sq. foot per day.

- Mound Drip lines will be placed in a Sand Mound spaced two feet apart (see appendix 2- Sand Mound Profile). The Sand Mound is property of American Manufacturing Company, Inc., Elkwood, Virginia. The facility will use approximately 25.2 cubic yards of soils from an area immediately adjacent to the dispersal field, which must be approved by the engineer before placement, and shall be sandy loam, silt loam, loam, or loamy sand containing less than 30% clay as described by the USDA. The mound system will consist of three layers: 6 in of clean soil, then 12 in of clean sand (C-33 Concrete), and 10 in of clean soil.
 - The existing clay layer as discussed in the geohydrologic report will be protective of the alluvial aquifer and likely would cause lateral water movement within the soil profile, not allowing for migration to groundwater. With the use of the mounded system, the depth of the soil column is being increased by an average of 1.5 feet, giving an additional volume of material for final treatment of the effluent.
- The control panel will be an SPI SSTD1B or approved equal, including a motor contactor, HOA switch, circuit breaker, timer, event counter and audio/visual alarms.
- Flood zone: The flood zone map shows that the proposed drip subsurface field is located within AE zone, however, the soil report shows that there is no evidence of existing seasonal water table and no bedrock to 50 in.

5. **OPERATING PERMIT**

After completion of construction project submit: statement of work completed, asbuilts if the project was not constructed in accordance with previously submitted plans and specifications, and ensure that Application Form B, and the appropriate fee have been submitted. Missouri State Operating Permit, General Permit MO-G823000, will be issued after receipt of the above documents.

V. NOTICE OF RIGHT TO APPEAL

If you were adversely affected by this decision, you may be entitled to an appeal before the Administrative Hearing Commission (AHC) pursuant to Section 621.250 RSMo. To appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC. Any appeal should be directed to:

Administrative Hearing Commission U.S. Post Office Building, Third Floor 131 West High Street, P.O. Box 1557 Jefferson City, MO 65102-1557 Phone: 573-751-2422 Fax: 573-751-5018 Website: https://ahc.mo.gov

