January 7, 2015

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jeff L. Davis, Vice President/General Manager
Central Concrete Supply Co., Inc.
331 N. Main Street
Euless, Texas 76039

William J. Sandbrook, President
William M. Brown, Vice President/CFO
U.S. Concrete On-Site, Inc.
331 N. Main Street
Euless, Texas 76039

Capitol Corporate Services, Inc.
Agent for Service of Process
Central Concrete Supply Co., Inc. &
U.S. Concrete On-Site, Inc.
455 Capitol Mall, Suite 217
Sacramento, California 95814

Re: Notice of Violation and Intent to File Suit under the Clean Water Act

Dear Sirs:

I am writing on behalf of San Francisco Baykeeper ("Baykeeper") to give notice that Baykeeper intends to file a civil action against Central Concrete Supply, Co., Inc. and U.S. Concrete On-Site, Inc. ("Central Concrete" and/or "U.S. Concrete") for violations of the federal Clean Water Act, 33 U.S.C. § 1251 *et seq.* ("CWA") at Central Concrete's facility located at 790 Stockton Avenue, San Jose, California (the "Facility").

Baykeeper is a non-profit public benefit corporation organized under the laws of California, with its office in San Francisco, California. Baykeeper's purpose is to protect and enhance the water quality and natural resources of San Francisco Bay, its tributaries, and other waters in the Bay Area, for the benefit of its ecosystems and communities. Baykeeper has over three thousand members who use and enjoy San Francisco Bay and other waters for various recreational, educational, and spiritual purposes. Baykeeper's members' use and enjoyment of these waters are negatively affected by the pollution caused by Central Concrete's operations.

This letter addresses Central Concrete's unlawful discharge of pollutants via stormwater from the Facility to San Francisco Bay. Specifically, Baykeeper's investigation of the Facility has uncovered significant, ongoing, and continuous

violations of the CWA and the National Pollution Discharge Elimination System ("NPDES") General Permit No. CAS000001 [State Water Resources Control Board] Water Quality Order No. 92-12-DWQ, as amended by Order No. 97-03-DWQ ("Industrial Stormwater Permit").[1]

CWA section 505(b) requires that sixty (60) days prior to the initiation of a civil action under CWA section 505(a), a citizen must give notice of his or her intent to file suit. 33 U.S.C. § 1365. Notice must be given to the alleged violator, the U.S. Environmental Protection Agency ("EPA"), and the State in which the violations occur. As required by section 505(b), this Notice of Violation and Intent to File Suit provides notice to Central Concrete of the violations that have occurred and which continue to occur at the Facility. After the expiration of sixty (60) days from the date of this Notice of Violation and Intent to File Suit, Baykeeper intends to file suit in federal court against Central Concrete under CWA section 505(a) for the violations described more fully below.

During the 60-day notice period, Baykeeper is willing to discuss effective remedies for the violations noticed in this letter. We suggest that Central Concrete contact us within the next twenty (20) days so that these discussions may be completed by the conclusion of the 60-day notice period. Please note that we do not intend to delay the filing of a complaint in federal court, and service of the complaint shortly thereafter, even if discussions are continuing when the notice period ends.

I. THE LOCATION OF THE ALLEGED VIOLATIONS

A. The Facility

Central Concrete operates a concrete batch plant located at 790 Stockton Avenue in San Jose, California (the "Facility"). U.S. Concrete is Central Concrete's parent corporation. At the Facility, Central Concrete manufactures ready-mix concrete. The Facility's potential pollutants include total suspended solids ("TSS"); pH; heavy metals such as copper, iron, and nickel; cement; flyash; aggregate (sand/gravel); chemical admixtures; liquid additives, and other pollutants. The Facility has one stormwater discharge point, and stormwater is discharged indirectly to San Francisco Bay. The Facility is bounded to the northeast by Caltrain tracks; to the northwest by the Caltrain College Park Station; to the southwest by Stockton Avenue, and to the southeast by a parking lot for Salvation Army trucks.

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[1] On April 1, 2014, the State Water Resources Control Board adopted an updated NPDES General Permit for Discharges Associated with Industrial Activity, Water Quality Order No. 2014-57-DWQ, which has no force or effect until its effective date of July 1, 2015. As of the effective date, Water Quality Order No. 2014-57-DWQ will supersede and rescind the current Industrial Stormwater Permit except for purposes of enforcement actions brought pursuant to the current permit.

