STATE OF MISSOURI DEPARTMENT OF NATURAL RESOURCES

MISSOURI CLEAN WATER COMMISSION



GENERAL PERMIT for SEWER EXTENSION CONSTRUCTION

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

Construction Permit ID: MOGSE0455
Title of Project: City of Rogersville
Owner: City of Rogersville
Address: 211 East Center

ROGERSVILLE, MO 65742

The project will also include general site work appropriate to the scope and purpose of the project and will include all the necessary appurtenances to make a complete and usable collection system. The construction of this project will be in the vicinity of the county below and discharge to Receiving Permit ID below:

County: Webster Receiving Permit ID: MO0102679

for the construction of (described construction project):

Sawyer Creek 2nd Addition Subdivision-Construction of approximately 3,500 lf of 8-inch PVC SDR-26 with approximately 13 manholes to serve a 215 PE and a design average flow of 21,460 gpd. Project is in the vicinity of Spring Meadow Dr. in Rogersville, Webster County and discharges to an existing system to be treated at the City of Rogersville WWTF, MO-0102679. Bryan Inmon, Public Works Director with City of Rogersville provided an acceptance form dated December 12, 2022.

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.

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

December 27, 2022	Chie Wubug
Issue Date	Chris Wieberg, Director
	Water Protection Program

January 02, 2025
Expiration Date

APPLICABILITY

- 1. This permit authorizes the construction of gravity sewer extensions, force mains, and lift stations. Non-earthen flow equalization storage basins at lift stations and inline storage, which flows back into the lift station or collection system, are also included.
- 2. A site specific sewer extension construction permit may be required by the Department due to compliance and enforcement actions.
- 3. Projects located within an Approved Sewer Program as noted in the operating permit of the receiving wastewater treatment facility are not required to obtain a construction permit from the Department of Natural Resources (Department).
- 4. This permit does not apply to:
 - A. Earthen storage basins;
 - B. Exempt projects unless requested by the applicant or required by enforcement.

PREREQUISITES:

- 1. The General Sewer Extension Construction Permit application, appropriate fee, and documentation in accordance with 10 CSR 20-6.010(5)(G).
- 2. The plans and specifications each signed and sealed by a professional engineer registered in the State of Missouri in accordance with 10 CSR 20-8 and 10 CSR 20-6.010.
- 3. The Design Certification form or Engineering Report or Summary of Design signed and sealed by a professional engineer registered in the State of Missouri certifying the design of the system was prepared in accordance with 10 CSR 20-6 and 10 CSR 20-8.
- 4. A statement from the continuing authority, as defined in 10 CSR 20-6.010, accepting the wastewater for treatment and indicating the permitted treatment facility has the available capacity.
- 5. A statement from the continuing authority, as defined in 10 CSR 20-6.010, accepting the responsibility for operation and maintenance of these facilities.

PERMIT CONDITIONS:

- 1. This permit authorizes the activities and scope of work detailed in the plans and specifications submitted with the request.
- 2. The construction must be in accordance with the final plans and specifications approved by the Department.
- 3. 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 regional office per 10 CSR 20-7.015(9)(E)2., or through the Online Bypass/SSO Reporting system found at https://dnr.mo.gov/eservices.htm under Water Protection.

PERMIT CONDITIONS: (continued)

- 4. Protection of drinking water supplies must meet the requirements of 10 CSR 23-3.010.
 - A. There shall be no physical connections between a public or private potable water supply system and a sewer, or appurtenance thereto, which would permit the passage of any wastewater or polluted water into the potable supply.
 - B. 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.
- 5. Manholes shall be located with the top access at or above grade level.
- 6. In addition to the requirements for a construction permit, see 10 CSR 20-6.200 for land disturbance requirements 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_www.dnr.mo.gov/env/wpp/epermit/help.htm.

See <u>www.dnr.mo.gov/env/wpp/stormwater/sw-land-disturb-permits.htm</u> for more information.

