



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

September 27, 2012

Mr. Pat Clements, City Manager  
City of Lebanon  
50 South Broadway  
Lebanon, Ohio 45036

**RE: City of Lebanon WWTP  
NPDES Permit No. 1PC00003\*GD; OH0021059  
NPDES Compliance Inspection and Notice of Violation**

Dear Mr. Clements:

On September 4, 2012, I conducted a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection at the Lebanon WWTP. The City was represented by John Habig, Superintendent of Water and Wastewater, Terry Hammons, Senior Chief Operator, Randall Atkins, Class III operator, and Kerri May, Lab Technician. The purpose of the inspection was to evaluate several aspects of plant operation and performance, and to assess compliance with the facility's NPDES permit.

Observations and findings of the inspection are detailed in the attached report. The plant appeared to be operating in compliance with the requirements of the NPDES permit. All areas evaluated during the inspection received a satisfactory rating except for "Effluent/Receiving Waters" (refer to Section C of the report). This area was rated marginal primarily due to the ammonia nitrogen violations reported for several months over the last three years. These include monthly average and 7-day violations in July and August, 2010, December, 2011, and August, 2012. A monthly average TSS violation was also reported for September, 2010. Additional information is included in the attached report. As mentioned in John Habig's September 7, 2012 email, the City consulted with Burgess and Niple regarding the August violations and requested their recommendations. Once you receive that information, please submit the final noncompliance report to this office.

The Lebanon WWTP laboratory was inspected and lab procedures were reviewed using Ohio EPA General Lab Criteria. This was the first review of the lab using these criteria. In general, the parameters analyzed by the WWTP lab were being done according to the laboratory criteria.

Requirements in the NPDES permit include collecting samples in the Little Miami River upstream and downstream from the WWTP final outfall. Lebanon WWTP staff expressed concerns over the safety and private property access of the current sampling

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station locations. As a result, we agreed to relocate the upstream sampling location and investigate moving the downstream sampling location. Please keep me informed on this issue.

If you have any questions, don't hesitate to contact me at (937) 285-6102.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael W. Zimmerman", with a long horizontal flourish extending to the right.

Michael W. Zimmerman  
Division of Surface Water

MWZ/tf

Enclosure

cc: John Habig, City of Lebanon



State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PC00003*GD	OH0021059	9/4/2012	C	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Lebanon Regional WWTP 1525 Mason Morrow Millgrove Road Lebanon, OH 45036	9:50 am	8/1/2010
	Exit Time	Permit Expiration Date
	12:45 pm	1/31/2015
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
John Habig, Director of Water and Wastewater Terry Hammons, Senior Chief Operator and Lab Manager Randall Atkins, Class III Operator Joe Harden, Superintendent of Water and Wastewater (not present during inspection)	(513) 228-3601 (513) 494-2386 (WWTP) same same	
Name, Address and Title of Responsible Official	Phone Number	
Pat Clements, City Manager	(513) 2258-3101	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	S	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	M	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	-	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
<p>Review of operating records and electronic Discharge Monitoring Reports as well as observations made during the inspection indicate the treatment plant is generally in compliance with its NPDES permit. However, NH3-N violations were reported for July, August, and September, 2010, December, 2011, and August, 2012. One monthly average TSS was reported for September, 2010. These violations are discussed in Section F of this report. All treatment units were in service other than back-up units.</p>	
Inspector	Reviewer
 Michael W. Zimmerman Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
9-26-12 Date	9/27/12 Date

Sections E thru K: Complete on all inspections as appropriate  
**Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated**

**Section E: Permit Verification**

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee ..... Y
- (b) Flows and loadings conform with NPDES permit..... Y
- (c) Treatment processes are as described in permit application... Y
- (d) All discharges are permitted..... Y
- (e) Number and location of discharge points are as described  
in permit..... Y
- (f) Storm water discharges properly permitted..... Y

Comments/Status:

**Section F: Compliance**

- (a) Any significant violations since the last inspection..... Y
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... Y
- (d) Permittee has a compliance schedule..... N
- (e) Compliance schedule contained in...N/A
- (f) Permittee is in compliance with schedule..... N/A
- (g) Has biomonitoring shown toxicity in discharge since last inspection N

Comments/Status:

***Lebanon indicated the July and August, 2010 NH3-N violations were caused by high ambient temperatures and drought conditions resulting in increased detention times in the collection system, creating higher influent NH3-N concentrations. The September, 2010 TSS violation (30-day average conc.) was the result of floc shearing caused by increased aeration (in an attempt to meet ammonia limits). Ammonia 7-day and 30-day average concentration and loading violations in December, 2011 were caused by heavy rainfall weakening the MLSS and shortening aeration detention times and nitrification, according to Lebanon WWTP operators. During the inspection on September 4<sup>th</sup>, Lebanon reported they were having problems with nitrification. Subsequent eDMR data reported for August revealed a 30-day avg. concentration violation and 7-day conc. and loading violations for NH3-N. By reducing return rates and increasing MCRT, Lebanon was able to lower the NH3-N concentrations.***

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

(a) Standby power available.....generator  or dual feed ..... Y

i. What does the back-up power source operate.....

