

DOCKET NO. D-2008-035-2

DELAWARE RIVER BASIN COMMISSION

Discharge to the Drainage Area of Special Protection Waters

**Yukiguni Maitake Manufacturing Corporation of America
Industrial Wastewater Treatment Plant and Septic Field
Mamakating Township, Sullivan County, New York**

PROCEEDINGS

This docket is issued in response to an Application submitted to the Delaware River Basin Commission (DRBC or Commission) by Cornerstone Engineering, PLLC on behalf of Yukiguni Maitake Manufacturing Corporation of America (YMMCA or docket holder) on August 29, 2013 (Application), for renewal to construct geothermal, process water, and septic system discharge facilities to service the docket holder's proposed pilot-scale mushroom growing facility (1-story, 44,100 square foot building). State Pollutant Discharge Elimination System (SPDES) Permit No. NY0264903 for these facilities was issued by the New York State Department of Environmental Conservation (NYSDEC) on September 11, 2009, effective October 1, 2009. Renewal of the SPDES Permit is expected shortly.

The Application was reviewed for approval under Section 3.8 of the *Delaware River Basin Compact*. The Sullivan County Planning Department has been notified of pending action. A public hearing on this project was held by the DRBC on September 9, 2014.

A. DESCRIPTION

1. Purpose. The purpose of this docket is to renew approval of the wastewater treatment facilities and three land discharges from the proposed pilot-scale mushroom growing facility. Two of the three discharges will be to a three-bay infiltration basin system. The third will be to an on-site septic tank which will discharge to a leach field. The three-bay infiltration basin system will accept up to 55,000 gallons per day (gpd), 51,000 gpd of which will be from the geothermal system (Outfall No. 005) and the remaining 4,000 gpd will be from process water (Outfall No. 002). The on-site septic tank and leach field will receive up to 1,000 gpd of sanitary wastewater (Outfall No. 001). The docket holder intends to construct a full scale mushroom growing facility (2-story, 428,910 square foot building) after the evaluation of the pilot-scale operations. This docket renews approval of only the pilot-scale mushroom facility's discharges. Prior to the initiation of construction of the full scale facilities, the docket holder shall apply for

and obtain DRBC approval of a docket modification for the wastewater facilities and discharge from the full scale facility (see DECISION Condition II.i.).

2. **Location.** The pilot-scale mushroom growing facility’s discharges will be located in the Basher Kill watershed near River Mile 253.64 – 9.26 – 12.3 (Delaware River – Neversink River – Basher Kill), within the drainage area to the Middle Delaware Special Protection Waters (SPW), in Mamakating Township, Sullivan County, New York as follows:

OUTFALL NO.	LATITUDE (N)	LONGITUDE (W)
001	41° 35’ 19”	74° 27’ 56”
002	41° 35’ 14”	74° 27’ 54”
005	41° 35’ 14”	74° 27’ 54”

3. **Area Served.** The three project discharges will serve the docket holder’s pilot-scale mushroom growing facility. For the purpose of defining the Area Served, Section B (Type of Discharge) and D (Service Area) of the docket holder’s Application are incorporated herein by reference, to the extent consistent with all other conditions contained in the DECISION Section of this docket.

4. **Physical Features.**

a. **Design Criteria.** The docket holder will construct the pilot-scale mushroom growing facility that will discharge up to 55,000 gpd of geothermal system and process wastewater to an on-site open air three-bay infiltration basin system (Outfalls Nos. 002 and 005 will discharge to the same basin). Geothermal system water will consist solely of non-contact cooling water (NCCW) from the heat transfer mechanisms located within the pilot-scale facility that will utilize groundwater from Well No. PW-2 with natural temperatures of between 50 and 52 degrees F to assist in the cooling of the pilot-scale facility. The geothermal system will discharge 51,000 gpd through Outfall No. 005 to the three-bay infiltration basin system. There will be no treatment for the geothermal system water prior to discharge from Outfall No. 005. Process water from the pilot-scale facility will be collected from floor drains throughout the facility. There will be no treatment other than solids removal for the process water prior to discharge from Outfall No. 002.

The three-bay infiltration basin system will be installed in its final configuration prior to operation of the pilot facility. The three bay infiltration basin system is designed to not only handle discharges from Outfalls Nos. 002 and 005, but stormwater falling on its surface from the 100 year event

An on-site septic tank and leach field will also be constructed to treat and dispose of up to 1,000 gpd of sanitary wastewater generated by the pilot-scale facility.

