United States Environmental Protection Agency
Region 2
Caribbean Environmental Protection Division
City View Plaza II–Suite 7000, #48 Rd. 165 km 1.2
Guaynabo, Puerto Rico 00968-8069

FACT SHEET

DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
Toa Alta WWTP
PERMIT No. PR0020869

This Fact Sheet sets forth the principle facts and technical rationale that serve as the legal basis for the requirements of the accompanying draft permit. The draft permit has been prepared in accordance with Clean Water Act (CWA) section 402 and its implementing regulations at Title 40 of the *Code of Federal Regulations* (CFR), Parts 122 through 124, and the Intent to Issue a Water Quality Certificate (WQC) issued by the Puerto Rico Environmental Quality Board (EQB) pursuant to CWA section 401 requirements.

Pursuant to 40 CFR 124.53, the Commonwealth of Puerto Rico must either grant a certification pursuant to CWA section 401 or waive this certification before the U.S. Environmental Protection Agency (EPA) may issue a final permit. On November 18, 2013**,** EQB provided in the WQC that the allowed discharge will not cause violations to the applicable water quality standards at the receiving water body if the limitations and monitoring requirements in the WQC are met. In accordance with CWA section 401, EPA has incorporated the conditions of the **interim** WQC into the draft permit. Any changes to the interim WQC will be incorporated into the final issuance of the permit. The WQC conditions are discussed in this Fact Sheet and are no less stringent than allowed by federal requirements. Additional requirements might apply to comply with other sections of the CWA. Review and appeals of limitations and conditions attributable to the WQC were made through the applicable procedures of the Commonwealth of Puerto Rico and not through EPA procedures.

PART I. BACKGROUND

A. Permittee and Facility Description

The Puerto Rico Aqueduct and Sewer Authority (PRASA) (referred to throughout as the Permittee) has applied for **renewal on its Toa Alta WWTP** National Pollutant Discharge Elimination System (NPDES) permit. The Permittee is discharging pursuant to NPDES Permit No**. PR0020869.** The Permittee submitted **Application Form 1, and 2A dated February 28, 2013,** and applied for an NPDES permit to discharge treated wastewater from **Toa Alta WWTP,** Toa Alta**,** called the facility. The facility is classified as a **minor** discharger by EPA in accordance with the EPA rating criteria.

The Permittee owns and operates wastewater treatment plant which provides secondary treatment. Attachment A of this Fact Sheet provides a map of the area around the facility and a flow schematic of the facility.

The treatment system consists of the following:

The Toa Alta WWTP is a publicly owned treatment work (POTW) that treats sanitary wastewater through secondary treatment of the domestic sewage from the municipality of Toa Alta. It has a capacity of 0.75 MGD (monthly average), and provides secondary treatment and discharge its effluent to the La Plata River.

Sanitary wastewater is processed through the following units:

- Grit Removal System
- Comminutor
- Aeration Tank
- Aerobic Digester
- Clarifier
- Chlorination System

- Dechlorination System

Sludge is dewatered in sludge drying beds and disposed in a landfill.

Summary of Permittee and Facility Information

Permittee	Puerto Rico Aqueduct and Sewer Authority (PRASA)
Facility contact, title, phone	Mrs. Irma Lopez, Executive Director Compliance and Quality Control (787) 620-2270
Permittee (mailing) address	Puerto Rico Aqueduct and Sewer Authority P.O. Box 7066 Barrio Obrero Station Santurce, Puerto Rico 00916-7066
Facility (location) address	PR Road 861, End of Marina Street Toa Alta, PR
Type of facility	Publically-owned Treatment Works
Pretreatment program	N/A
Facility monthly average flow	0.536 MGD (in million gallons per day)
Facility design flow	0.75 MGD (in million gallons per day)
Facility classification	Minor

B. Discharge Points and Receiving Water Information

Wastewater is discharged from Outfall 001 to the La Plata River**,** a water of the United States.

