



Tulane Environmental Law Clinic

November 4, 2011

Via Certified Mail

The Honorable Johnny L. DuPree, Ph.D.
City of Hattiesburg
PO Box 1898
Hattiesburg, MS 39403-1898

Re: Notice of Intent to File Citizen Suit against the City of Hattiesburg for violation of the Clean Water Act and Water Pollution Control Permits Nos. MS0020826 (North Lagoon), MS0020303 (South Lagoon)

Dear Mayor DuPree,

This letter provides notice of Gulf Restoration Network's intent to sue the City of Hattiesburg under Clean Water Act § 505, 33 U.S.C. § 1365, for violations of Clean Water Act § 301, 33 U.S.C. § 1311(a), and Water Pollution Control Permits Nos. MS0020826 and MS0020303 at the City's wastewater treatment lagoons.

The City of Hattiesburg owns and operates wastewater treatment facilities in Hattiesburg referred to as the North Lagoon located at 3401 Lakeview Road, and the South Lagoon located at 1903 East Hardy Street. The Mississippi Department of Environmental Quality ("MDEQ") issued Permit No. MS0020826 to the City for discharges from the North Lagoon Outfall 001 into the Bouie River (sometimes referred to as the "Bowie River"). MDEQ issued Permit No. MS0020303 to the City for discharges from the South Lagoon Outfall 001 into the Leaf River. Both permits require the wastewater the City discharges from the lagoons into the respective waterbodies to meet specified numerical pollutant limits.

The numerical permit limits for discharges from Outfall 001 at the North Lagoon are as follows:

Residual Chlorine

0.35 mg/L monthly average, 0.6 mg/L max weekly average
Must test three times per week

Fecal Coliform

May-Oct: 200 colonies/100 mL monthly average, 400 colonies/100 mL max weekly average
Nov-Apr: 2000 colonies/100 mL monthly average, 4000 colonies/100 mL max weekly average
Must test monthly

Biochemical Oxygen Demand, 5 day (BOD)

Tulane Environmental Law Clinic

6329 Freret St., Ste. 130, New Orleans, LA 70118-6231 tel 504.865.5789 fax 862.8721 www.tulane.edu/~telc

Quantity/loading – 1000 lbs/day monthly average, 1500 lbs/day max weekly average (prior to July 2010)

Quantity/loading - 1001 lbs/day monthly average, 1502 lbs/day max weekly average (beginning in July 2010)

Quality/concentration - 30 mg/L monthly average, 45 mg/L max weekly average

Removal efficiency – 80% minimum

Must test/calculate monthly

Total Suspended Solids (TSS)

Quantity/loading – 1000 lbs/day monthly average, 1500 lbs/day max weekly average (prior to July 2010)

Quantity/loading - 1001 lbs/day monthly average, 1502 lbs/day max weekly average (beginning in July 2010)

Quality/concentration - 30 mg/L monthly average, 45 mg/L max weekly average

Removal efficiency – 76% minimum

Must test/calculate monthly

Permit No. MS0020826, Limits and Monitoring, p. 1-2.

The numerical permit limits for discharges from Outfall 001 at the South Lagoon are as follows:

Residual Chlorine

0.14 mg/L monthly average, 0.21 max weekly average (prior to July 2010)

0.134 mg/L monthly average, 0.23 mg/L max weekly average (beginning in July 2010)

Must test daily

Fecal Coliform

May-Oct: 200 colonies/100 mL monthly average, 400 colonies/100 mL max weekly average

Nov-Apr: 2000 colonies/100 mL monthly average, 4000 colonies/100 mL max weekly average

Must test twice per season

Biochemical Oxygen Demand, 5 day (BOD)

Quantity/loading - 5007 lbs/day monthly average, 7511 lbs/day max weekly average

Quality/concentration – 35 mg/L monthly average, 53 mg/L max weekly average (prior to July 2010)

Quality/concentration - 30 mg/L monthly average, 45 mg/L max weekly average (beginning in July 2010)

Removal efficiency – 65% minimum

Must test/calculate monthly

Total Suspended Solids (TSS)

Quantity/loading - 15021 lbs/day monthly average, 22532 lbs/day max weekly average

Quality/concentration - 90 mg/L monthly average, 135 mg/L max weekly average

Removal efficiency – 65 % minimum

Must test/calculate monthly

Permit No. MS0020303, Limits and Monitoring, p. 1-2.