In addition, there are 2 proposed detention basins on-site that will receive the majority of stormwater from the site (see FINDINGS Section). Stormwater Management Basin No. 1 at the south side of the property will act as an infiltration basin. Stormwater Management Basin No. 2 will be constructed as part of the full scale facility that will be reviewed by the Commission at a

later date. Stormwater Management Basin No. 2 has been redesigned by the docket holder to accommodate the 100-year storm event for approximately 60%-70% of the site.

b. Facilities. The docket holder's pilot-scale facility will discharge 55,000 gpd of untreated water to an on-site open air three-bay infiltration basin system. The bulk (93%) of the discharge will be from the docket holder's once through non-contact geothermal cooling water system. The once through non-contact geothermal cooling water system utilizes groundwater withdrawn from on-site Well No. PW-2 to mimic seasonal temperatures within the facility, which are designed to encourage mushroom growth. The NCCW will be discharged, untreated, to the on-site three-bay infiltration basin system via Outfall No. 005.

The pilot-scale facility will utilize a sawdust mixture similar to that of the docket holder's facilities in Japan to aid in the growing process. A bay will be constructed on-site to house part of the mixture, which will then be finalized inside the pilot-scale facility. The docket holder expects a single complete growing process to take roughly 3-4 months.

The "Autumn" room of the pilot-scale facility is the source of most of the process water (90%-95% of the 4,000 gpd). The mushrooms are harvested in the "Autumn" room. The sawdust mixture utilized in the mushroom growing process is gathered in the "Autumn" room and proposed to be taken off-site for use as horse feed and/or fertilizer. The mushrooms are cleaned and sent to the processing room. The "Autumn" room is cleaned with a natural cleaning agent. The NYSDEC has required the docket holder to inform them of the use of any slimicides, algaecides, biocides, corrosion inhibitors, anti-scaling compounds, or other water treatment chemicals prior to their use, but presently none are proposed. Process water is collected through floor drains in the "Autumn" room and directed to the three-bay infiltration basin system for discharge from Outfall No. 002. Solids are removed from the Process water by initial floor screens and ultimately by an Abtech Ultra Urban™ Filter installed in the catch basin prior to discharge. No other treatment of the process water is proposed.

Sanitary waste from the site is sent to a 1,000 gpd septic tank that discharges to a leach field on-site via Outfall No. 001.

As a condition of SPDES Permit No. NY0264903, the NYSDEC has required the docket holder to: install 4 monitoring wells (1 up gradient and 3 down gradient of the infiltration basin) to ensure the groundwater is not being adversely affected by the geothermal and process water discharge; and to configure the infiltration basin so that it has three bays. The NYSDEC also requires that no bay shall be in operation for more than two weeks at a time. Furthermore, after a bay has been used, the docket holder must wait twice the length for which it was used before utilizing it again (See FINDINGS Section).

The docket holder's pilot facility will not be staffed 24 hours per day, and shall have a remote alarm system that continuously monitors plant operations installed during construction (See DECISION Condition II.v.).

The docket holder's pilot facility has not prepared and implemented an emergency management plan (EMP) due to the fact that construction has not yet started for the

facility. DECISION Condition II.w. requires the docket holder to submit an EMP for review and approval by the Executive Director prior to the start of construction of the pilot-scale facility.

The docket holder's geothermal system and process water discharge, as well as the septic system will utilize a land discharge via an infiltration basin and leach field, respectively. The docket holder has therefore satisfied the natural wastewater treatment technologies requirement.

The project facilities are not located in the 100-year floodplain.

The byproduct of the docket holder's mushroom growing facility will be utilized as either horse feed or fertilizer. No sludge will be created.

c. Water withdrawals. The potable water supply for the pilot-scale and full scale facility will be supplied by the docket holder's ground water withdrawal, which was approved via Docket No. D-2003-026-1 on December 9, 2009.

d. SPDES Permit / DRBC Docket. SPDES Permit No. NY0264903 was issued by the NYSDEC on September 11, 2009 (effective October 1, 2009) and includes final effluent limitations for the project discharge of 0.056 mgd to an on-site infiltration basin and leach field. The following average monthly effluent limit is among those listed in the SPDES Permit and meets or is more stringent than the effluent requirements of the DRBC for the leach field discharge.