*All units except the belt filter press and the four digesters.*

ii. How often is the generator tested under load.....

*Full load test every two weeks. Also have an outside contractor conduct an annual maintenance check.*

(b) Which components have an alarm system available for power or equipment failures.....

*SCADA system monitors and controls all components*

(c) All treatment units in service other than backup units..... Y

(d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.)..... Y

(e) Any major equipment breakdown since last inspection..... N

(f) Operation and maintenance manual provided and maintained..... Y

(g) Any plant bypasses since last inspection..... N

(h) Any plant upsets since last inspection..... Y

Comments/Status:

*A new influent bar screen was installed in Feb., 2011*

*Two of the four Schreiber aeration/clarification units were on line.*

*There was a moderate ashing problem in the clarifiers – patches of pin floc were observed. Significant amount of filamentous algae was observed in the clarifier weirs and effluent trough.*

*Operators utilize weekly preventative maintenance printouts for routine activities; these also include the pump stations*

*Influent BOD and TSS have trended upward, from approx. 180 to approx. 250 mg/l since Mane, Inc., a food flavoring business, relocated there.*

Section G: Operation & Maintenance con't

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7)...*III*..... Y
- (b) Operator of Record holds unexpired license of class required by Permit..... Y
- (c) Copy of certificate of Operator of Record displayed on-site..... N
- (d) Has the Operator of Record submitted an ORC Notification form.. Y
- (e) Minimum operator staffing requirements fulfilled (OAC 3745-7.... Y
- (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... Y
- (g) Operator of Record log book provided..... Y
- (h) Format of log book (e.g. computer log, hard bound book)  

<i>Hard bound book</i>
------------------------
- (i) Log book kept onsite (in an area protected from weather)..... Y
- (j) Log book contains the following:
  - I. Identification of treatment works..... Y
  - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
  - iii. Daily record of operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... Y
  - iv. Laboratory results (unless documented on bench sheets)... Y
  - v. Identification of person making entries..... Y
- (k) Has the Operator of Record submitted written notifications to the permittee, Ohio EPA and, if applicable, any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

Comments/Status:

*MLSS target usually around 2500 mg/l; increased to 2700 to 2800 a few days prior to the inspection. They were in the process of wasting sludge.*

*Minimum ORC on-site time requirement – 20 hours (reduced staffing hours approved in 2010)*

**Section G: Operation & Maintenance con't**

**Collection System:**

- (a) Are there pump stations in the collection system..... Y
  - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent.....6
  - ii. How many pump stations have telemetered alarms.....6
  - iii. How many pump stations have operable alarms.....6
- (b) Any chronic collection system overflows since last inspection..... Y
- (c) Regulatory agency notified of all overflows..... Y
- (d) CSOs in the collection system....if so, what is the LCTP status..... N
 

Seven pump stations  
 Standby power for pump stations consists of a portable generator and two diesel pumps
- (e) How are CSOs monitored (chalk, block, level sensor, etc.)..... N/A
- (f) Portable pumps available for collection system maintenance..... Y
- (g) RDII Program established and active..... Y
- (h) Any WIB complaint received since last inspection..... N
- (i) Is there a WIB response plan..... Y
- (j) Is any portion of the collection system at or near dry weather Capacity..... N

**Comments/Status:**

*As part of the preventative maintenance program, operators check pump stations every week.*

*Collection system overflows – three so far this year*

*Norgal pump station – very small; only operates about one to two hours a week*

*Lebanon's WIB standard operating practice includes response with their Jet Vac truck and cleaning the sewer lines*

**Section H: Sludge Management**

(a) Method of Sludge Disposal...

- Land Application
- Haul to Another NPDES Permittee
- Haul to a Mixed Solid Waste Landfill

\*if one of the selected methods is land application, complete applicable charts.

**Class A - Exception Quality Sewage Sludge (monitoring station 584)**

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options							
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 – Aerobic Bench Scale Analysis	Option 4 – Specific Oxygen Uptake Rate	Option 5 – Aerobic Time and Temperature	Option 6 – Alkali Addition	Option 7 – >75% Percent Solids without Unstabilized Solids	Option 8 - >75% Percent Solids with Unstabilized Solids
Alternative 1 – Time and Temperature Regime (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – High pH and High Temperature (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 – Other Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 4 – Unknown Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Composting (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Heat Drying (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Heat Treatment (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Thermophilic Aerobic Digestion (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Beta Ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Gamma ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Pasteurization (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 6 - Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Class B Sewage Sludge (monitoring station 581)**

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options									
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 - Aerobic Bench Scale Analysis	Option 4 - Specific Oxygen Uptake Rate	Option 5 - Aerobic Time and Temperature	Option 6 - Alkali Addition	Option 7 - >75% Percent Solids without Unstabilized	Option 8 - >75% Percent Solids with Unstabilized	Option 9 - Land Injection	Option 10 - Immediate Incorporation
Alternative 1 - Geometric Mean of Seven Fecal Samples (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Aerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Air Drying (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Anaerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Composting (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Lime Treatment (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 - Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (b) Has amount of sludge generated changed significantly since the last inspection..... N
- (c) How much sludge storage is provided at the plant.....  