B. The Affected Water

San Francisco Bay is a water of the United States. The CWA requires that water bodies such as San Francisco Bay meet water quality objectives that protect specific "beneficial uses." The beneficial uses of San Francisco Bay and its tributaries include commercial and sport fishing, estuarine habitat, fish migration, navigation, preservation of rare and endangered species, water contact and non-contact recreation, shellfish harvesting, fish spawning, and wildlife habitat. Contaminated stormwater from the Facility adversely affects these beneficial uses by impairing water quality and threatening the ecosystem of the San Francisco Bay watershed, including significant habitat for listed rare and endangered species.

II. THE ACTIVITIES AT THE FACILITY CONSTITUTE VIOLATIONS OF THE CLEAN WATER ACT

It is unlawful to discharge pollutants to waters of the United States, such as San Francisco Bay, without an NPDES permit or in violation of the terms and conditions of an NPDES permit. CWA § 301(a), 33 U.S.C. § 1311(a); *see also* CWA § 402(p), 33 U.S.C. § 1342(p) (requiring NPDES permit issuance for the discharge of stormwater associated with industrial activities). The Industrial Stormwater Permit authorizes certain discharges of stormwater, conditioned on compliance with its terms.

In 1992, Central Concrete submitted a Notice of Intent ("NOI"), and a corrected NOI in 2014, to be authorized to discharge stormwater from the Facility under the Industrial Stormwater Permit. However, information available to Baykeeper indicates that stormwater discharges from the Facility have violated several terms of the Industrial Stormwater Permit, thereby violating the CWA. *Id.* Apart from discharges that comply with the Industrial Stormwater Permit, the Facility lacks NPDES permit authorization for any other discharges of pollutants into waters of the United States.

A. Discharges in Excess of BAT/BCT Levels

The Effluent Limitations of the Industrial Stormwater Permit prohibit the discharge of pollutants from the Facility in concentrations above the level commensurate with the application of best available technology economically achievable ("BAT") for toxic pollutants[2] and best conventional pollutant control technology ("BCT") for conventional pollutants.[3] Industrial Stormwater Permit, Order Part B(3). The EPA has published sector-specific Benchmark values for cement and concrete manufacturers, which apply to "discharges resulting from the runoff of rainfall which derives from the storage of materials including raw materials, intermediate products, finished products and waste materials which are used or derived from the manufacture of cement . . . ." 40

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[2] BAT is defined at 40 C.F.R. § 442.23. Toxic pollutants are listed at 40 C.F.R. § 401.15 and include copper, lead, and zinc, among others.

[3] BCT is defined at 40 C.F.R. § 442.22. Conventional pollutants are listed at 40 C.F.R. § 401.16 and include BOD, TSS, oil and grease, pH, and fecal coliform.

C.F.R. § 411.30. These values are set at the maximum pollutant concentration present if an industrial facility is employing BAT and BCT, as listed in Attachment 1 to this letter.[4]

Central Concrete's self-reported exceedances of Benchmark values over the last five (5) years, identified in Attachment 2 to this letter, indicate that Central Concrete has failed and is failing to employ measures that constitute BAT and BCT in violation of the requirements of the Industrial Stormwater Permit. Baykeeper alleges and notifies Central Concrete that its stormwater discharges from the Facility have consistently contained and continue to contain levels of pollutants that exceed Benchmark values for pH, TSS, oil and grease, and iron.

Central Concrete's ongoing discharges of stormwater containing levels of pollutants above EPA Benchmark values and BAT- and BCT-based levels of control also demonstrate that Central Concrete has not developed and implemented sufficient Best Management Practices ("BMPs") at the Facility. Proper BMPs could include, but are not limited to, moving certain pollution-generating activities under cover or indoors, capturing and effectively filtering or otherwise treating all stormwater prior to discharge, frequent sweeping to reduce the build-up of pollutants on-site, installing filters in downspouts and storm drains, and other similar measures.