EFFLUENT TABLE A-1: DRBC Parameters Included in SPDES Permit

OUTFALL 001 (Leach Field)		
PARAMETER	LIMIT	MONITORING
pH (Standard Units)	6.5 to 8.5 at all times	As required by NPDES Permit

The following average monthly effluent limits are among those listed in the SPDES Permit and meet or are more stringent than the effluent requirements of the DRBC for the process wastewater discharge.

EFFLUENT TABLE A-2: DRBC Parameters Included in SPDES permit

OUTFALL 002 (Process Wastewater)		
PARAMETER	LIMIT	MONITORING
pH (Standard Units)	6 to 9 at all times	As required by SPDES permit
Nitrate + Nitrite as N	20 mg/l (daily max)	As required by SPDES permit

The requirements in EFFLUENT TABLE A-3 are not listed in the SPDES Permit, but are Commission basin-wide and/or SPW specific parameters that were included in Docket No. D-2008-035-1 and must be monitored as a condition of this docket approval. Commission staff have requested NYSDEC include these parameters in their Permit. Monitoring shall begin upon completion of construction of the pilot-scale facility for each parameter (See DECISION Condition II.d.).

EFFLUENT TABLE A-3: DRBC Parameters Not Included in SPDES permit

OUTFALL 002 (Process Wastewater)		
PARAMETER	LIMIT	MONITORING
Total Dissolved Solids	1,000 mg/l	Monthly *
Total Suspended Solids	30 mg/l	Monthly
BOD (5-Day at 20° C)	25 mg/l	Monthly
Ammonia Nitrogen	20 mg/l	Monthly
TKN (5/1 – 9/30)	Monitor & Report	Monthly
Dissolved Oxygen (5/1 – 9/30)	Monitor & Report	Monthly
Phosphorus (5/1 – 9/30)	Monitor & Report	Monthly

* See DECISION Condition II.aa.

The following average monthly effluent limits are among those listed in the SPDES Permit and meet or are more stringent than the effluent requirements of the DRBC for the geothermal discharge.

EFFLUENT TABLE A-4: DRBC Parameters Included in SPDES permit

OUTFALL 005 (Geothermal)		
PARAMETER	LIMIT	MONITORING
pH (Standard Units)	6 to 9 at all times	As required by SPDES permit
Nitrates & Nitrites as N	20 mg/l (daily max)	As required by SPDES permit

- e. **Cost.** The overall cost of this project is estimated to be \$7,270,000.

B. FINDINGS

The purpose of this docket is to renew approval of the wastewater treatment facilities and three land discharges from the proposed pilot-scale mushroom growing facility. Two of the three discharges will be to a three-bay infiltration basin system. The third will be to an on-site septic tank which will discharge to a leach field. The three-bay infiltration basin system will accept up to 55,000 gpd, 51,000 gpd of which will be from the geothermal system (Outfall No. 005) and the remaining 4,000 gpd will be from process water (Outfall No. 002). The on-site septic tank and leach field will receive up to 1,000 gpd of sanitary wastewater (Outfall No. 001).

SPDES Permit No. NY0264903 requires the docket holder to install 4 monitoring wells (1 up gradient and 3 down gradient of the infiltration basin) to analyze the effects of the geothermal and process water discharge on the aquifer. Once installed, the monitoring wells shall be developed by pumping to remove fine sediment from the formation close to the well in accordance with standard accepted practices. The wells shall be surveyed for position and top of well casing elevation. Manual water level measurements shall be made in the wells at least monthly, during the first year of operation as detailed in the SPDES Permit for the infiltration basin. Thereafter, manual measurements shall be made on a quarterly basis. Commission staff participated in discussions with NYSDEC and the docket holder about the groundwater monitoring plan during review of Docket No. D-2008-035-1 and concur with the monitoring

requirements in the SPDES Permit. Copies of the water level reports shall be submitted with the Commission's annual effluent monitoring reports that are to be submitted by January 31 each year for the prior year's data (See DECISION Condition II.d.).