The draft permit authorizes the discharge from the following discharge point(s):

Outfall	Effluent description	Outfall latitude	Outfall longitude	Receiving water name and classification
001	Secondary municipal wastewater.	18°, 23', 15" N	66°, 14', 44" W	La Plata River, Class SD waters

As indicated in the Puerto Rico Water Quality Standards (PRWQS) Regulations, the designated uses for Class SC receiving waters include:

- Primary and secondary recreation; and
- Propagation and preservation of desirable species, including threatened and endangered species.

CWA section 303(d) requires the Commonwealth of Puerto Rico to develop a list of impaired waters, establish priority rankings for waters on the list, and develop Total maximum daily loads (TMDLs) for those waters. The receiving water has been determined to have water quality impairments for one or more of the designated uses as determined by section 303(d) of the CWA. **TMDLs have been developed and approved by EPA for the following parameter: Fecal Coliforms.**

C. Compliance Orders/Consent Decrees

The Permittee has a Consent Decree with the Agency (civil action no 06-16-24 (sec)) in which the facility is included. This consent decree does not affect this permit action.

E. Summary of Basis for Effluent Limitations and Permit Conditions - General

The effluent limitations and permit conditions in the permit have been developed to ensure compliance with the following, as applicable:

- Clean Water Act section 401 certification requirements;
- NPDES regulations (40 CFR Part 122); and
- PRWQS (March 2014).

PART II. RATIONALE FOR EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

CWA section 301(b) and 40 CFR 122.44(d) require that permits include limitations more stringent than applicable technology-based requirements where necessary to achieve applicable water quality standards. In addition, 40 CFR 122.44(d)(1)(i) requires that permits include effluent limitations for all pollutants that are or may be discharged at levels that cause, have the reasonable potential to cause, or contribute to an exceedance of a water quality criterion, including a narrative criterion. The process for determining reasonable potential and calculating water quality-based effluent limits (WQBELs) is intended to protect the designated uses of the receiving water, and achieve applicable water quality criteria. Where reasonable potential has been established for a pollutant, but there is no numeric criterion for the pollutant, WQBELs must be established using (1) EPA criteria guidance under CWA section 304(a), supplemented where necessary by other relevant information; (2) an indicator parameter for the pollutant of concern; or (3) a calculated numeric water quality criterion, such as a proposed state criterion or policy interpreting the state's narrative criterion, supplemented with other relevant information, as provided in 40 CFR 122.44(d)(1)(vi).

The effluent limitations and permit conditions in the permit have been developed to ensure compliance with all federal and state regulations, including PRWQS. The basis for each limitation or condition is discussed below.

A. Effluent Limitations

The permit establishes **both Technology-based Effluent Limitations (TBELs) and WQBELs** for several pollutants and the basis for these limitations are discussed below**.**

1. **Flow:** An effluent limitation for flow has been established in the permit for 1.25 MGD as a Daily Maximum. Monitoring conditions are applied pursuant to 40 CFR 122.21(j)(4)(ii) and EQB's Intent to Issue a Water Quality Certificate.

   The frequency monitoring for flow shall be continuous with a flow meter.

2. **5-Day Biochemical Oxygen Demand (BOD_5):** The effluent concentration and percent removal limitations are based on technology-based secondary treatment standards for publicly owned treatment works (POTWs) specified in 40 CFR 133.102(a). The permit also requires influent monitoring and reporting in accordance with 40 CFR 122.44(i) to meet the requirement of the percent removal limitation (see section C.1.—Monitoring Requirements— of this Part).

3. **Total Suspended Solids (TSS):** The effluent concentration and percent removal limitations are based on technology-based secondary treatment standards for POTWs specified in 40 CFR 133.102(b). The permit also requires influent monitoring and reporting in accordance with 40 CFR 122.44(i) to meet the requirement of the percent removal limitation (see section C.1.—Monitoring Requirements— of this Fact Sheet).

4. **pH:** The effluent limitation for pH is based on technology-based secondary treatment standards for POTWs specified for Class SD D 2.c. of PRWQS, and the WQC. In no case the pH will lie outside of 6.0 to 9.0, standard pH units, except when it is altered by natural causes.

5. **Temperature:** The effluent limitation for temperature is based on the water quality criterion for all waters in Puerto Rico as specified in Rule 1303.1 D of PRWQS, and the WQC.