Both permits require the City to report violations of numerical permit limits by providing monthly Discharge Monitoring Reports to MDEQ. *Id.* at Condition S-3.

In addition to these numerical limits, both permits require the discharge to meet narrative requirements prohibiting floating solids or visible foam other than trace amounts. *See* Permit Nos. MS0020826 and MS0020303, Condition L-1. The permits also prohibit a buildup of solids or sewage sludge in the stream. *See id.* at Condition L-2.

When the City's wastewater discharges exceed numerical limits or narrative conditions set in its permits, the City violates the Clean Water Act. *See* 33 U.S.C. 1311(a) (prohibiting discharges that do not comply with certain exceptions including limits set in NPDES permits). Indeed, the permits state that the City has a duty to comply with all conditions of the permit and that "[a]ny permit noncompliance constitutes a violation of the Clean Water Act and is ground for enforcement action . . ." Permit Nos. MS0020826 and MS0020303, Condition T-27. *See also* 40 C.F.R. § 122.41(a) (same).

According to the City's Discharge Monitoring Reports, the City repeatedly violates limits in Permit No. MS0020826 for Residual Chlorine, BOD, TSS, Fecal Coliform, BOD Percent Removal, and TSS Percent Removal at the North Lagoon. To illustrate the City's violations, this notice provides the following examples, as reported in the City's Discharge Monitoring Reports:

- In January 2008, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 30 mg/L permit limitation.
- In January 2008, the thirty (30) day average concentration of TSS in the discharged wastewater violates the 30 mg/L permit limitation.
- In February 2008, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 30 mg/L permit limitation.
- In February 2008, the thirty (30) day average concentration of TSS in the discharged wastewater violates the 30 mg/L permit limitation.
- In March 2008, the thirty (30) day average concentration of TSS in the discharged wastewater violates the 30 mg/L permit limitation.
- In March 2008, the suspended solids percent removal in the discharged wastewater violates the minimum required 76% permit limitation.
- In April 2008, the thirty (30) day average quantity of BOD in the discharged wastewater violates the 1000 lbs/day permit limitation.
- In April 2008, the thirty (30) day average concentration of TSS in the discharged wastewater violates the 30 mg/L permit limitation.
- In April 2008, the maximum weekly average concentration of TSS in the discharged wastewater violates the 45 mg/L permit limitation.
- In April 2008, the suspended solids percent removal in the discharged wastewater violates the minimum required 76% permit limitation.