Commission staff also recommend continuation of the requirement for the docket holder to install pressure transducers/data loggers in each of the four monitoring wells. These transducers shall be corrected for atmospheric pressure changes by utilizing barometrically compensated transducers or by correcting the measurements using a locally installed barometric pressure logger (See DECISION Condition II.f.). All of the transducer's internal clocks shall be synchronized with respect to each other and local time and be set to take a water level reading at least every one-half hour. This monitoring shall be conducted for a period of one year following start-up of the pilot-scale facility and the results of this monitoring shall also be included in the annual effluent monitoring report required by January 31 of the year after which it is complete (See DECISION Condition II.d.).

NYSDEC's SPDES Permit No. NY0264903 also requires the docket holder to configure the infiltration basin system so that it has three bays. The Permit requires that no individual bay shall be in operation for more than two weeks at a time. Furthermore, after a bay has been used, the Permit requires that the docket holder must wait twice the length for which it was used before utilizing it again (i.e. if a bay is used for 2 weeks it must not be discharged to for four weeks afterward). Commission staff participated in discussions with NYSDEC and the docket holder about the infiltration basin system design during review of Docket No. D-2008-035-1 and concur with the 3 bay requirement included in the SPDES Permit.

In addition, this docket continues the requirement that a third bay may not be used until the first bay used in sequence has been completely drained of water discharged into it (See DECISION Condition II.g.). If a situation arises where one bay is completely full and a second bay is more than half full through half of its expected use, the docket holder is to notify both the NYSDEC and the DRBC that an infiltration problem may be occurring. In such a situation, upon completion of the filling of the second bay, the facility shall cease its discharge to the three-bay infiltration basin until such time as the docket holder can remedy the situation. Facility shutdown may be the result of such an occurrence if deemed to be necessary by the NYSDEC and/or the DRBC.

The NYSDEC has required YMMCA to submit an "Evaluation Report" for the pilot facility within 60 days after the initial year of operation. DECISION Condition II.h. requires the docket holder provide a copy of the report to the DRBC at the same time.

SPW Requirements

In 1992, the DRBC adopted SPW requirements, as part of the DRBC *Water Quality Regulations (WQR)*, designed to protect existing high water quality in applicable areas of the Delaware River Basin. One hundred twenty miles of the Delaware River from Hancock, New York downstream to the Delaware Water Gap has been classified by the DRBC as SPW. This stretch includes the sections of the river federally designated as "Wild and Scenic" in 1978 -- the Upper Delaware Scenic and Recreational River and the Delaware Water Gap National

Recreation Area -- as well as an eight-mile reach between Milrift and Milford, Pennsylvania which is not federally designated. The SPW regulations apply to this 120-mile stretch of the river and its drainage area.

On July 16, 2008, the DRBC approved amendments to its *WQR* that provide increased protection for waters that the Commission classifies as SPW. The portion of the Delaware River and its tributaries within the boundary of the Lower Delaware River Management Plan Area was approved for SPW designation and clarity on definitions and terms were updated for the entire program.

Article 3.10.3A.2.e.1). and 2). of the Commission's *WQR* states that projects subject to review under Section 3.8 of the Compact that are located in the drainage area of SPW must submit for approval a Non-Point Source Pollution Control Plan (NPSPCP) that controls the new or increased non-point source loads generated within the portion of the docket holder's service area which is also located within the drainage area of SPW. The service area of the docket holder is located within in the drainage area to the SPW. Since this project does entail construction of facilities (i.e., there are new or increased non-point source loads associated with this approval), the NPSPCP requirement is applicable at this time. The NPSPCP for the pilot-scale facility has been reviewed by Commission staff and has been found to be acceptable. Accordingly, DECISION Condition II.u. has been included in this docket.

Article 3.10.3 A.2.c.2) of the Commission's *WQR* requires new wastewater treatment facilities to evaluate natural treatment technology alternatives within SPW. The docket holder's geothermal system and process water discharge, as well as the septic system will utilize a land discharge via an infiltration basin and leach field, respectively. The docket holder has therefore satisfied the natural wastewater treatment technologies requirement.

In addition to handling the geothermal system and process water discharge, the open air three-bay infiltration basin system is designed to handle more than 8.0 inches of direct rainfall / 24 hours (therefore accommodating more than the 100 year rain event). The infiltration basin will be installed in its final configuration prior to operation of the pilot facility. The majority of the stormwater on-site is directed to two proposed detention basins. The basins are designed in accordance with the New York State Stormwater Management Design Manual (August 2003). The docket holder prepared a stormwater pollution prevention plan (SWPPP) for the NYSDEC in August 2008 and submitted it shortly thereafter. NYSDEC approved the SWPPP via general SPDES Permit No. NY0264903 on September 11, 2009. For NY projects subject to the Commission's NPSPCP requirements, Commission staff has generally accepted projects with a SWPPP approved by NYSDEC as satisfying the Commission's SPW NPSPCP requirement.

