DATA TRACKING AND TECHNICAL FACT SHEET

WPED PRETREATMENT PERMIT ISSUANCE

APPLICANT	NTE Connecticut, LLC
PERMIT NO.	SP0002475
APPLICATION NO.	201615592
DATE APPLICATION RECEIVED	December 19, 2016
LOCATION ADDRESS	Killingly Energy Center 189 Lake Road, Killingly, Connecticut 06241
FACILITY CONTACT	Tim Eves Office Phone: 813-503-2991 Email: teves@nteenergy.com
MAILING ADDRESS	Tim Eves 24 Cathedral Place, Suite 300 Saint Augustine, Florida 32084
DMR CONTACT	Tim Eves Office Phone: : 813-503-2991 Email: teves@nteenergy.com
PERMIT TERM	5 Years
PERMIT CATEGORY	PRETREATMENT SIGNIFICANT INDUSTRIAL USER (SIU) PRETREATMENT CATEGORICAL INDUSTRIAL USER (CIU) Steam Electric Power Generating 40 CFR 423.17(b)
SIC CODE(S)	4911
PERMIT TYPE	Issuance
OWNERSHIP	Private
PUBLICLY OWNED TREATMENT WORKS ("POTW") THAT RECEIVES THE DISCHARGE	Killingly POTW via its collection system. The POTW discharges to the Quinebaug River under Permit No. CT0101257
DEEP STAFF ENGINEER	Stephen Edwards
TENTATIVE DECISION FACT SHEET DATE	February 13, 2020, revised April 23, 2020

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SOLVENT MANAGEMENT PLAN

Is the facility operating under an approved solvent management plan (SMP)? ☐ Yes ☐ No ☒ N/A

If yes, indicate date issued:

No Solvent Management Plan shall be more than 5 years old.

PERMIT FEES

Application Fee:

Filing Fee	Cost: $1,300	Date Paid: December 19, 2016
Processing Fee	Cost: $13,650	Date Paid: February 2, 2017

Annual Fee:

DISCHARGE CODE	WASTEWATER CATEGORY (per 22a-430-7)	MAXIMUM Gallons Per Day ("GPD") or CATEGORY	DSN	ANNUAL FEE (per 22a-430-7)
501060z	Steam electric power plant	90,000 (1 unit)	201-1	$8,425
TOTAL		90,000 (1 unit)		$8,425

I. APPLICANT

NTE Connecticut, LLC (NTE) proposes to construct and operate the Killingly Energy Center (KEC), a 650-MW combined cycle dual fuel combustion turbine electric generating facility. Wastewater from on-site steam power-generating activities will be treated and discharged via one sewer connection point, DSN 201-1, to the Killingly publicly owned treatment works (POTW).

The proposed facility will consist of a (1) Mitsubishi M501JAC combustion turbine generator (CTG), a (1) heat recovery steam generator (HRSG) and a (1) steam turbine generator. An air cooled condenser will be used to condense the exhaust steam from the steam turbines prior to reuse in the HRSG.

On December 19, 2016 the Department of Energy and Environmental Protection (DEEP) received an application (Application No. 201615592) from NTE seeking a permit (Permit No. SP0002475) to authorize the proposed discharge of wastewater associated with steam electric power generation to the Killingly POTW. Application No. 201615592 was public noticed in the Norwich Bulletin on December 10, 2016. On March 7, 2017, the application was determined to be administratively sufficient.

The Siting Council issued its final Opinion Letter in addition to its final Decision Letter on June 6, 2019, Docket No. 470B.