- In September 2008, the monthly average concentration of fecal coliform in the discharged wastewater violates the 200 colonies/100 mL permit limitation.
- In October 2008, the monthly average concentration of fecal coliform in the discharged wastewater violates the 200 colonies/100 mL permit limitation.
- In October 2008, the maximum weekly average concentration of fecal coliform in the discharged wastewater violates the 400 colonies/100 mL permit limitation.
- In January 2009, the maximum weekly average concentration of fecal coliform in the discharged wastewater violates the 4000 colonies/100 mL permit limitation.
- In January 2009, the BOD percent removal in the discharged wastewater violates the minimum required 80% permit limitation.
- In May 2009, the suspended solids percent removal in the discharged wastewater violates the minimum required 76% permit limitation.
- In October 2009, the monthly average concentration of fecal coliform in the discharged wastewater violates the 200 colonies/100 mL permit limitation.
- In October 2009, the maximum weekly average concentration of fecal coliform in the discharged wastewater violates the 400 colonies/100 mL permit limitation.
- In January 2010, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 30 mg/L permit limitation.
- In January 2010, the maximum weekly average concentration of BOD in the discharged wastewater violates the 45 mg/L permit limitation.
- In January 2010, the maximum weekly average quantity of BOD in the discharged wastewater violates the 1500 lbs/day permit limitation.
- In March 2010, the maximum weekly average quantity of TSS in the discharged wastewater violates the 1500 lbs/day permit limitation.
- In March 2010, the thirty (30) day average concentration of TSS in the discharged wastewater violates the 30 mg/L permit limitation.
- In March 2010, the maximum weekly average concentration of TSS in the discharged wastewater violates the 45 mg/L permit limitation.
- In March 2010, the suspended solids percent removal in the discharged wastewater violates the minimum required 76% permit limitation.
- In April 2010, the maximum weekly average concentration of BOD in the discharged wastewater violates the 45 mg/L permit limitation.
- In May 2010, the maximum weekly average concentration of fecal coliform in the discharged wastewater violates the 400 colonies/100 mL permit limitation.
- In June 2010, the maximum weekly average concentration of fecal coliform in the discharged wastewater violates the 400 colonies/100 mL permit limitation.
- In October 2010, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 30 mg/L permit limitation.
- In October 2010, the maximum weekly average concentration of fecal coliform in the discharged wastewater violates the 400 colonies/100 mL permit limitation.
- In November 2010, the thirty (30) day average concentration of TSS in the discharged wastewater violates the 30 mg/L permit limitation.
- In December 2010, the thirty (30) day average quantity of TSS in the discharged wastewater violates the 1001 lbs/day permit limitation.
- In December 2010, the thirty (30) day average concentration of TSS in the discharged wastewater violates the 30 mg/L permit limitation.

- In December 2010, the maximum weekly average concentration of TSS in the discharged wastewater violates the 45 mg/L permit limitation.
- In January 2011, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 30 mg/L permit limitation.
- In January 2011, the thirty (30) day average concentration of TSS in the discharged wastewater violates the 30 mg/L permit limitation.
- In January 2011, the suspended solids percent removal in the discharged wastewater violates the minimum required 76% permit limitation.
- In February 2011, the thirty (30) day average quantity of TSS in the discharged wastewater violates the 1001 lbs/day permit limitation.
- In February 2011, the thirty (30) day average concentration of TSS in the discharged wastewater violates the 30 mg/L permit limitation.
- In February 2011, the maximum weekly average concentration of TSS in the discharged wastewater violates the 45 mg/L permit limitation.
- In February 2011, the monthly average chlorine residual concentration in the discharged wastewater violates the .35 mg/L permit limitation.
- In February 2011, the maximum weekly average chlorine residual concentration in the discharged wastewater violates the .6 mg/L permit limitation.
- In February 2011, the maximum weekly average concentration of fecal coliform in the discharged wastewater violates the 4000 colonies/100 mL permit limitation.
- In February 2011, the suspended solids percent removal in the discharged wastewater violates the minimum required 76% permit limitation.
- In March 2011, the thirty (30) day average concentration of TSS in the discharged wastewater violates the 30 mg/L permit limitation.
- In April 2011, the thirty (30) day average concentration of TSS in the discharged wastewater violates the 30 mg/L permit limitation.
- In April 2011, the suspended solids percent removal in the discharged wastewater violates the minimum required 76% permit limitation.
- In June 2011, the thirty (30) day average concentration of TSS in the discharged wastewater violates the 30 mg/L permit limitation.
- In June 2011, the maximum weekly average concentration of TSS in the discharged wastewater violates the 45 mg/L permit limitation.
- In July 2011, the maximum weekly average concentration of fecal coliform in the discharged wastewater violates the 400 colonies/100 mL permit limitation.

According to the City's Discharge Monitoring Reports, the City repeatedly violates limits in Permit No. MS0020303 for Residual Chlorine, BOD, TSS, Fecal Coliform, BOD Percent Removal, and TSS Percent Removal at the South Lagoon. To illustrate the City's violations, this notice provides the following examples, as reported in the City's Discharge Monitoring Reports are as follows:

- In March 2007, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 35 mg/L permit limitation.
- In March 2007, the maximum weekly average concentration of BOD in the discharged wastewater violates the 53 mg/L permit limitation.