Central Concrete's failure to develop and/or implement adequate pollution controls to meet BAT and BCT at the Facility violates and will continue to violate the CWA and the Industrial Stormwater Permit each and every day Central Concrete discharges stormwater without meeting BAT/BCT. Baykeeper alleges that Central Concrete has discharged stormwater containing excessive levels of pollutants from the Facility to San Francisco Bay during at least every significant local rain event over 0.1 inches in the last five (5) years.[5] Attachment 3 compiles all dates in the last five (5) years when a significant rain event occurred. Central Concrete is subject to civil penalties for each violation of the Industrial Stormwater Permit and the CWA within the past five (5) years.

B. Discharges Impairing Receiving Waters

The Industrial Stormwater Permit's Discharge Prohibitions disallow stormwater discharges that cause or threaten to cause pollution, contamination, or nuisance. *See* Industrial Stormwater Permit, Order Part A(2). The Industrial Stormwater Permit also

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[4] The Benchmark values are part of EPA's Multi-Sector General Permit ("MSGP") and can be found at: http://www.epa.gov/npdes/pubs/msgp2008_finalpermit.pdf. *See* 73 Fed. Reg. 56,572 (Sept. 29, 2008) (Final National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges From Industrial Activities). In the latest version of the permit, EPA has proposed the inclusion of Benchmark values for facilities that discharge into saltwater, which can be found at: http://water.epa.gov/polwaste/npdes/stormwater/upload/msgp2013_proposedpermit8.pdf. *See* 78 Fed. Reg. 59,672 (Sept. 27, 2013) (Draft National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges From Industrial Activities).

[5] Significant local rain events are reflected in the rain gauge data available at: http://cdec.water.ca.gov, http://lwf.ncdc.noaa.gov/oa/ncdc.html, and http://www.ncdc.noaa.gov/IPS/hpd/hpd.html (Last accessed on 12/31/14).

prohibits stormwater discharges to surface or groundwater that adversely impact human health or the environment. *Id.* at Order Part C(1). Receiving Water Limitations of the Industrial Stormwater Permit prohibit stormwater discharges that cause or contribute to an exceedance of applicable Water Quality Standards ("WQS"). *Id.* at Order Part C(2). Applicable WQS are set forth in the California Toxics Rule ("CTR")[6] and Chapter 3 of the San Francisco Bay Basin (Region 2) Water Quality Control Plan ("Basin Plan").[7] *See* Attachment 1. Exceedances of WQS are violations of the Industrial Stormwater Permit, the CTR, and the Basin Plan.

The Basin Plan establishes WQS for San Francisco Bay and its tributaries, including but not limited to the following:

- Waters shall not contain substances in concentrations that result in the deposition of material that cause nuisance or adversely affect beneficial uses.
- Waters shall not contain suspended material in concentrations that cause nuisance or adversely affect beneficial uses.
- Waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses. Increases from normal background light penetration or turbidity relatable to waste discharge shall not be greater than 10 percent in areas where natural turbidity is greater than 50 NTU.
- All waters shall be maintained free of toxic substances in concentrations that are lethal to or that produce other detrimental responses in aquatic organisms.
- Surface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use. The Basin Plan, Table 3-3, identifies specific marine water quality objectives for toxic pollutants.[8]

Baykeeper alleges that Central Concrete's stormwater discharges have caused or contributed to exceedances of the WQS set forth in the Basin Plan and CTR. These allegations are based on Central Concrete's self-reported data submitted to the San Francisco Bay Regional Water Quality Control Board, which indicates exceedances of receiving water limits for pH. *See* Attachment 2.

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[6] The CTR is set forth at 40 C.F.R. § 131.38 and is explained in the Federal Register preamble accompanying the CTR promulgation set forth at 65 Fed. Reg. 31,682 (May 18, 2000).
[7] The Basin Plan is published by the San Francisco Bay Regional Water Quality Control Board at: http://www.waterboards.ca.gov/sanfranciscobay/basin_planning.shtml#2004basinplan (Last accessed on 12/1/14).
[8] Basin Plan, Table 3-3 is available at: http://www.waterboards.ca.gov/rwqcb2/water_issues/programs/planningtmdls/basinplan/web/tab/tab_3-03.pdf (Last accessed on 12/1/14).