6. **Coliforms:** The discharge consists of domestic sewage that is a source of pathogens. To ensure that the recreational use of the water body is met, effluent limitations for fecal coliform are established in the permit and are based on the water quality criterion for **Class SD** waters as specified in Rule 1303.2 D. 2.b of PRWQS, and the WQC. Consistent with the expression of the water quality criteria for fecal coliform, EPA establishes a monitoring frequency of 5 grab samples per month to calculate a geometric mean and to monitor and report the single sample result of each of the 5 samples to comply with the effluent limitation of no more than 20 percent of the single samples must be above the single-sample maximum of 400 colonies per 100 mL.

7. **Dissolved Oxygen (DO):** The effluent limitation is based on the water quality criterion for **Class SD** waters as specified in Rule 1303.2 D.2.a of PRWQS, and the WQC.
8. **Color:** The effluent limitation is based on the water quality criterion for **Class SD** waters as specified in Rule 1303.2.D 2.d of PRWQS, and the WQC.
9. **Turbidity:** The effluent limitation is based on the water quality criterion for **Class SD** waters as specified in Rule 1303.2 D.2.e of PRWQS, and the WQC.
10. **Taste and Other Producing Substances**: The effluent limitation is based on the water quality criterion for **Class SD** waters as specified in Rule 1303.2.D2.g of PRWQS, and the WQC.
11. **Surfactants**: The effluent limitation is based on the water quality criterion for **Class SD** waters as specified in Rule 1303.2 D.2.i of PRWQS, and the WQC.
12. **Total Dissolved Solids**: The effluent limitation is based on the water quality criterion for **Class SD** waters as specified in Rule 1303.2 D.2.f of PRWQS, and the WQC.
13. **Total Phosphorus:** The effluent limitation is based on the water quality criterion for **Class SD** waters as specified in Rule 1303.2 D.2.h of PRWQS, and the WQC.
14. **Total Ammonia**: The effluent limitation is based on the water quality criterion for **Class SD** waters as specified in Rule 1303.2 D.2.m of PRWQS, and the WQC.
15. **Oil and Grease:** The effluent limitation is based on the water quality standards as specified in Rule 1303.1.H of PRWQS, and the WQC.
16. **Suspended. Colloidal or Settleable Solids**: The effluent limitation is based on the water quality standards as specified in Rule 1303.1.E of PRWQS, and the WQC.
17. **Solids and Other Matters**: The effluent limitation is based on the water quality standards as specified in Rule 1303.1.A of PRWQS, and the WQC.
18. **Total Nitrogen**: The effluent limitation is based on the water quality criterion for **Class SD** waters as specified in Rule 1303.2 D.2.h of PRWQS, and the WQC.
19. **Total Residual Chlorine, Sulfide, Mercury, and Cyanide**: The effluent limitation is based on the water quality standards as specified in Rule 1303.1.I.1 of PRWQS, and the WQC.

B. Effluent Limitations Summary Table

1. Outfall Number 001

Parameter	Units	Effluent limitations					
		Averaging period	Highest Reported Value (1)	Existing limits	Interim limits	Final limits	Basis
BOD_5	mg/L	Average monthly Average weekly	10 14	20.0 45.0	n/a	30.0 45.0	TBEL
BOD_5 percent removal	%	Daily minimum	96	85	n/a	85	TBEL
Color	Pt-Co	Daily Maximum	10	15	n/a	15	WQBEL
Cyanide, Free	µg/L	Daily maximum	5.06	5.2	n/a	5.2	WQBEL
Dissolved Oxygen	mg/L	Daily Maximum	6.03	$\geq$ 5.0	n/a	$\geq$ 5.0	WQBEL
Fecal Coliform	col/100 mL	Daily maximum	32883	200 col / 100 mL	n/a	200 col / 100 mL	WQBEL
Flow	MGD	Daily maximum	0.883	0.75	n/a	0.75	WQBEL
Mercury	µg/L	Daily maximum	0.011	0.012	n/a	0.050	WQBEL
pH	SU	Daily maximum	7.58	6.0-9.0	n/a	6.0-9.0	WQBEL