II. NATURE OF THE BUSINESS GENERATING THE DISCHARGE

The applicant seeks authorization for the following:

DSN	PROPOSED MAXIMUM DAILY FLOW (gpd)	PROPOSED WASTESTREAMS	TREATMENT TYPE	DISCHARGE TO
201-1	90,000	Low Volume Waste streams consisting of inlet air evaporative cooling wastewater, demineralized water treatment wastewater, temporary demineralized water treatment trailer wastewater, floor drains (including equipment wash waters), and HRSG blowdown	Floor drain and equipment wash wastewaters treated via o/w separation	Killingly POTW

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WASTESTREAMS	DESCRIPTION
Inlet Air Evaporative Cooling Wastewater	During high ambient temperatures and low relative humidity conditions, potable water may be sprayed into the turbine inlet air to improve power output and efficiency. The evaporative cooling system cools the intake air through humidification, raising relative humidity and lowering the inlet air temperature. Cooling the inlet air increases the air mass flow rate and turbine functionality, resulting in higher turbine output power and efficiency. Up to 21,000 gpd of potable water is used, nothing is added to the water, and it only contacts filtered air and the inside of the cooler. The majority of the water, about two thirds, is evaporated during the humidification process. The remaining one third is discharged as part of DSN 201-1.
Demineralized Water Treatment Wastewater	Water treatment wastewater generated from the operations associated with treating the incoming water (ion exchange regeneration and reverse osmosis backwash)
Temporary Demineralized Water Treatment Trailer	Portable demineralizer to be used when burning ultra-low sulfur diesel (ULSD)as the primary fuel
Floor Drains	Drains from miscellaneous equipment enclosures, the fuel gas compressor enclosure, control/electrical building, turbine hall, and the admin warehouse/maintenance buildings
HRSG Blowdown	Blowdown from the HRSG steam cycle in order to prevent excess mineral build-up. Demineralized water is used in the HRSG with aqueous ammonia added as an anti-corrosive.
Equipment Washwater	Wastewater generated from cleaning equipment within buildings (e.g., pumps, fans, heat exchangers) at the site to remove dirt or dust and routed to floor drains; no cleaning chemicals or degreasers are used in the process, exclusive of turbine washwater.

III. BACKGROUND/PERMIT HISTORY

Compliance/Enforcement

Effluent Violations: NA (new discharge)

For the past 5 years provide a violations history for each DSN and list all WPED enforcement actions and their status.

Is the Permittee subject to an ongoing enforcement action? ☐ Yes ☑ No

If yes, provide a brief explanation; include discussions of any issues relevant to the activities regulated under the permit.

Does the Permit contain a compliance schedule? ☑ Yes ☐ No

If yes, please check all that apply.

☐ Pollution Prevention ☐ Water Conservation ☐ Remediation

☐ Water Quality Requirement ☐ Treatment Requirement ☑ Other

The permit contains an enforceable compliance schedule which requires NTE to notify the Commissioner when commercial operations commence, submit an updated operation and maintenance plan for the wastewater treatment system once built, and submit a detailed analytical analysis of the discharge once commercial operations begin.

Modifications

Within the last five years, have there been any permit modifications? ☐ Yes ☑ No

IV. THE ON-SITE WASTEWATER TREATMENT SYSTEM

201-1 - Wastewater from the plant floor drains is to be passed through a 350 gpm oil/water separator to remove oil and grit prior to discharging to the operational sump that discharges via DSN 201-1. (see attached Water Collection diagram)

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V. EFFLUENT GUIDELINES

In Connecticut, all discharges must comply, at a minimum, with the general prohibitions of the federal pretreatment standards and section 22a-430-4(t) of the Regulations of Connecticut State Agencies. State-issued pretreatment permits utilize federal categorical and state regulatory standards and effluent limitations to assure such compliance is achieved. In cases where there exists a risk for a pollutant to have a negative impact on receiving waters and/or the POTW's operations, including sludge handling or disposal, worker health or safety, or ability to comply with its own NPDES permit, state permits may incorporate local limits.

Killingly Energy Center's primary business is the generation of electricity for distribution and sale utilizing fossil fuels. Operations at the facility are expected to begin in 2021. Accordingly, process wastewaters from the facility are subject to 40 CFR 423.17(b) (Steam Electric Power Generating Point Source Category, Pretreatment standards for new sources (PSNS) after June 7, 2013) as low volume waste (40 CFR 423.11(b). Specifically the limits and conditions contained in 40 CFR 423.17(b)(1) (polychlorinated biphenyl compounds ("PCBs").

Chemical metal cleaning wastes regulated under 40 CFR 423.17(b)(2), will be shipped off site.