- In March 2007, the BOD percent removal in the discharged wastewater violates the minimum required 65% permit limitation.
- In April 2007, the maximum weekly average concentration of BOD in the discharged wastewater violates the 53 mg/L permit limitation.
- In June 2007, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 35 mg/L permit limitation.
- In June 2007, the maximum weekly average concentration of BOD in the discharged wastewater violates the 53 mg/L permit limitation.
- In July 2007, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 35 mg/L permit limitation.
- In July 2007, the maximum weekly average concentration of BOD in the discharged wastewater violates the 53 mg/L permit limitation.
- In September 2007, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 35 mg/L permit limitation.
- In September 2007, the maximum weekly average concentration of BOD in the discharged wastewater violates the 53 mg/L permit limitation.
- In September 2007, the maximum weekly average concentration of fecal coliform in the discharged wastewater violates the 400 colonies/100 mL permit limitation.
- In September 2007, the monthly average concentration of fecal coliform in the discharged wastewater violates the 200 colonies/100 mL permit limitation.
- In November 2007, the maximum weekly average concentration of fecal coliform in the discharged wastewater violates the 4000 colonies/100 mL permit limitation.
- In November 2007, the monthly average concentration of fecal coliform in the discharged wastewater violates the 2000 colonies/100 mL permit limitation.
- In May 2008, the maximum weekly average concentration of fecal coliform in the discharged wastewater violates the 400 colonies/100 mL permit limitation.
- In August 2008, the maximum weekly average concentration of fecal coliform in the discharged wastewater violates the 400 colonies/100 mL permit limitation.
- In September 2008, the maximum weekly average concentration of fecal coliform in the discharged wastewater violates the 400 colonies/100 mL permit limitation.
- In September 2008, the monthly average concentration of fecal coliform in the discharged wastewater violates the 200 colonies/100 mL permit limitation.
- In June 2010, the monthly average chlorine residual concentration in the discharged wastewater violates the .14 mg/L permit limitation.
- In July 2010, the monthly average chlorine residual concentration in the discharged wastewater violates the 0.134 mg/L permit limitation.
- In August 2010, the suspended solids percent removal in the discharged wastewater violates the minimum required 65% permit limitation.
- In September 2010, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 30 mg/L permit limitation.
- In October 2010, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 30 mg/L permit limitation.
- In October 2010, the maximum weekly average concentration of BOD in the discharged wastewater violates the 45 mg/L permit limitation.
- In October 2010, the suspended solids percent removal in the discharged wastewater violates the minimum required 65% permit limitation.

- In November 2010, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 30 mg/L permit limitation.
- In November 2010, the maximum weekly average concentration of BOD in the discharged wastewater violates the 45 mg/L permit limitation.
- In November 2010, the suspended solids percent removal in the discharged wastewater violates the minimum required 65% permit limitation.
- In November 2010, the maximum weekly average concentration of fecal coliform in the discharged wastewater violates the 4000 colonies/100 mL permit limitation.
- In December 2010, the thirty (30) day average quantity of BOD in the discharged wastewater violates the 5007 lbs/day permit limitation.
- In December 2010, the maximum weekly average quantity of BOD in the discharged wastewater violates the 7511 lbs/day permit limitation.
- In December 2010, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 30 mg/L permit limitation.
- In December 2010, the maximum weekly average concentration of BOD in the discharged wastewater violates the 45 mg/L permit limitation.
- In December 2010, the suspended solids percent removal in the discharged wastewater violates the minimum required 65% permit limitation.
- In January 2011, the thirty (30) day average quantity of BOD in the discharged wastewater violates the 5007 lbs/day permit limitation.
- In January 2011, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 30 mg/L permit limitation.
- In January 2011, the maximum weekly average concentration of BOD in the discharged wastewater violates the 45 mg/L permit limitation.
- In February 2011, the thirty (30) day average quantity of BOD in the discharged wastewater violates the 5007 lbs/day permit limitation.
- In February 2011, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 30 mg/L permit limitation.
- In February 2011, the maximum weekly average concentration of BOD in the discharged wastewater violates the 45 mg/L permit limitation.
- In February 2011, the maximum weekly average concentration of fecal coliform in the discharged wastewater violates the 4000 colonies/100 mL permit limitation.
- In February 2011, the suspended solids percent removal in the discharged wastewater violates the minimum required 65% permit limitation.
- In February 2011, the monthly average chlorine residual concentration in the discharged wastewater violates the .134 mg/L permit limitation.
- In February 2011, the maximum weekly average chlorine residual concentration in the discharged wastewater violates the .23 mg/L permit limitation.
- In March 2011, the thirty (30) day average quantity of BOD in the discharged wastewater violates the 5007 lbs/day permit limitation.
- In March 2011, the maximum weekly average quantity of BOD in the discharged wastewater violates the 7511 lbs/day permit limitation.
- In March 2011, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 30 mg/L permit limitation.
- In March 2011, the maximum weekly average concentration of BOD in the discharged wastewater violates the 45 mg/L permit limitation.