Baykeeper alleges that each day that Central Concrete has discharged stormwater from the Facility, Central Concrete's stormwater has contained levels of pollutants that exceeded one or more of the applicable WQS in the San Francisco Bay. Baykeeper alleges that Central Concrete has discharged stormwater exceeding WQS from the Facility to San Francisco Bay during at least every significant local rain event over 0.1 inches in the last five (5) years. *See* Attachment 3. Each discharge from the Facility that has caused or contributed, or causes or contributes, to an exceedance of an applicable WQS constitutes a separate violation of the Industrial Stormwater Permit and the CWA. Central Concrete is subject to penalties for each violation of the Industrial Stormwater Permit and the CWA within the past five (5) years.

C. Failure to Develop and Implement an Adequate Storm Water Pollution Prevention Plan

The Industrial Stormwater Permit requires dischargers to develop and implement an adequate Storm Water Pollution Prevention Plan ("SWPPP"). Industrial Stormwater Permit, Section A(1)(a). The Industrial Stormwater Permit also requires dischargers to make all necessary revisions to existing SWPPPs promptly. *Id.* at Order Part E(2).

The SWPPP must include, among other requirements, the following: a site map, a list of significant materials handled and stored at the site, a description and assessment of all potential pollutant sources, a description of the BMPs that will reduce or prevent pollutants in stormwater discharges, specification of BMPs designed to reduce pollutant discharge to BAT and BCT levels, a comprehensive site compliance evaluation completed each reporting year, and revisions to the SWPPP within 90 days after a facility manager determines that the SWPPP is in violation of any requirements of the Industrial Stormwater Permit. *See* Industrial Stormwater Permit, Section A.

Based on information available to Baykeeper, Central Concrete has failed to prepare and/or implement an adequate SWPPP and/or to revise the SWPPP to satisfy each of the requirements of Section A of the Industrial Stormwater Permit. For example, Central Concrete's SWPPP does not include, and Central Concrete has not implemented, adequate BMPs designed to reduce pollutant levels in discharges to BAT and BCT levels in accordance with Section A(8) of the Industrial Stormwater Permit, as evidenced by the data in Attachment 2.

Accordingly, Central Concrete has violated the CWA each and every day that it has failed to develop and/or implement an adequate SWPPP meeting all of the requirements of Section A of the Industrial Stormwater Permit, and Central Concrete will continue to be in violation every day until it develops and/or implements an adequate SWPPP. Central Concrete is subject to penalties for each violation of the Industrial Stormwater Permit and the CWA occurring within the past five (5) years.

D. Failure to Develop and Implement an Adequate Monitoring and Reporting Program and to Perform Annual Comprehensive Site Compliance Evaluations

The Industrial Stormwater Permit requires facility operators to develop and implement a Monitoring and Reporting Program ("MRP"). Industrial Stormwater Permit, Order Part E(3) and Section B(1). The Industrial Stormwater Permit requires that the MRP ensure that each facility's stormwater discharges comply with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations specified in the Industrial Stormwater Permit. *Id.* at Section B(2). Facility operators must ensure that their MRP practices reduce or prevent pollutants in stormwater and authorized non-stormwater discharges as well as evaluate and revise their practices to meet changing conditions at the facility. *Id.* This may include revising the SWPPP as required by Section A of the Industrial Stormwater Permit. The MRP must measure the effectiveness of BMPs used to prevent or reduce pollutants in stormwater and authorized non-stormwater discharges, and facility operators must revise the MRP whenever appropriate. *Id.* at Section B(2). The Industrial Stormwater Permit requires facility operators to visually observe and collect samples of stormwater discharges from all drainage areas. *Id.* at Section B(7). Facility operators are also required to provide an explanation of monitoring methods describing how the facility's monitoring program will satisfy these objectives. *Id.* at Section B(10).

Central Concrete has been operating the Facility with an inadequately-developed and/or inadequately-implemented MRP, in violation of the substantive and procedural requirements set forth in Section B of the Industrial Stormwater Permit. For example, the data in Attachment 2 indicates that Central Concrete's monitoring program has not ensured that stormwater discharges are in compliance with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations of the Industrial Stormwater Permit as required by Section B(2). The monitoring program has not resulted in practices at the Facility that adequately reduce or prevent pollutants in stormwater as required by Section B(2). Similarly, the data in Attachment 2 indicate that Central Concrete's MRP has not effectively identified or responded to compliance problems at the Facility or resulted in effective revision of BMPs in use or the Facility's SWPPP to address such ongoing problems as required by Section B(2).