The facility will be air cooled. Therefore, 40 CFR 423.17(a)(4)(i) (cooling tower blowdown) is not applicable.

40 CFR 423.17(b)(5) through (10) were also assessed and found not applicable to DSN 201-1. These standards apply to coal burning facilities and NTE will use natural gas and oil.

VI. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

BASIS FOR LIMITS, STANDARDS OR CONDITIONS		REGULATION	DISCHARGE POINT(S)
☐	Federal Effluent Limitation Guideline ("ELG")		
☐	Pretreatment Standards for Existing Sources ("PSES")		
☒	Pretreatment Standards for New Sources ("PSNS")	40 CFR 423.17(b)	201-1
☐	Performance Standards		
☐	Section 22a-430-4(s) of the Regulations of Connecticut State Agencies ("RCSA")		
☒	Case-by-Case Determination using Best Professional Judgment ("BPJ")	Section 22a-430-4(m) RCSA and Section 22a-430-4(l)(4)(D)(iii) RCSA	201-1
☒	Killingly Code of Ordinances (local limits)	Section 15-47	201-1

A. MONITORING PARAMETERS & LIMITS:

DSN 201-1

PARAMETER	40 CFR 423.17(b)		RCSA section 22a-430-4(s)(2)			Local Limits			BPJ		
	Average Monthly (mg/l)	Maximum Daily (mg/l)	Average Monthly (mg/l)	Maximum Daily (mg/l)	Instantaneous (mg/l)	Average Monthly (mg/l)	Maximum Daily (mg/l)	Instantaneous (mg/l)	Average Monthly (mg/l)	Maximum Daily (mg/l)	Instantaneous (mg/l)
Ammonia, Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	----	NA
Copper, Total	NA	NA	NA	NA	NA	NA	NA	1.0	1.0	2.0	3.0
Nickel, Total	NA	NA	NA	NA	NA	NA	NA	1.0	1.0	2.0	3.0
Oil Petroleum, Total Recoverable	NA	NA	NA	NA	NA	NA	NA	100.0	NA	NA	----
pH min	NA	NA	NA	NA	NA	NA	NA	6.0	NA	NA	6.0
pH max	NA	NA	NA	NA	NA	NA	NA	10.0	NA	NA	10.0
Phosphorus, Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	----	NA
Solids, Total Suspended	NA	NA	NA	NA	NA	NA	NA	NA	NA	----	NA
Temperature, Maximum	NA	NA	NA	NA	NA	NA	NA	150	NA	NA	----
Zinc, Total	NA	NA	NA	NA	NA	NA	NA	1.0	1.0	2.0	3.0

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B. COMMENTS ON SPECIFIC PARAMETERS:

DSN 201-1

Ammonia
Aqueous ammonia will be stored and used at the plant to help control the pH in the HRSG. As stated in its application, NTE predicts an ammonia concentration of 1.7 mg/l in its discharge. Based on this and data from other similar steam electric discharges, staff determined that DSN 201-1 should be monitored for ammonia.

Copper
Copper will be removed from the incoming potable water by the facility's potable water treatment system and concentrated in its regen wastewater. As stated in its application, NTE predicts a copper concentration of 0.069 mg/l in its discharge. Based on this and data from other similar steam electric discharges, staff determined that DSN 201-1 should be monitored for copper. Regulatory and BPJ limits were compared. Local instantaneous limits were found to be the most restrictive (see above table). The local instantaneous limit was used as the maximum daily limit.

Lead
NTE predicts the concentration of lead in its discharge will be 0.0019 mg/l. The source of lead is the potable water supply. Trace amounts of lead in the incoming water will be concentrated in NTE's on site demineralization system when it generates deionized water.

Staff reviewed six years of data (January 2011 to November 2016) of the concentration of lead in the discharge from Lake Road Generating Company (Permit no. SP0002356), a steam electric facility just down the street from the proposed NTE steam electric facility that uses the same technology and water source. The median concentration of lead in Lake Road's discharge was 0.00085 mg/l, with a maximum concentration of 0.0056 mg/l.

Applicable regulatory state, federal, and local lead limits were compared. Killingly's local instantaneous limit of 0.1 mg/l was found to be the most restrictive.