Other

The project does not conflict with the Comprehensive Plan and is designed to prevent substantial adverse impact on the water resources related environment, while sustaining the current and future water uses and development of the water resources of the Basin.

The effluent limits in the SPDES Permit are in compliance with Commission effluent quality requirements, where applicable.

The project is designed to produce a discharge meeting the effluent requirements as set forth in the Commission's *WQR*.

C. DECISION

I. Effective on the approval date for Docket No. D-2008-035-2 below, Docket No. D-2008-035-1 is terminated and replaced by Docket No. D-2008-035-2.

II. The project and appurtenant facilities as described in Section A "Physical Features" of this docket are approved pursuant to Section 3.8 of the *Compact*, subject to the following conditions:

a. Docket approval is subject to all conditions, requirements, and limitations imposed by the NYSDEC in its SPDES Permit, and such conditions, requirements, and limitations are incorporated herein, unless they are less stringent than the Commission's.

b. The facility and operational records shall be available at all times for inspection by the DRBC.

c. The facility shall be operated at all times to comply with the requirements of the Commission's *WQR*.

d. The docket holder shall comply with the requirements contained in the EFFLUENT TABLES in Section A.4.d. of this docket. The docket holder shall submit the required monitoring results electronically to the DRBC Project Review Section via email aemr@drbc.state.nj.us on the **Annual Effluent Monitoring Report Form** located at this web address: <http://www.state.nj.us/drbc/programs/project/application/index.html>. The monitoring results shall be submitted annually, absent any observed limit violations, by January 31. If a DRBC effluent limit is violated, the docket holder shall submit the result(s) to the DRBC within 30 days of the violation(s) and provide a written explanation that states the action(s) the docket holder has taken to correct the violation(s) and protect against any future violations.

e. Except as otherwise authorized by this docket, if the docket holder seeks relief from any limitation based upon a DRBC water quality standard or minimum treatment requirement, the docket holder shall apply for approval from the Executive Director or for a docket revision in accordance with Section 3.8 of the *Compact* and the *Rules of Practice and Procedure*.

f. The docket holder shall install pressure transducers/data loggers in each of the four monitoring wells. These transducers shall be corrected for atmospheric pressure changes by utilizing barometrically compensated transducers or by correcting the measurements using a locally installed barometric pressure logger.

g. The third bay of the infiltration basin may not begin to be filled if the first bay has not completely drained. The docket holder shall notify both the NYSDEC and the DRBC if the first bay has not completely drained after the use of the second bay has continued past half of the running time of the first bay. The docket holder shall notify both the NYSDEC and the DRBC that an infiltration problem may be occurring. In such a case, upon completion of the filling of the second bay, the facility shall cease its discharge to the three-bay infiltration basin until such time as the docket holder can remedy any infiltration problems that have arisen. Facility shutdown may be required by the NYSDEC and/or the DRBC if the three-bay infiltration basin is not operating as designed.

h. The docket holder shall submit a copy of the “Evaluation Report” for the pilot facility within 60 days after the initial year of operation.

i. The docket holder intends to construct a full scale mushroom growing facility (2-story, 428,910 square foot building) within three years of the evaluation of the pilot-scale operations. This docket approves only the pilot-scale mushroom facility’s discharges. Prior to the initiation of the construction of the full scale facilities, the docket holder shall apply for and obtain DRBC approval of a docket modification for the wastewater facilities and discharge from the full scale facility.

j. If at any time the receiving treatment plant proves unable to produce an effluent that is consistent with the requirements of this docket approval, no further connections shall be permitted until the deficiency is remedied.

k. Nothing herein shall be construed to exempt the docket holder from obtaining all necessary permits and/or approvals from other State, Federal or local government agencies having jurisdiction over this project.

l. Sound practices of excavation, backfill and reseedling shall be followed to minimize erosion and deposition of sediment in streams.

m. Within 10 days of the date that construction of the project has started, the docket holder shall notify the DRBC of the starting date and scheduled completion date.