In addition, Central Concrete's MRP is inadequate because Central Concrete has failed to collect some required samples. Section B(5)(a) requires facilities to collect stormwater samples during the first hour of discharge from the first storm event of the wet season, and at least one (1) other storm event during the wet season. During one (1) of the previous five (5) wet seasons, Central Concrete only collected samples during one (1) storm event, but was required to collect samples from two (2) storm events.

As a result of Central Concrete's failure to adequately develop and/or implement an adequate MRP at the Facility, Central Concrete has been in daily and continuous violation of the Industrial Stormwater Permit and the CWA each and every day for the past five (5) years. These violations are ongoing. Central Concrete will continue to be in

violation of the monitoring and reporting requirements each day that Central Concrete fails to adequately develop and/or implement an effective MRP at the Facility. Central Concrete is subject to penalties for each violation of the Industrial Stormwater Permit and the CWA occurring for the last five (5) years.

E. Discharges Without Permit Coverage

Section 301(a) of the CWA prohibits the discharge of any pollutant into waters of the United States unless the discharge is authorized by a NPDES permit issued pursuant to section 402 of the CWA. *See* 33 U.S.C. §§ 1311(a), 1342. Central Concrete sought coverage for the Facility under the Industrial Stormwater Permit, which states that any discharge from an industrial facility not in compliance with the Industrial Stormwater Permit "must be either eliminated or permitted by a separate NPDES permit." Industrial Stormwater Permit, Order Part A(1). Because Central Concrete has not obtained coverage under a separate NPDES permit and has failed to eliminate discharges not permitted by the Industrial Stormwater Permit, each and every discharge from the Facility described herein not in compliance with the Industrial Stormwater Permit has constituted and will continue to constitute a discharge without CWA permit coverage in violation of section 301(a) of the CWA, 33 U.S.C. § 1311(a).

III. PERSONS RESPONSIBLE FOR THE VIOLATIONS

Central Concrete Supply Co., Inc. and U.S. Concrete On-Site, Inc. are the persons responsible for the violations at the Facility described above.

IV. NAME AND ADDRESS OF NOTICING PARTY

Our name, address, and telephone number is as follows:

San Francisco Baykeeper
785 Market Street, Suite 850
San Francisco, CA 94103
(415) 856-0444

V. COUNSEL

Baykeeper is represented by the following counsel in this matter, to whom all communications should be directed:

Nicole C. Sasaki, Associate Attorney
George Torgun, Managing Attorney
San Francisco Baykeeper
785 Market Street, Suite 850
San Francisco, CA 94103
(415) 856-0444

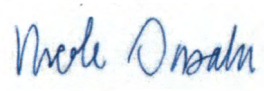
Nicole C. Sasaki: (415) 856-0444 x110, nicole@baykeeper.org
George Torgun: (415) 856-0444 x105, george@baykeeper.org

VI. REMEDIES

Baykeeper intends, at the close of the 60-day notice period or thereafter, to file a citizen suit under CWA section 505(a) against Central Concrete for the above-referenced violations. Baykeeper will seek declaratory and injunctive relief to prevent further CWA violations pursuant to CWA sections 505(a) and (d), 33 U.S.C. § 1365(a) and (d), and such other relief as permitted by law. In addition, Baykeeper will seek civil penalties pursuant to CWA section 309(d), 33 U.S.C. § 1319(d), and 40 C.F.R. § 19.4, against Central Concrete in this action. The CWA imposes civil penalty liability of up to $37,500 per day per violation for violations occurring after January 12, 2009. 33 U.S.C. § 1319(d); 40 C.F.R. § 19.4. Baykeeper will seek to recover attorneys' fees, experts' fees, and costs in accordance with CWA section 505(d), 33 U.S.C. § 1365(d).

As noted above, Baykeeper is willing during the 60-day notice period to discuss effective remedies for the violations noted in this letter. Please contact Nicole or George to initiate these discussions.