Given the estimated low concentration of lead in the proposed discharge relative to applicable limits and the data form Lake Road, staff determined that lead is not a priority pollutant in the proposed discharge. That the discharge does not need to be monitored for lead.

Nickel
As stated in its application, NTE predicts the discharge will not contain a measurable concentration of nickel. However, sampling data from an existing steam electric facility in Killingly with a similar water source does have nickel in its discharge. Therefore staff determined that DSN 201-1 should be monitored for nickel. Once at least two years of data exist for the discharge, the need to monitor for nickel and monitoring frequency may be reexamined. Regulatory and BPJ limits were compared. Local instantaneous limits were found to be the most restrictive (see above table). The local instantaneous limit was used as the maximum daily limit.

Oil Petroleum, Total Recoverable
Fuel oil will be stored and used at the plant. As stated in its application, NTE predicts a total oil and grease concentration of less than 15 mg/l in its discharge. Based on this and data from other similar steam electric discharges, staff determined that DSN 201-1 should be monitored for total recoverable oil petroleum. Regulatory and BPJ limits were compared. Local instantaneous limits were found to be the most restrictive (see above table). The local instantaneous limit was used as the maximum daily limit.

pH
The pH limits are 6.0 S.U. (minimum) and 10.0 S.U. (maximum). These limits are considered to be protective of sanitary sewer systems, and are consistent with the Killingly POTW's local limits.

Phosphorus
NTE uses trisodium phosphate to help control the pH in the HRSG. NTE predicts the discharge will contain 4.5 mg/l of phosphorus. The Killingly POTW's permit contains seasonal phosphorus limits.

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Therefore staff determined that DSN 201-1 should be monitored for phosphorus to establish its baseline concentration in the discharge.

Total suspended solids (TSS)
As stated in its application, NTE predicts that the TSS concentration in DSN 201-1 will be 13.9 mg/l. Staff determined the discharge should be monitored for TSS. Regulatory and BPJ limits were compared. Local instantaneous limits were found to be the most restrictive (see above table). The local instantaneous limit was used as the maximum daily limit.

Temperature
As stated in its application, NTE predicts the median temperature of DSN 201-1 will be less than 150 degrees F. The permit contains a limit for temperature of 150 degrees F for consistency with local limits.

Zinc
Like copper, zinc will be removed from incoming potable water by the facility's potable water treatment system. Therefore, zinc has the potential to be concentrated in the water treatment wastewater. As stated in its application, NTE predicts a zinc concentration of 0.0846 mg/l in its discharge. Based on this and data from other similar steam electric discharges, staff determined that DSN 201-1 should be monitored for zinc. Regulatory and BPJ limits were compared. Local instantaneous limits were found to be the most restrictive (see above table). The local instantaneous limit was used as the maximum daily limit.

Monitoring Frequency
In accordance with Section 22a-430-3 of the RCSA, the permit requires weekly monitoring for all parameters, except flow, pH and temperature. Flow, pH and temperature will be monitored continuously.

VII. PERMITS FOR OTHER DISCHARGES

The Department approved NTE's Stormwater and Dewatering Wastewaters from Construction Activities general permit registration on January 7, 2020.

NTE is also required to register under the Stormwater Associated with Industrial Activities general permit prior to starting operations.

Discharges of air conditioner and compressor condensate to the sanitary sewer system will be authorized by General Permit for Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater.

VIII. COMMENTS RELATED TO THE PUBLIC NOTICE

Stephen Edwards was assigned this application on January 20, 2017.

The draft permit and its accompanying fact sheet were emailed to David Capacchione of the Town of Killingly Water Pollution Control Facility on July 16, 2019. The Town did not provide comments on the drafts.

The Commissioner originally published notice of the tentative decision in the Norwich Bulletin and on the Department of Energy and Environmental Protection ("Department") website on March 5, 2020. During this time the Department's website migrated to a new platform. However, a delay occurred in the migration of the corresponding "eAlert" system that provides the public electronic notification of notices posted on the Department's website. The delay did not come to the attention of the Department until after the close of the thirty (30) day comment period for the original public notice. For this reason, the Commissioner reissued the notice of tentative decision and is providing an additional thirty (30) day comment period.