- In March 2011, the thirty (30) day average concentration of TSS in the discharged wastewater violates the 90 mg/L permit limitation.
- In March 2011, the maximum weekly average concentration of TSS in the discharged wastewater violates the 135 mg/L permit limitation.
- In March 2011, the suspended solids percent removal in the discharged wastewater violates the minimum required 65% permit limitation.
- In March 2011, the monthly average chlorine residual concentration in the discharged wastewater violates the .134 mg/L permit limitation.
- In March 2011, the maximum weekly average chlorine residual concentration in the discharged wastewater violates the .23 mg/L permit limitation.
- In April 2011, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 30 mg/L permit limitation.
- In April 2011, the thirty (30) day average concentration of TSS in the discharged wastewater violates the 90 mg/L permit limitation.
- In April 2011, the suspended solids percent removal in the discharged wastewater violates the minimum required 65% permit limitation.
- In May 2011, the maximum weekly average concentration of BOD in the discharged wastewater violates the 45 mg/L permit limitation.
- In June 2011, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 30 mg/L permit limitation.
- In June 2011, the maximum weekly average concentration of BOD in the discharged wastewater violates the 45 mg/L permit limitation.
- In June 2011, the suspended solids percent removal in the discharged wastewater violates the minimum required 65% permit limitation.
- In July 2011, the thirty (30) day average quantity of BOD in the discharged wastewater violates the 5007 lbs/day permit limitation.
- In July 2011, the thirty (30) day average concentration of BOD in the discharged wastewater violates the 30 mg/L permit limitation.
- In July 2011, the maximum weekly average concentration of BOD in the discharged wastewater violates the 45 mg/L permit limitation.
- In July 2011, the suspended solids percent removal in the discharged wastewater violates the minimum required 65% permit limitation.

In addition to these violations of numerical permit limits, the City of Hattiesburg violates narrative requirements in its permits.

On June 11, 2011, GRN observed dark brown, frothy wastewater discharging from Outfall 001 at the South Lagoon into the Leaf River. *See Photo from June 11, 2011 of Leaf River, attached as Exhibit A.* The discharge turned the Leaf River darker, and this darker stream within the river extended downstream. Upon information and belief, the river turned dark from suspended solids in the wastewater discharged from the outfall, resulting in a violation of Permit MS0020303 Condition L-1 (“There shall be no discharge of floating solids . . . in other than trace amounts.”). Upon information and belief, this violation is ongoing. The discharge from the South Lagoon also produced foam in the river, which extends downstream. The foam is also a violation of Condition L-1, which upon information and belief is continuous. *See Photo from*

June 11, 2011 of Leaf River, attached as Exhibit B. Further, the discharge from the South Lagoon produces a sludge line on the river bed and sediment. *See* Photo from June 11, 2011 of Leaf River, attached as Exhibit C. This is a violation of Permit MS0020303 Condition L-2 (“The effluent shall not cause an accumulation of solids or sewage sludges in the receiving stream.”). Upon information and belief, the sludge violation is ongoing.