7. A United States (U.S.) Army Corps of Engineers (COE) permit (404) and a Water Quality Certification (401) issued by the Department or permit waiver may be required for the activities described in this permit. This permit is not valid until these requirements are satisfied. If construction activity will disturb any land below the ordinary high water mark of Jurisdictional Waters of the U.S. then a 404/401 will be required. Since the COE makes determinations on what is jurisdictional, you must contact the COE to determine permitting requirements. You may call the Department's Water Protection Program at 573-751-1300 for more information.

See www.dnr.mo.gov/env/wpp/401/ for more information.

- 8. If this project eliminates a wastewater treatment facility under the jurisdiction of the Department, then a full closure plan shall be submitted with a Facility Closure Request Form, Form MO 780-2512 to the Department's appropriate regional office for review and approval. In accordance with 10 CSR 20-6.010(12), the closure plan must meet the requirements outlined in Standard Conditions Part III, of the Missouri State Operating Permit. Closure shall not commence until the submitted closure plan is approved by the Department.
- 9. If this project is part of a project to resolve an enforcement action or is receiving funding from the Department, submit a statement of work complete following the completion of construction

MISSOURI DEPARTMENT OF NATURAL RESOURCES WATER PROTECTION PROGRAM APPLICATION FOR CONSTRUCTION PERMIT – SEWER EXTENSION

FOR DEPA	ARTMENT USE ONLY
APP NO.	CP NO.
FEE RECEIVED	CHECK NO.
DATE RECEIVED	

Page 1 of 2

			DATE RECEIVE	ED
NOTE ► PLEASE READ THE ACCOM	PANYING INSTRUCTIO	NS BEFORE COMPI	LETING THIS FOR	VI TO THE STATE OF
1.0 APPLICATION INFORMATION (No considered incomplete and returned.)	ote – If any of the questio	ns in this section are	answered NO, this	application may be
1.1 Is this a Federal/State funded project	ct? YES N/A	Funding Agency:		Project #:
1.2 Has the Department of Natural Resorm YES Date of Approval:	ources approved the prop	oosed project's engine	eering report*?	,
1.3 Is a copy of the appropriate plans* a	and specifications* includ	ed with this applicatio	on? ZYES N	10
1.4 Is a summary of design* included wi		YES NO		
1.5 Is the appropriate fee or JetPay con See Section 7.0	firmation included with th	is application? 🗹 YE	ES NO	
* Must be affixed with a Missouri register	ed professional engineer	's seal. signature and	d date	
2.0 PROJECT INFORMATION 2.1 NAME OF PROJECT				
Sawyer Creek 2nd Addition Subdivision				
ADDRESS	CITY	STATE	ZIP CODE	COUNTY
Spring Meadow Dr	Rogersville	Мо	65742	Webster
2.2 Legal Description: 1/4, E	1/4, SE 1/4, Se	c. ₁₈ , T ₂₈ ,	R _{19W}	
3. Project Commonants (short Hill)				
✓ Gravity sewers ☐ Pumping stated Project Description Extend the public sanitary sewer to serve nanholes and 3,500 lf of gravity sewer pipers. 5 DESIGN INFORMATION	ations ☐ Force mains the proposed Sawyer Cr oe.			struction includes 13
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5.0 ENGINEER						
ENGINEER NAME / COMPANY NAME			TELEPHONE NUMBER WITH AREA CODE		EMAIL ADDRESS	
LEE ENGINEERING & ASSOCIATES			417-886-9100		drichards@leeengineering.biz	
ADDRESS CITY		CITY	STATE		ZIP CODE	
1200 E WOODHURST DR, STE	D-200	SPRING	FIELD	MO	65804	
6.0 RECEIVING WASTEWATER	RTREATME	NT FACIL	.ITY			
NAME			TELEPHONE NUMBER	R WITH AREA CODE	EMAIL ADDRESS	
City of Rogersville WWTP			(417) 753-2884		binmon@rogersvillemo.org	
MISSOURI STATE OPERATING PERMIT #		***************************************	REMAINING CAPACIT	Y (GPD)		
MO-0102679			419,850 GPD			
6.1 Has the receiving treatment	facility agree	ed to accep	ot the additional w	vastewater flow?	7 YES NO	
6.2 A letter from the receiving wa	astewater tre	eatment fac	cility, if different th	nan the continuing	g authority, is included with this application.	
7.0 Application Fee			Market A.	MELANS:		
☐Check Number				☐JetPay Confirm	nation Number	
submitted. Based on my inquiry of gathering the information, the information aware that there are significant p knowing violations.	of the persor ormation sub	or person	ssure that qualifie is who manage the to the best of my	d personnel properties by the system, or those knowledge and be	nts were prepared under my direction or erly gather and evaluate the information e persons directly responsible for elief, true, accurate, and complete. I am asibility of fine and imprisonment for	
PROJECT OWNER SIGNATURE PRINTED NAME						
Bryan Inmon					DATE 12/9/2022	
TITLE OR COPORATE POSITION			TELEPHONE NUMBER	WITH AREA CODE	EMAIL ADDRESS	
Public Works Director			417-753-2884		binmon@rogersvillemo.org	
Mail completed copy to:	WATER PR P.O. BOX 1	ROTECTIO 76	MENT OF NATUF N PROGRAM IO 65102-0176	RAL RESOURCES		
Vicinity.					Page 2 of 2	