Mohammed Mohammed Engineering Section Mohammed.Mohammed@dnr.mo.gov

Cailie Carlile, P.E. Engineering Section cailie.carlile@dnr.mo.gov

APPENDIX

1. Site Map



2. Sand Mound Profile



SAND MOUND CONSTRUCTION

RECEIVED						
MISSOURI DEPARTMENT OF NATURAL RESOURCES WATER PROTECTION PROGRAM APPLICATION FOR CONSTRUCTION PERMIT_ \$ 0 2021 WASTEWATER TREATMENT FACILITY Water Protection Program	FOR DEPARTMENT USE ONLY APP NO. CP NO. FEE RECEIVED CHECK NO. DATE RECEIVED OUL					
APPLICATION OVERVIEW						
The Application for Construction Permit – Wastewater Treatment Facility form has been devel of Part A and B. All applicants must complete Part A. Part B should be completed for appl wastewater or propose land application for wastewater treatment. Please read the accompa completing this form. Submittal of an incomplete application may result in the applicat	licants who currently land-apply nying instructions before					
PART A – BASIC INFORMATION	- A CARLER AND A CARLER AND A					
1.0 APPLICATION INFORMATION (Note – If any of the questions in this section are answer considered incomplete and returned.)	red NO, this application may be					
1.1 Is this a Federal/State funded project? YES XN/A Funding Agency:						
1.2 Has the Missouri Department of Natural Resources approved the proposed project's antic □ YES Date of Approval: ■ N/A	legradation review?					
1.3 Has the department approved the proposed project's facility plan*?						
 1.4 [Complete only if answered No on No. 1.3.] Is a copy of the facility plan* for wastewater to application? YES INO Exempt because 	reatment facilities included with this					
1.5 Is a copy of the appropriate plans* and specifications* included with this application?	tions.)					
1.6 Is a summary of design* included with this application? X YES INO						
 1.7 Has the appropriate operating permit application (A, B, or B2) been submitted to the depart YES Date of submittal: <u>5-21</u> Email to Circly ☐ Enclosed is the appropriate operating permit application and fee submittal. Denote whi I N/A: However, In the event the department believes that my operating permit requires a changing equivalent to secondary limits to secondary limits or adding total residual chloring to public notice? I YES I NO 	ich form: A B B2 revision to permit limitation such as					
1.8 Is the facility currently under enforcement with the department or the Environmental Protect	ction Agency? 🔲 YES 🕅 NO					
1.9 Is the appropriate fee or JetPay confirmation included with this application? XES [See Section 7.0	INO shot sure					
* Must be affixed with a Missouri registered professional engineer's seal, signature and date.						
2.0 PROJECT INFORMATION						
Replace a failed treatment plant. 2.4 sludge HANDLING, USE AND DISPOSAL DESCRIPTION						
Current: Septic tank to Leach field, New Septic -	Air - Drip I Think					
A. Current population: 1^{2} ; Design population: $38'$						
B. Actual Flow: gpd; Design Average Flow: gpd; Actual Peak Daily Flow: gpd; Design Maximum Daily Flow: gpd; Desig	n Wet Weather Event:					
2.6 ADDITIONAL INFORMATION						
A. Is a topographic map attached?						
B. Is a process flow diagram attached? 🗌 YES 🙀 NO						
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3.0 WASTEWATER TREATMENT FACILITY							
AME		TELEPHONE NUMBER WITH AREA CODE		E-MAIL ADDRESS			
Osay Cumppound Retreat		573-640-5344		honse 30 gmol. com			
ADDRESS (PHYSICAL)	TY To	Same 11	STATE	ZIP CODE	Cole		
10407 Marina Rd 65601			Mo	65101	Core		
Wastewater Treatment Facility: Mo- (Outfall Of)							
3.1 Legal Description:¼,¼,¼, Sec, T, R (Use additional pages if construction of more than one outfall is proposed.)							
3.2 UTM Coordinates Easting (X): Northing (Y): For Universal Transverse Mercator (UTM), Zone 15 North referenced to North American Datum 1983 (NAD83)							
3.3 Name of receiving streams:							
4.0 PROJECT OWNER							
NAME		TELEPHONE NUMBER WITH AREA CODE		E-MAIL ADDRESS			
ADDRESS		513-670-	STATE	ZIP CODE	gma-1.00m		
Address 2010407 Marina RD				65-101			
5.0 CONTINUING AUTHORITY: A continuing authority is a company, business, entity or person(s) that will be operating the facility and/or ensuring compliance with the permit requirements.							
NAME		TELEPHONE NUMBER WITH A	REA CODE	E-MAIL ADDRESS			
ADDRESS	TV	573-690-	5344 STATE	Nonse 30	gmall.com		
ADDRESS 10407 Marina RD	Zett	usan city	MO	GS101			
5.1 A letter from the continuing authority, if diffe							
5.2 COMPLETE THE FOLLOWING IF THE CONTINUING AUTHORITY	IS A MISS	OURI PUBLIC SERVICE COMMIS	SSION REGULATED	ENTITY.	· · · · · · · · · · · · · · · · · · ·		
A. Is a copy of the certificate of convenience an	d neces	sity included with this a	application?	YES 📉 NO			
5.3 COMPLETE THE FOLLOWING IF THE CONTINUING AUTHORITY	IS A PROP	PERTY OWNERS ASSOCIATION					
A. Is a copy of the as-filed restrictions and cover	nants in	cluded with this applica	ation?	ES 🕅 NO			
B. Is a copy of the as-filed warranty deed, quitclaim deed or other legal instrument which transfers ownership of the land for the							
wastewater treatment facility to the association included with this application?							
C. Is a copy of the as-filed legal instrument (typically the plat) that provides the association with valid easements for all sewers included with this application?							
D. Is a copy of the Missouri Secretary of State's		fit corporation certificat	e included wit	h this application?	YES NO		
6.0 ENGINEER							
ENGINEER NAME / COMPANY NAME Sewan		TELEPHONE NUMBER WITH A		E-MAIL ADDRESS			
Dennis Sievers, Docto	-	573-808-1875		the seway doctor ognic toom			
ADDRESS CIT	ΓY		STATE	ZIP CODE	v		
7.0 APPLICATION FEE							
CHECK NUMBER		JETPAY CONFIRMATION NUME			la ser d'an d'an de la ser d'an de la ser		
8.0 PROJECT OWNER: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information							
submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for							
gathering the information, the information submitted is, to the 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 imprisonment for							
knowing violations. PROJECT OWNER SIGNATURE							
ne							
PRINTED NAME				DATE			
Juston Honse				7-5-21			
TITLE OR CORPORATE POSITION		TELEPHONE NUMBER WITH AR	EA CODE	E-MAIL ADDRESS	`		
Owner		577-640-	5344	7-5-21 E-MAIL ADDRESS Honse 3071	mail.com		
Mail completed copy to: MISSOURI DEPARTMENT OF NATURAL RESOURCES							
WATER PROTECTION PROGRAM							
P.O. BOX 176 JEFFERSON CITY, MO 65102-0176							
END OF PART A.							
REFER TO THE APPLICATION OVERVIEW TO DETERMINE WHETHER PART B NEEDS TO BE COMPLETE.							
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