Sincerely,



Nicole C. Sasaki
Associate Attorney
San Francisco Baykeeper

Cc:

Gina McCarthy Administrator US EPA, William Jefferson Clinton Bldg. 1200 Pennsylvania Avenue, N.W. Mail Code: 1101A Washington, DC 20460	Bruce Wolfe Executive Officer Regional Water Quality Control Board San Francisco Bay Region 1515 Clay Street, Suite 1400 Oakland, CA 94612
Jared Blumenfeld Regional Administrator U.S. EPA - Region 9 75 Hawthorne Street San Francisco, CA 94105	Thomas Howard Executive Director State Water Resources Control Board 1001 I Street Sacramento, CA 95814

Attachment 1: EPA Benchmarks and Water Quality Standards for Discharges into Marine Waters

A. EPA Benchmarks (Multi-Sector General Permit)

Parameter	Units	Benchmark value	Source
pH	SU	6.0-9.0	MSGP
Total Suspended Solids	mg/L	100	MSGP
Total Suspended Solids	mg/L	50*	MSGP
Oil and Grease	mg/L	15	MSGP
Iron Total	mg/L	1.0	MSGP

* Section 8.E.5 of the MSGP specifies a more stringent Benchmark value for discharges from material storage piles at cement manufacturing facilities. *See* 40 C.F.R. § 411.30.

B. Marine Water Quality Standards (Basin Plan, Table 3-3)

Parameter	Units	Water Quality Standard	Source
pH	SU	6.5-8.5	Basin Plan

Attachment 2: Table of Exceedances for Central Concrete Batch Plant

Table containing each stormwater sampling result that exceeds EPA Benchmarks, Water Quality Standards (WQS), or both. The EPA Benchmarks and Water Quality Standards are listed in Attachment 1. All stormwater samples were reported by the Facility during the past five (5) years.

No.	Sampling Date	Parameter		Value	Units	Wet Season	Exceeds Bench-mark	Exceeds WQS
1	02/29/2012	pH	=	9.64	SU	2011-2012	√	√
2	02/29/2012	Total Suspended Solids	=	290	mg/L	2011-2012	√	
3	02/29/2012	Oil and Grease	=	77.1	mg/L	2011-2012	√	
4	02/29/2012	Iron Total	=	9	mg/L	2011-2012	√	
5	03/31/2014	pH	=	9.41	SU	2013-2014	√	√
6	03/31/2014	Total Suspended Solids	=	580	mg/L	2013-2014	√	
7	03/31/2014	Iron Total	=	12	mg/L	2013-2014	√	

Attachment 3: Alleged Dates of Exceedances by Central Concrete, January 7, 2010 to January 7, 2015

Days with precipitation one-tenth of an inch or greater, as reported by NOAA's National Climatic Data Center; San Jose, CA station, when a stormwater discharge from the Facility is likely to have occurred. http://www.ncdc.noaa.gov/cdo-web/search

2010	2011	2012	2013	2014
1/12	1/2	1/20	1/6	1/30
1/13	1/29	1/21	1/24	2/6
1/17	1/30	1/23	2/19	2/7
1/18	2/16	2/13	3/7	2/26
1/19	2/17	2/29	4/4	2/28
1/20	2/18	3/16	9/21	3/1
1/21	2/19	3/24	11/19	3/3
1/22	2/24	3/25	11/20	3/29
1/23	2/25	3/27		3/31
1/29	3/6	3/31		4/1
2/4	3/16	4/10		4/25
2/6	3/18	4/12		9/25
2/9	3/19	4/13		10/25
2/21	3/20	4/25		10/31
2/23	3/21	6/4		11/13
2/26	3/23	10/22		11/20
3/2	3/24	11/1		11/29
3/3	3/26	11/17		11/30
3/12	5/14	11/18		12/2
3/30	6/4	11/21		12/3
3/31	6/28	11/28		12/11
4/4	10/3	11/29		12/12
4/5	10/4	11/30		12/15
4/11	10/5	12/2		12/16
4/12	10/6	12/5		12/17
4/20	11/4	12/12		12/19
4/21	11/5	12/15		
5/25	11/19	12/17		
11/7	11/20	12/22		
11/19		12/23		
11/20		12/25		
11/21		12/26		
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