INSTRUCTIONS FOR COMPLETING APPLICATION FOR CONSTRUCTION PERMIT – SEWER EXTENSION

All blanks must be filled in when the application is submitted to the Missouri Department of Natural Resources. This includes the **required signature**.

In accordance with Missouri State law RSMo 644.051.3.(2), sewer extension projects installing up to a total of 1,000 linear feet of gravity sewer or force main with less than two pump stations are exempt from obtaining a construction permit. Since these projects are exempt, a construction permit will not be issued for this activity and completion of this form is not required.

Note: Use the form *Application for Construction Permit – Wastewater Treatment Facility*, MO 780-2189, if any wastewater treatment component(s) are to be constructed.

A land disturbance permit is required if construction will result in the disturbance of one or more acres of land. A land disturbance permit is available through the department's ePermitting system at dnr.mo.gov/env/wpp/epermit/help.htm. A permit fee in accordance with 10 CSR 20-6.011(2)(E) is required.

After receiving a complete application, the department enters the application information into the Missouri Clean Water Information System. You may search for the status of a construction permit online at https://apps5.mo.gov/mocwis public/applicationInprocessSearch.do.

- 1.1 Check appropriate box. If the project is funded with federal or state monies, supply the funding agency name and project number.
- 1.2 Check appropriate box and provide the date of department approval.

 The department has developed a fact sheet to aid in the development of an approvable engineering report. This document is available online at dnr.mo.gov/pubs/pub2415.htm. Engineering report exemptions are listed in 10 CSR 20-6.010(4)(B). Per 10 CSR 20-8.110(2), engineering reports must be approved by the department prior to the submittal of plans and specifications and a construction permit application. The department has developed a fact sheet to aid in the development of an approvable engineering report, Engineering Report Guidance for Collection Systems, Fact Sheet--PUB2415.
- 1.3 Check appropriate box. Provide a copy of the appropriate plans and specifications for department review when applying for a construction permit per 10 CSR 20-8.110 and 10 CSR 20-6.010. A Missouri registered professional engineering seal, signature and date is required on each sheet of the plans and the cover of the technical specifications. An electronic copy of the construction permit application and the information listed below in Portable Document Format (PDF) searchable format or department approved equivalent per 10 CSR 20-6.010(5) (G), along with one paper copy for projects not seeking department funding or two paper copies for projects seeking department funding under 10 CSR 20-4.
- 1.4 Check appropriate box. A summary of design shall accompany the plans and specifications when applying for a construction permit per 10 CSR 20-8.110. The department has developed a fact sheet to aid in the development of an acceptable summary of design, <u>Summary of Design Guidance</u>, Fact Sheet--PUB2417.
- 1.5 Check the appropriate box. Include fee with application per 10 CSR 20-6.011(2) and Wastewater Treatment Facility Permit Fees -- PUB2564.
- Note: The department returns incomplete construction permit applications and related engineering documents and the application forfeits the fees. See 10 CSR 20-6.011(5)(A). The applicant forfeits the fees when the applicant withdraws construction applications. See 10 CSR 20-6.011(5)(B).2.1. Provide the project name and location by street name or address.
- 2.2 Provide the project legal description. The department's mapping system is available online at dnr.mo.gov/gis/.
- 2.3 Check all of the applicable boxes.
 - The department considers anything other than a gravity sewer system to be an alternative sewer system. Examples of these systems are grinder pump pressure sewers, septic tank effluent pump, or STEP, sewers, septic tank effluent gravity, or STEG, sewers or small diameter gravity sewers.
- 2.4 Briefly describe the project by providing the following information:
 - A. Total number of manholes.
 - B. Size of sewers and the total linear feet of each size.
 - C. Number of lift stations and design average flow and peak hourly flow capacities of each lift station.
 - D. Size and length of force mains.
 - E. Alternative sewer size and length, plus the number of components (e.g. septic tanks, grinder pumps, etc.)
- 2.5 Provide the project design information and when required in the units specified.
 - A. Provide the population or number of lots to be served by the proposed sewer extension.