8 sludge digester tanks (approx.. 400,000 gals total)
- (d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... Y
- (e) Any complaints received in last year regarding sludge..... N
- (f) 5/8" screen at headworks for facilities that land apply sludge..... N/A
- (g) Are sludge application sites inspected to verify compliance with NPDES permit..... N/A

**Comments/Status:**

*The dewatering belt filter press operates typically 3 days a week.  
 Dewatered sludge is hauled to the Rumpke landfill on Colerain Ave. in Hamilton Co.*

**Section I: Self-Monitoring Program**

**Flow Measurement:**

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):  

<i>Ultrasonic level sensor with V-notch weir</i>
--
- (b) Flow meter calibrated annually ..... Y  
(Date of last calibration: *August, 2012* )
- (c) 24-hour recording instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) All discharged flow is measured..... Y

**Comments/Status:**

<i>Final effluent flow at 12:45 pm – 722 gpm</i>
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**Section I: Self-Monitoring Program (con't)**

**Sampling:**

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y  
(see GLC page)
- (d) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y

**Comments/Status:**

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Section I: Self-Monitoring Program (con't)

Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... Y
- (b) Do SOP's include the following if applicable:
  - Title
  - Scope and Application
  - Summary
  - Sample Handling and Preservation
  - Interferences
  - Apparatus and Materials
  - Reagents
  - Procedure
  - Calculations
  - Quality Control
  - Maintenance
  - Corrective Action
  - Reference (Parent Method)

*Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. "Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.*

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... N/A
- (e) Analyses being performed more frequently than required by permit. N
- (f) If (e) is yes, are results in permittee's self-monitoring report..... N/A
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y (see score from GLC page)
- (h) Commercial laboratory used..... Y  
Parameters analyzed by commercial lab: **all parameters except temp., pH, D.O., and TSS, which are done at the WWTP lab**  
Lab name: **Belmont Labs**

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... Y  
Date: 2012; DMRQA #32
- (b) Were any parameters "Unsatisfactory"..... N
- (c) Reasons for "Unsatisfactory" parameters... **NA**.....

NA

Comments/Status:

All parameters were Satisfactory

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**Section J: Effluent/Receiving Water Observations**

Outfall # **001**

Outfall Description: *Final effluent discharge to Little Miami River (right bank; pipe submerged)*

Receiving Stream: *Little Miami River*

Receiving Stream Description:

**Comments/Status:**

*WWTP operators have been having problems with their automatic sampler – ISCO 4700*

*The final effluent was relatively clear with a slight amount of foam*

*Due to property access and safety concerns, Lebanon has requested changing the location of the upstream (801) and downstream (901) sampling stations. The upstream sampling location will be relocated from the current SR 48 bridge upstream to the Main Street bridge in South Lebanon. Lebanon is considering moving the downstream location to the bike path spur just downstream of the final outfall.*

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**Section K: Multimedia Observations**

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

**Comments/Status:**

Permit #: 1PC00003\*GD  
 NPDES #: OH0021059

**Final Effluent Limitation Violations**  
 (September, 2009 thru August, 2012)

<u>Reporting Period</u>	<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
July 2010	Nitrogen, Ammonia (NH3)	7D Conc	1.0	1.74333	7/1/2010
August 2010	Nitrogen, Ammonia (NH3)	30D Conc	0.67	.90565	8/1/2010
August 2010	Nitrogen, Ammonia (NH3)	7D Conc	1.0	2.13833	8/8/2010
September 2010	Total Suspended Solids	30D Conc	10	13.	9/1/2010
December 2011	Nitrogen, Ammonia (NH3)	30D Conc	1.4	4.81833	12/1/2011
December 2011	Nitrogen, Ammonia (NH3)	7D Conc	2.1	3.54	12/1/2011
December 2011	Nitrogen, Ammonia (NH3)	30D Qty	32	73.0359	12/1/2011
December 2011	Nitrogen, Ammonia (NH3)	7D Qty	49	104.070	12/1/2011
December 2011	Nitrogen, Ammonia (NH3)	7D Conc	2.1	10.9333	12/8/2011
December 2011	Nitrogen, Ammonia (NH3)	7D Qty	49	126.711	12/8/2011
December 2011	Nitrogen, Ammonia (NH3)	7D Conc	2.1	4.8	12/15/2011
December 2011	Nitrogen, Ammonia (NH3)	7D Qty	49	61.3609	12/15/2011
August 2012	Nitrogen, Ammonia (NH3)	30D Conc	0.67	1.17079	8/1/2012
August 2012	Nitrogen, Ammonia (NH3)	7D Conc	1.0	4.91433	8/22/2012
August 2012	Nitrogen, Ammonia (NH3)	7D Qty	23	36.9824	8/22/2012