Parameter	Units	Effluent limitations					
		Averaging period	Highest Reported Value (1)	Existing limits	Interim limits	Final limits	Basis
Residual Chlorine	µg/L	Daily maximum	920	500	n/a	7.5	WQBEL
Sulfates	Mg/l	Daily Maximum	---	---	n/a	Monitor	WQBEL
Sulfide	µg/L	Daily maximum	13	2	n/a	2	WQBEL
Surfactants	µg/L	Daily maximum	42	100	n/a	100	WQBEL
Temperature	℃	Daily maximum	31.4	32.2	n/a	32.2	WQBEL
Total Ammonia	mg/L	Daily maximum	0.39	3.0	n/a	Monitor	WQBEL
Total Coliforms	col/100 mL	Daily maximum	89,554	10,000 col / 100 mL	n/a	10,000 col / 100 mL	WQBEL
Total Dissolved Solids	mg/L	Daily maximum	460	500	n/a	500	WQBEL
Total Nitrogen	µg/L	Daily maximum	---	---	n/a	1,700	WQBEL
Total Phosphorus	µg/L	Daily maximum	3740	1000	n/a	160	WQBEL
TSS	mg/L	Average monthly Average weekly	6 12	30.0 45.0	n/a	30.0 45.0	TBEL
TSS percent removal	%	Daily minimum	95	85	n/a	85	TBEL
Turbidity	NTU	Daily maximum	8.7	50	n/a	50	WQBEL

Notes, Footnotes and Abbreviations

Note: Dashes (--) indicate there are no effluent data, no limitations, or no monitoring requirements for this parameter.
(1) Wastewater data from DMRs dated June 28, 2013 to May 28, 2015.

2. Outfall 001 Narrative Limitations

a. The waters of Puerto Rico shall not contain any substance, attributable to the discharge at such concentration which, either alone or as result of synergistic effects with other substances, is toxic or produces undesirable physiological responses in humans, fish, or other fauna or flora.
b. The waters of Puerto Rico shall be substantially free from floating non petroleum oils and greases as well as petroleum derived oils and greases.
c. The waters of Puerto Rico shall not contain floating debris, scum, or other floating materials attributable to discharges in amounts sufficient to be unsightly or deleterious to the existing or designated uses of the water body.
d. Solids from wastewater sources shall not cause deposition in or be deleterious to the existing or designated uses of the waters.
e. Taste and odor-producing substances shall not be present in amounts that will interfere with primary contact recreation, or will render any undesirable taste or odor to edible aquatic life.
f. No toxic substances shall be discharged, in toxic concentrations, other than those allowed as specified in the NPDES permit, Those toxic substances included in the permit renewal application, but not regulated by the NPDES permit, shall not exceed the concentrations specified in the applicable regulatory limitations.

C. Monitoring Requirements

NPDES regulations at 40 CFR 122.48 require that all permits specify requirements for recording and reporting monitoring results. The Part III of the Permit establishes monitoring and reporting requirements to implement federal and state requirements. The following provides the rationale for the monitoring and reporting requirements for this facility.

1. **Influent Monitoring Requirements**

   To calculate percent removal values, influent monitoring is required for BOD_5 and TSS in accordance with 40 CFR 133.102. Influent monitoring must be conducted before any treatment, other than de-gritting, and before any addition of any internal waste stream.

2. **Effluent Monitoring Requirements**

   Effluent monitoring frequency and sample type have been established in accordance with the requirements of 40 CFR 122.44(i) and recommendations in EPA's TSD. Consistent with 40 CFR Part 136 monitoring data for toxic metals must be expressed as total recoverable metal. Effluent monitoring and analyses shall be conducted in accordance with EPA test procedures approved under 40 CFR Part 136, Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act, as amended. For situations where there may be interference, refer to Solutions to Analytical Chemistry Problems with Clean Water Act Methods (EPA 821-R-07-002).A licensed chemist authorized to practice the profession in Puerto Rico shall certify all chemical analyses. All bacteriological tests shall be certified by a microbiologist or licensed medical technologist authorized to practice the profession in Puerto Rico.

   The sampling point for Outfall 001 shall be located immediately after the primary flow measuring device of the effluent of the treatment system.