- B. Provide the estimated design flow information in accordance with 10 CSR 20-8.110(4)(C)4.A.

 Design average flow The design average flow is the average of the daily volumes to be received for a continuous 12 month period expressed as a volume per unit time. However, the design average flow for facilities having critical seasonal high hydraulic loading periods (e.g., recreational areas, campuses and industrial facilities) shall be based on the daily average flow during the seasonal period.

 Design peak hourly flow The design peak hourly flow is the largest volume of flow to be received during a one hour period expressed as a volume per unit time.
- C. Provide the type and flow in gallons per day of industrial wastes received by the propose sewer extension.
- D. Provide the receiving sewer size in inches and capacity in gallons per minute.
- 3.0 Complete Project Owner information. Include the legal name and address.
- Continuing Authority A continuing authority is a company, business, entity or person(s) that will be operating the facility or ensuring compliance with the permit requirements. A continuing authority is not, however, an entity or individual that is contractually hired by the permittee to sample or operate and maintain the system for a defined time period, such as a certified operator or analytical laboratory. To access the regulatory requirement regarding continuing authority, 10 CSR 20-6.010(2), please visit http://s1.sos.mo.gov/cmsimages/adrules/csr/current/10csr/10c20-6.pdf. A continuing authority's name must be listed exactly as it appears on the Missouri Secretary of State's (SoS's) webpage: https://bsd.sos.mo.gov/BusinessEntity/BESearch.aspx?SearchType=0, unless the continuing authority is an individual(s), government, or otherwise not required to register with the SoS. If same as the Project Owner, write "Same as above".
- 4.1 Check appropriate box. Include a letter signed by the continuing authority (if not same as the project owner) stating they will "accept, operate and maintain" the sewer extension. The continuing authority may also complete the Continuing Authority and Receiving Wastewater Treatment Facility Acceptance form in lieu of a letter. If the continuing authority will not accept and agree to operate and maintain the sewer extension, this application will be considered incomplete.
- 5.0 Complete Engineer contact information.
- 6.0 Complete Receiving Wastewater Treatment Facility information. Include the Missouri State Operating Permit number and the available remaining capacity in gallons per day, or gpd.
- Check appropriate box. The receiving wastewater treatment facility must be notified and agree to the proposed sewer extension and additional flow, prior to submitting a construction permit to the department. If the receiving wastewater treatment facility will not accept the wastewater, this application will be considered incomplete.
- 6.2 Check appropriate box. Include a letter from the receiving wastewater treatment facility (if not same as the continuing authority) acknowledging and accepting the additional flow from the proposed sewer extension.
- 7.0 Check the appropriate box and include check or confirmation number. Applicants can pay fees online by credit card or eCheck through a system called JetPay.
 - Per Section 37.001, RSMo, a transaction fee will be included. The transaction fee is paid to the third party vendor JetPay, not the Department of Natural Resources.
 - Be sure to select the correct fee type and corresponding URL to ensure your payment is applied appropriately. If you are unsure what type of fee to pay, please contact the Water Protection Program's Budget, Fees, and Grants Management Unit by phone at 573-522-1485 for assistance.
 - Upon successful completion of your payment, JetPay provides a payment confirmation. Submit this form
 with a copy of the payment confirmation if requesting a new permit or a permit modification. For permit
 renewals of active permits, the Department will invoice fees annually in a separate request.