n. Within 30 days of completion of construction of the approved project, the docket holder is to submit to the attention of the Project Review Section of DRBC a Construction Completion Statement (“Statement”) signed by the docket holder’s professional engineer for the project. The Statement must (1) either confirm that construction has been completed in a manner consistent with any and all DRBC-approved plans or explain how the as-built project deviates from such plans; (2) report the project’s final construction cost as such cost is defined by the project review fee schedule in effect at the time the application was made; and (3) indicate the date on which the project was (or is to be) placed in operation. In the event that the final project cost exceeds the estimated cost used by the docket holder to calculate the DRBC project review fee, the statement must also include (4) the amount of any outstanding balance owed for DRBC review. The outstanding balance will equal the difference between the fee paid to the Commission and the fee calculated on the basis of the project’s final cost, using the formula and

definition of “project cost” set forth in the DRBC’s project review fee schedule in effect at the time application was made.

o. This docket approval shall expire three years from date below unless prior thereto the docket holder has commenced operation of the subject project or has expended substantial funds (in relation to the cost of the project) in reliance upon this docket approval.

p. The docket holder is permitted to treat and discharge wastewaters as set forth in the Area Served Section of this docket, which incorporates by reference Sections B (Type of Discharge) and D (Service Area) of the docket holder’s Application to the extent consistent with all other conditions of this DECISION Section.

q. The docket holder shall discharge wastewater in such a manner as to avoid injury or damage to fish or wildlife and shall avoid any injury to public or private property.

r. No sewer service connections shall be made to newly constructed premises with plumbing fixtures and fittings that do not comply with water conservation performance standards contained in Resolution No. 88-2 (Revision 2).

s. Nothing in this docket approval shall be construed as limiting the authority of DRBC to adopt and apply charges or other fees to this discharge or project.

t. The issuance of this docket approval shall not create any private or proprietary rights in the waters of the Basin, and the Commission reserves the right to amend, suspend or rescind the docket for cause, in order to ensure proper control, use and management of the water resources of the Basin.

u. The docket holder’s NPSPCP meets the general requirements of Article 3.10.3.A.2.e.1) of the Commission’s *WQR*.

v. The docket holder shall install remote alarm controls as part of the construction of the pilot-scale facility.

w. The docket holder shall prepare and submit an EMP to the Executive Director for review and approval prior to construction of the pilot-scale facility.

x. Unless an extension is requested and approved by the Commission in advance, in accordance with paragraph 11 of the Commission’s Project Review Fee schedule (Resolution No. 2009-2), the docket holder is responsible for timely submittal of a docket renewal application on the appropriate DRBC application form at least 12 months in advance of the docket expiration date set forth below. The docket holder will be subject to late charges in the event of untimely submittal of its renewal application, whether or not DRBC issues a reminder notice in advance of the deadline or the docket holder receives such notice. In the event that a timely and complete application for renewal has been submitted and the DRBC is unable, through no fault of the docket holder, to reissue the docket before the expiration date below (or the later date established by an extension that has been timely requested and approved), the terms and conditions of the current docket will remain fully effective and

enforceable against the docket holder pending the grant or denial of the application for docket approval.

y. The Executive Director may modify or suspend this approval or any condition thereof, or require mitigating measures pending additional review, if in the Executive Director's judgment such modification or suspension is required to protect the water resources of the Basin.

z. Any person who objects to a docket decision by the Commission may request a hearing in accordance with Article 6 of the Rules of Practice and Procedure. In accordance with Section 15.1(p) of the Delaware River Basin Compact, cases and controversies arising under the Compact are reviewable in the United States district courts.

aa. The docket holder may request of the Executive Director in writing the substitution of specific conductance for TDS. The request should include information that supports the effluent specific correlation between TDS and specific conductance. Upon review, the Executive Director may modify the docket to allow the substitution of specific conductance for TDS monitoring.

bb. The docket holder is prohibited from treating/pre-treating any hydraulic fracturing wastewater from sources in or out of the Basin at this time. Should the docket holder wish to treat/pre-treat hydraulic fracturing wastewater in the future, the docket holder will need to first apply to the Commission to renew this docket and be issued a revised docket allowing such treatment and an expanded service area. Failure to obtain this approval prior to treatment/pre-treatment will result in action by the Commission.

BY THE COMMISSION

DATE APPROVED: September 10, 2014

EXPIRATION DATE: September 30, 2019