D. Compliance with Federal Anti-Backsliding Requirements and Puerto Rico's Anti-Degradation Policy

Federal regulations at 40 CFR 131.12 require that state water quality standards include an anti-degradation policy consistent with the federal policy. The discharge is consistent with the anti-degradation provision of 40 CFR 131.12, 72 Federal Register 238 (December 12, 2007, pages 70517-70526) and EQB's *Anti-Degradation Policy Implementation Procedure* in Attachment A of PRWQS. In addition, CWA sections 402(o)(2) and 303(d)(4) and federal regulations at 40 CFR 122.44(l) prohibit backsliding in NPDES permits. Further, the Region 2 Antibacksliding Policy provides guidance regarding relaxation of effluent limitations based on water quality for Puerto Rico NPDES permits. These anti-backsliding provisions require effluent limitations in a reissued permit to be as stringent as those in the previous permit with some exceptions where limitations may be relaxed.

- The effluent limitations in the permit are at least as stringent as the effluent limitations in the existing permit, with the exception of effluent limitations for **Mercury and Residual Chlorine**. The effluent limitations for these pollutants are less stringent that those in the existing permit. This relaxation of effluent limitations is consistent with the anti-backsliding requirements of CWA section 401(o), 40 CFR 122.44(l), EPA Region 2's Anti-backsliding Policy dated August 10, 1993, and Puerto Rico's Anti-Degradation Policy Implementation Procedure established in PRWQS. CWA Sec. 402(o)(2)(B)(i) allows backsliding if information is available which was not available at the time of permit issuance and would have justified a less stringent effluent limitation at the time of permit issuance. EPA has determined that it is appropriate to relax the effluent limitation for these parameters without violating anti-backsliding provisions of the CWA, in accordance with section 402(o)(2), since one of the exceptions to the provisions has been satisfied; and section 402(o)(3) since it complies with EQB's WQS which include antidegradation requirements. The EQB WQC constitutes a determination that the limit is sufficient to assure that the water quality standards are or will be attained.

- Existing effluent limitations for **2,4,-6 Trichlorophenol, 2,4- Dichlorophenol, 2,4- Dimethylphenol, 2,4- Dinitrophenol, 2-Chlorophenol, 2,Methyl-4,6 -Dinitrophenol, Pentachlorophenol, Phenol, Arsenic, Cyanide, Fluoride, Lead, and Silver** have been removed based on CWA section 402(o)(2)(B)(i). CWA section 402(o)(2)(B)(i) authorizes the backsliding of effluent limitations if information is available which was not available at the time of permit issuance that would have justified the application of a less stringent effluent limitation at the time of permit issuance. Based on review of effluent data since issuance of the existing permit, the modified discharge does not show a reasonable potential for the exceedance of water quality criteria for these parameters.

PART III. RATIONALE FOR STANDARD AND SPECIAL CONDITIONS

A. Standard Conditions

In accordance with 40 CFR 122.41, standard conditions that apply to all NPDES permits have been incorporated by reference in Part IV.A.1 of the permit and expressly in Attachment B of the permit. The Permittee must comply with all standard conditions and with those additional conditions that are applicable to specified categories of permits under 40 CFR 122.42 and specified in Part IV.A.2 of the Permit.

B. Special Conditions

In accordance with 40 CFR 122.42 and other regulations cited below, special conditions have been incorporated into the permit. This section addresses the justification for special studies, additional monitoring requirements, Best Management Practices, Compliance Schedules, and/or special provisions for POTWs as needed. The special conditions for this facility are as follows:

1. **Special Conditions from the Water Quality Certificate**

   In accordance with 40 CFR 124.55, EPA has established Special Conditions from the WQC in the permit that EQB determined were necessary to meet PRWQS. The Special Conditions established in this section are only those conditions from the IWQC that have not been established in other parts of the permit.