 - Applicants can find fee rates in 10 CSR 20-6.011 and Wastewater Treatment Facility Permit Fees-PUB2564 (https://dnr.mo.gov/pubs/pub2564.htm).

WP 04 Construction Permits: https://magic.collectorsolutions.com/magic-ui/payments/mo-natural-resources/592/
8.0 The owner of the construction project must sign the application.

Mail the completed form and applicable fee to the department.

If there are any questions concerning this form, please contact the Department of Natural Resources, Water Protection Program at 800-361-4827 or 573-751-1300 or visit dnr.mo.gov/env/wpp/permits/ww-construction-permitting.htm.

SEWER EXTENSION DESIGN CERTIFICATION

Answer all questions yes, no, or N/A. Answer N/A only if the question is clearly not applicable to the design of the proposed sewer extension **OR** if a deviation was previously allowed by the Department in the approval of Standard specifications or Standard Detail Sheets.

9.0	SEWER EXTEN	SION CHECKLIST	5 2 5 1		
	REGULATION		LVES	T	
1	8.110(9)(B)		YES	NO	N/A
		Are detailed plans showing tributary area, boundaries, pertinent elevations, topography, existing and proposed facilities provided?	V		
2	8.110(3)(A)	Is the design flow based on actual flow data for an existing system?		ТП	1
3	8.110(3)(B)	Are average design flows, peak hourly flows, and I&I contributions for new systems calculated.	V		
4	8.120(2)	Does the sewer exclude water from roofs, streets, groundwater from foundation drains, and combined wastewater?	V		
5	8.120(3)(C)	Is ASTM C969-17 leakage test specified to ensure water tight joint seals and appropriate exfiltration and infiltration rates?	V		$\top \Box$
6	8.120(4)(A)	Are manholes located at all changes in grade, size or alignment, and all intersections?	V		
7	8.120(3)(A)1	Are all sewer pipes constructed with a slope to obtain mean velocities of not less than 2 feet per second?	V		
8	8.120(3)(A)2	Is the pipe covered with at least 36" of soil or sufficiently insulated to prevent freezing?	V		
9	8.120(3)(A)	Is the pipe installation, embedment, and backfill designed to prevent damage to the pipe and its joints?	V		
10	8.120(3)(B)	Is deflection testing specified to ensure no pipe exceeds a deflection of 5% of the inside diameter?	V		
11	8.120(4)(C)	Are manholes at least 42 inches in diameter with a clear opening of 22 inches on sewer line larger than 8"?	V		
12	8.120(4)(C)	Where cleanouts are used at the end of a lateral instead of a manhole, are they a minimum diameter of 8 inches or larger and equal to the diameter for pipes < 8"?			V
13	8.120(4)(E)	Are the manholes specified to be watertight, constructed, installed in accordance with the manufacturer's recommendations and procedures?	V		
14	8.120(4)(F)	Do the specifications include a requirement for inspection and testing for manholes?	V		
15	8.120(5)(B)	Are sewers and manholes located at least 50 feet horizontally from any existing or proposed water supply well, sources, structures?	V		
16	8.120(5)(A)	Is the sewer free from physical connections to a potable water supply system with no water pipes coming in contact with a sewer manhole?	V		