On August 13, 2011, GRN observed a substantial amount of floating solids in the Bouie River at a point where the City discharges wastewater from North Lagoon Outfall 001 into the Bouie River, and at points in the river just downstream of the outfall. *See* Photo from August 13, 2011 of Bouie River, attached as Exhibit D. Upon information and belief, these floating solids are from the lagoon, and as a result the City violates Permit MS0020826 Condition L-1 (“There shall be no discharge of floating solids . . . in other than trace amounts.”). Upon information and belief, this violation is ongoing.

Also on August 13, 2011, GRN observed an accumulation of solids or sewer sludges on the bottom of the Bouie River. Upon information and belief, the accumulated solids/sewer sludges are from the North Lagoon that the City discharged into the Bouie River from Outfall 001. Thus, the City violates Permit MS0020303 Condition L-2 (“The effluent shall not cause an accumulation of solids or sewage sludges in the receiving stream.”). Upon information and belief, this violation is ongoing.

The violations began by at least March 2007 and are ongoing. Gulf Restoration Network reserves the right to include in its lawsuit additional violations as those violations are discovered.

Person Giving Notice

Gulf Restoration Network is a network of environmental, social justice, and citizens’ groups in addition to individuals who are committed to restoring the Gulf of Mexico to an ecologically and biologically sustainable condition. The organization was formed in 1994 to advance environmental protection, raise awareness of environmental issues in Gulf states and to increase communication and coordination of member activities across the region. The City’s violations at the North and South Lagoons negatively impact Gulf Restoration Network members’ quality of life.

The name, address, and phone number of the person giving notice:

Gulf Restoration Network
P.O. Box 2245
New Orleans, LA 70176
(504) 525-1528

Identification of Counsel

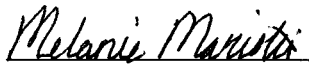
Corinne Van Dalen, SBN: 21175
Tulane Environmental Law Clinic

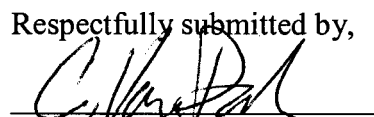
6329 Freret Street
New Orleans, LA 70118
Phone: (504) 862-8800 // Fax: (504) 862-8721

Relief Sought By Plaintiff

The Clean Water Act authorizes any citizen to “commence a civil action on his own behalf (1) against any person . . . who is alleged to be in violation of (A) an effluent standard or limitation under this Act. . . .” 33 U.S.C. § 1365(a). This provision defines “effluent standard or limitation” as “a permit or condition thereof issued under section 1342 of [the Act].” The Mississippi Department of Environmental Quality (“MDEQ”) issued Permits MS0020826 and MS0020303 to the City under section 1342 of the Act, thus Gulf Restoration Network intends to file a suit against the City to enforce violations of such permits after the 60-day notice period expires. The Act authorizes federal district courts to issue injunctions to enforce permit violations and apply appropriate civil penalties against the violator. 33 U.S.C. § 1365(a). The City could be liable for up to \$37,500 dollars for *each day* of violation. *See* 33 U.S.C. § 1319(d) (establishing maximum penalty)¹.

We believe this notice of intent to sue sufficiently states the grounds for the complaint. During the sixty-day waiting period prescribed by the Clean Water Act, we would be pleased to discuss this matter further. If you have any questions about the issues raised in this letter, or if you believe that any of our allegations are incorrect, please contact counsel at the telephone number and address provided below.


Prepared by Melanie Mariotti,
Student Attorney

Respectfully submitted by,

Corinne Van Dalen, SBN 21175
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New Orleans, LA 70118
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Counsel for Gulf Restoration Network

¹ Pursuant to the Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461, as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701, EPA increased civil penalties effective after January 12, 2009 to \$37,500 per day for each violation of the Clean Water Act. *See* Civil Monetary Penalty Inflation Adjustment Rule, 73 Fed. Reg. 75,340 (Dec. 11, 2008) (to be codified at 40 C.F.R. pts. 19, 27).

GRN Notice to City of Hattiesburg

November 4, 2011

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Cc:

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Certified Mail

Gwendolyn Keyes Fleming, Regional Administrator
EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
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Certified Mail

Trudy Fisher, Executive Director
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P. O. Box 2261
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Certified Mail

Eric Holder, Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530 – 0001

Exhibit A



Exhibit B