2. **Whole Effluent Toxicity Testing**
   EPA has imposed the quarterly testing requirement to collect data necessary to determine whether this discharge has the reasonable potential to cause or contribute to an exceedance of Puerto Rico's water quality standards for toxicity, pursuant to water quality based permitting requirements at 40 CFR 122.44(d)(1), which requires EPA and delegated states to evaluate each National Pollutant Discharge Elimination System (NPDES) permit for the potential to exceed state numeric or narrative water quality standards, including those for toxics, and to establish effluent limitations for those facilities with the "reasonable potential" to exceed those standards. These federal regulations require both chemical specific limits, based on the state numeric water quality standards or other criteria developed by EPA, and whole effluent toxicity effluent limits.

3. **Best Management Practices (BMP) Plan**

   In accordance with 40 CFR 122.2 and 122.44(k), BMPs are schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution to waters of the United States. The Permittee is required to develop a BMP Plan in Part IV.B.3.a of the permit to control or abate the discharge of pollutants.

4. **Compliance Schedules**

   A compliance schedule has not been authorized for any pollutant or parameter in the permit on the basis of 40 CFR 122.47.

PART IV. COMPLIANCE WITH APPLICABLE PROVISIONS OF OTHER FEDERAL LAWS OR EXECUTIVE ORDERS

A. Coastal Zone Management Act – Not Applicable.

B. Endangered Species Act

Under 40 CFR 122.49(c), EPA is required pursuant to section 7 of the Endangered Species Act (ESA), 16 U.S.C. 1531 *et seq*. and its implementing regulations (50 CFR Part 402) to ensure, in consultation with the National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (USFWS) that the discharge authorized by the permit is not likely to jeopardize the continued existence of any endangered or threatened species or adversely affect its critical habitat**.** On April 16, 2009, EPA designated PRASA (a non-Federal representative) to conduct informal consultations or prepare a biological assessment for Section 7 Consultations, according to 50 CFR 402.8. In the past, no federally listed endangered or threatened species, or critical habitat, are in the vicinity

of the discharge. Therefore, it has been determined that the discharge is not likely to affect species or habitat listed under the ESA.

C. Environmental Justice – Not Applicable.

D. Coral Reef Protection - Not Applicable.

E. Climate Change

EPA has considered climate change when developing the conditions of the permit. This is in accordance with the draft *National Water Program 2012 Strategy: Response to Climate Change* that identifies ways to address climate change impacts by NPDES permitting authorities (77 Federal Register 63, April 2, 2012, 19661-19662). Climate change is expected to affect surface waters in several ways, affecting both human health and ecological endpoints. As outlined in the draft National Water Program 2012 Strategy, EPA is committed to protecting surface water, drinking water, and ground water quality, and diminishing the risks of climate change to human health and the environment, through a variety of adaptation and mitigation strategies. These strategies include encouraging communities and NPDES permitting authorities to incorporate climate change strategies into their water quality planning, encouraging green infrastructure and recommending that water quality authorities consider climate change impacts when developing water load and load allocations for new TMDLs, identifying and protecting designated uses at risk from climate change impacts. The 2010 *NPDES Permit Writers' Manual* also identifies climate change considerations for establishing low-flow conditions that account for possible climatic changes to stream flow. The conditions established in the permit are consistent with the draft National Water Program 2012 Strategy.

F. National Historic Preservation Act – Not applicable since this is a renovation.

G. Magnuson-Stevens Fishery Conservation and Management Act - Not Applicable.

PART V. PUBLIC PARTICIPATION

The procedures for reaching a final decision on the draft permit are set forth in 40 CFR Part 124 and are described in the public notice for the draft permit, which is published in **El Vocero**. Included in the public notice are requirements for the submission of comments by a specified date, procedures for requesting a hearing and the nature of the hearing, and other procedures for participation in the final agency decision. EPA will consider and respond in writing to all significant comments received during the public comment period in reaching a final decision on the draft permit. Requests for information or questions regarding the draft permit should be directed to