10.0	PRESSURE S	EWERS, GRINDER PUMP, STEP AND STEG SEWER CHECKLIST			Factor of the
	REGULATION		YES	NO	N/A
17	8.125(5)(A)1.	Does the cleaning velocity of ≥ 2 ft/s happen at least once per day?	1.20	110	
18	8.125(5)(A)2.	Is the diameter of the pressure sewer main pipe at least 1.5"?	十片	+ $+$	√
19	8.125(5)B	Are appurtenances compatible with the piping system?	+H	+	7
20	8.125(5)(C)	Do service line pipes have a minimum diameter of 1.25 in.?	+	$+$ \dashv	7
21	8.125(5)(D)1. A	Do simplex grinder pump stations service only a single equivalent dwelling unit (EDU)? i.e. 1 residence – 1 grinder pump station.			V
22	8.125(5)(D)1. B	Are multiple unit pump stations owned, operated, maintained by an approved continuing authority?	\perp		V
23	8.125(5)(D)3	Is there at least 70 gallons of storage in the grinder pump unit?	一一	一一	V
24	8.125(5)(D)4	Do grinder pump stations have shutoff valves, check valves, and anti- siphon valves (where siphoning could occur) that are accessible from the ground surface?			
25	8.125(5)(D)7 8.130(3)(B)2	Are units serviceable and replaceable under wet conditions without electrical hazard and electrical equipment suitable for hazardous locations (National Electrical Code, Class I, Group D, Division 1 location)?			V
26	8.125(5)(D)8 8.125(6)(F)6	Are provisions in place to avoid interruption of service due to mechanical or power failure by providing standby power, storage capacity or interconnection with another disposal system?			V
27	8.125(6)(D) 8.180(2)	Does each EDU have at least one septic tank with a minimum of 1,000 gallon capacity with 20% of tank volume dedicated to freeboard and ventilation?			V
28	8.125(6)(F)	Are pump vaults designed with duplex pumps for STEP sewer systems with design flow of 1,500 gallons per day or greater?			V
29	8.125(7)(A) 8.125(7)(C)	Is the minimum STEG sewerservice line at least 4" in diameter?			V
11.0	PUMP STATION	N CHECKLIST	1111		
20	REGULATION		YES	NO	N/A
30	8.130(2)(A) 8.140(2)(B)	Is the pump station designed to withstand the 100-year flood?			V
31	8.130(3)(A)	Is the dry well completely separate from the wet well and is a suitable and safe means of access provided to each?			V
32	8.130(3)(B)	If the design flow is 1,500 gpd or more, are at least 2 pumps or pneumatic ejectors provided?			
33	8.130(3)(D)	Are valves located outside wet well unless integral to a pump or its housing?			<u>.</u> .
	8.130(3)(F) 8.140(8)(J)	Do wet and dry wells have separate ventilation systems?			<u></u> ✓
	8.130(3)(G)	Does all potable water brought to the pump station comply with 8.140 (7) D?			V
	8.130(6)	Is an alarm system provided with uninterrupted power?	П	П	V
	8.130(7)(A)	Is there 2 hours retention of the peak hourly flow for a design flow > 100,000 gpd or 4 hrs retention of the peak hourly flow for a design flow < 100,000 gpd?			✓
	8.130(7)(B)	Is there an independent utility substation provided for emergency power that is capable of starting and operating the pump station at its rated capacity?			V
39	8.130(8)(A)	Is the force main velocity of ≥ 2 ft/s maintained?		П	V
40	8.130	Are there complete operation instructions for the pumping stations			<u> </u>
		provided that include emergency procedures, maintenance schedules, special tools and spare parts that may be necessary?			✓

12.0	SUCTION LIFT	PUMP AND SUBMERSIBLE PUMP STATION CHECKLIST	111	1000	
	REGULATION		YES	NO	N/A
41	8.130(4)	Are the suction lift pumps of the self priming or vacuum priming type?			V
42	8.130(4)(A)	Is the combined total of dynamic suction lift at the "pump off" elevation and required net positive suction head at design operating conditions less than or equal to twenty-two feet (22')?			✓
43	8.130(4)(B)	Are there dual vacuum pumps capable of removing air from the suction lift pump?			✓
44	8.130(5)(A)	Are submersible pumps readily removable and replaceable without personel entering, or disconnecting any pipe in the wet well?			✓
13.0	CERTIFICATION	N STATEMENT			
	including the pos I hereby certify the that I am a duly L	nat the design plans and specifications for this project, to the best of my known is listed above. I am aware that there are significant penalties for submitting saibility of fine and imprisonment. The plan is plan in the plan in the project was prepared by me or under my define a project was project of the state of the project was prepared by me or under my define the project was project was prepared by me or under my define the project was project was prepared by me or under my define the project was project was prepared by me or under my define the project was project was prepared by me or under my define the project was project was project was project was project was project was pro	false inf lirect su	ormatior pervisior	n, n and
	ouri Professional E	ered "NO" provide explanation. Provide any useful comments on design for			
IVII 55C	un Professional E	Daniel Richards			
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