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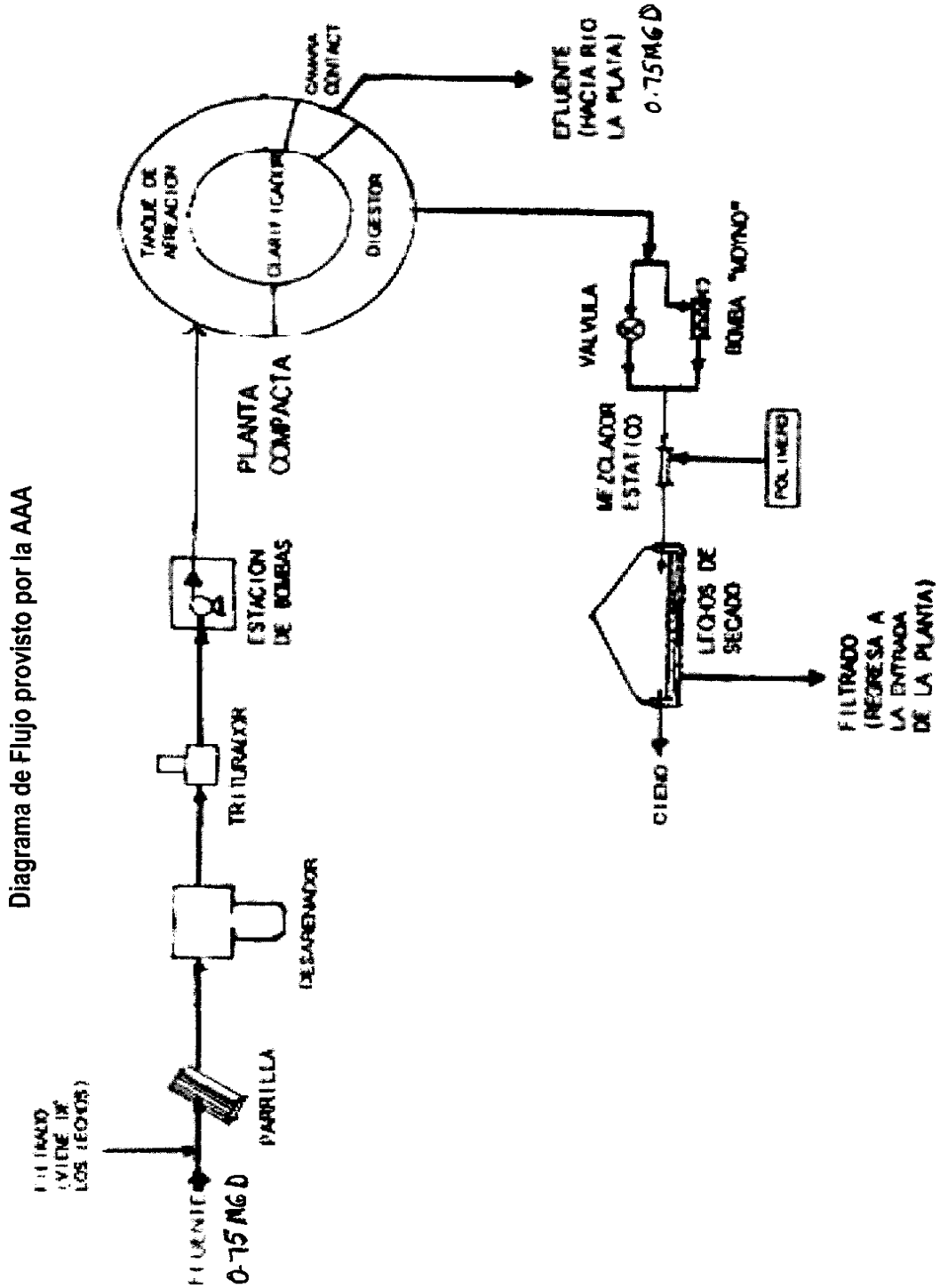
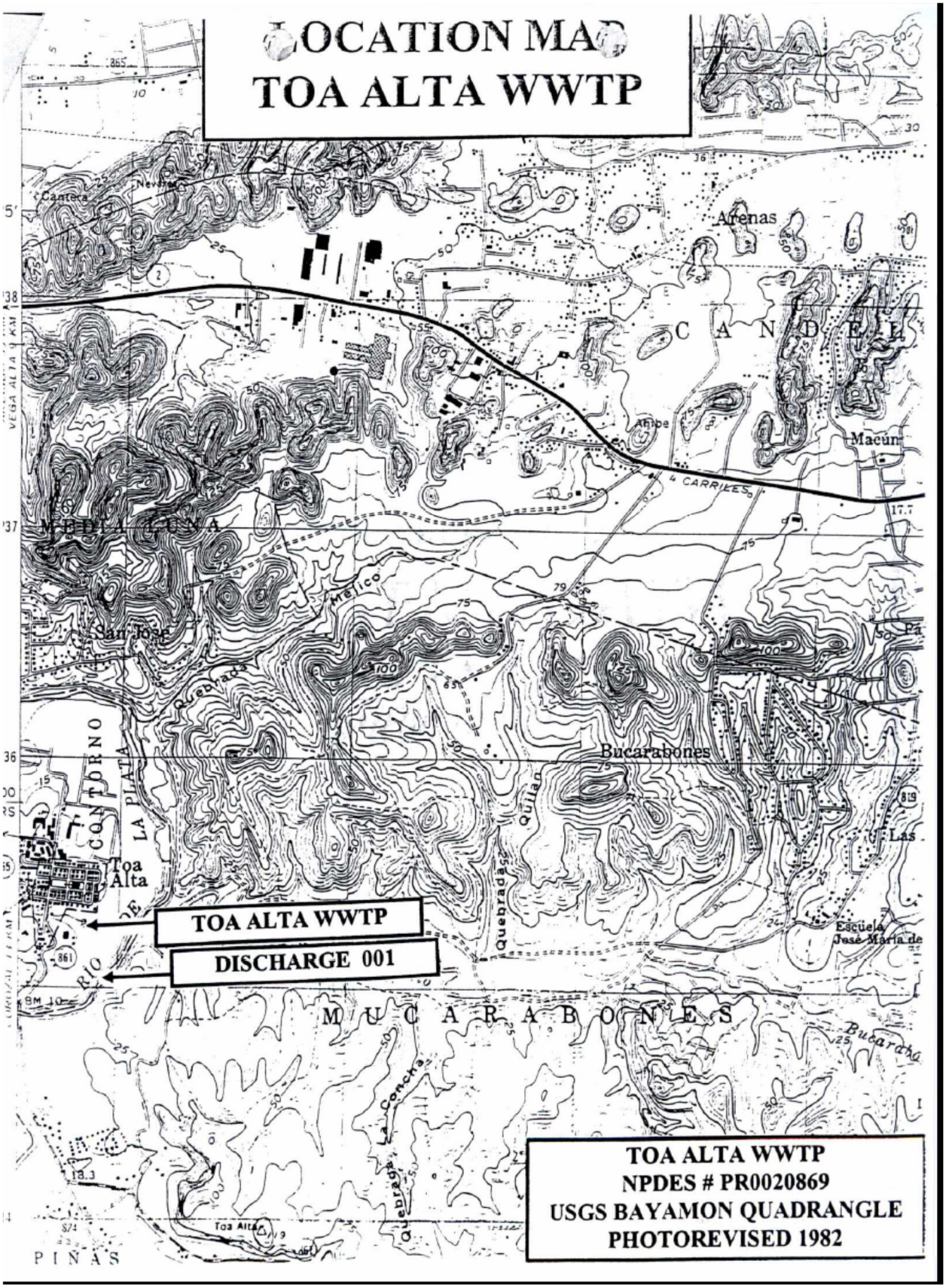
Permit Writer Phone: 787-977-5848
Permit Writer Email: laguer.yasmin@epa.gov

A copy of the draft permit is also available on EPA's website at www.epa.gov/region02/water/permits.html.

ATTACHMENT A — FACILITY MAP AND FLOW SCHEMATIC

The facility map and flow schematic are attached as provided by the discharger in the application.




LOCATION MAP
TOA ALTA WWTP
Canteca
Arenas
C A N D E L A
Atipe
Macún
4 CARRILES
MEDIA LUNA
Melico
San José
Quebrada
CONTORNO
LA PLATA
Bucarabones
Quebrada Quilan
Las
Toa Alta
TOA ALTA WWTP
DISCHARGE 001
RIO
Escuela José María de
M U C A R A B O N E S
Bucarabones
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