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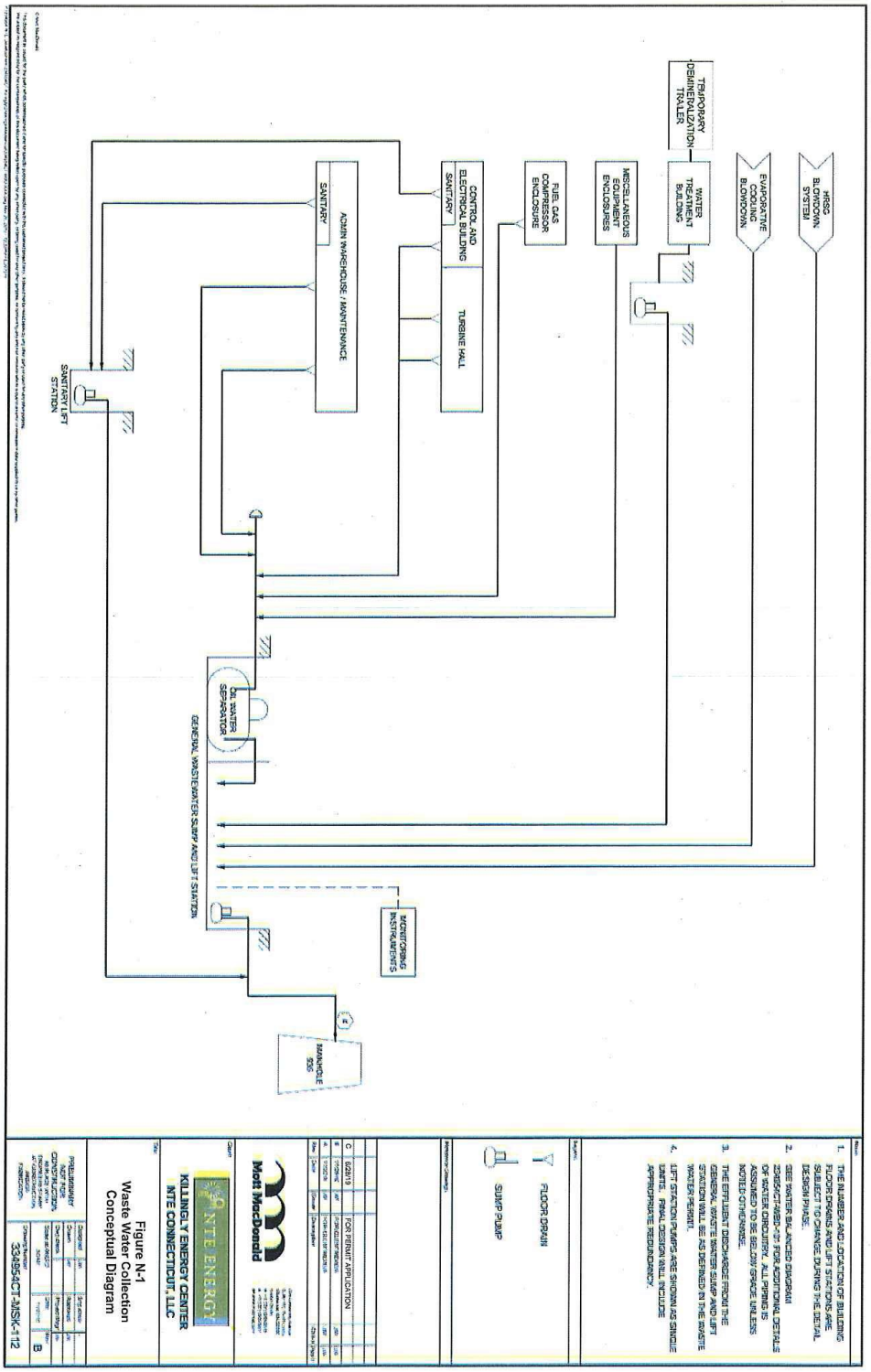
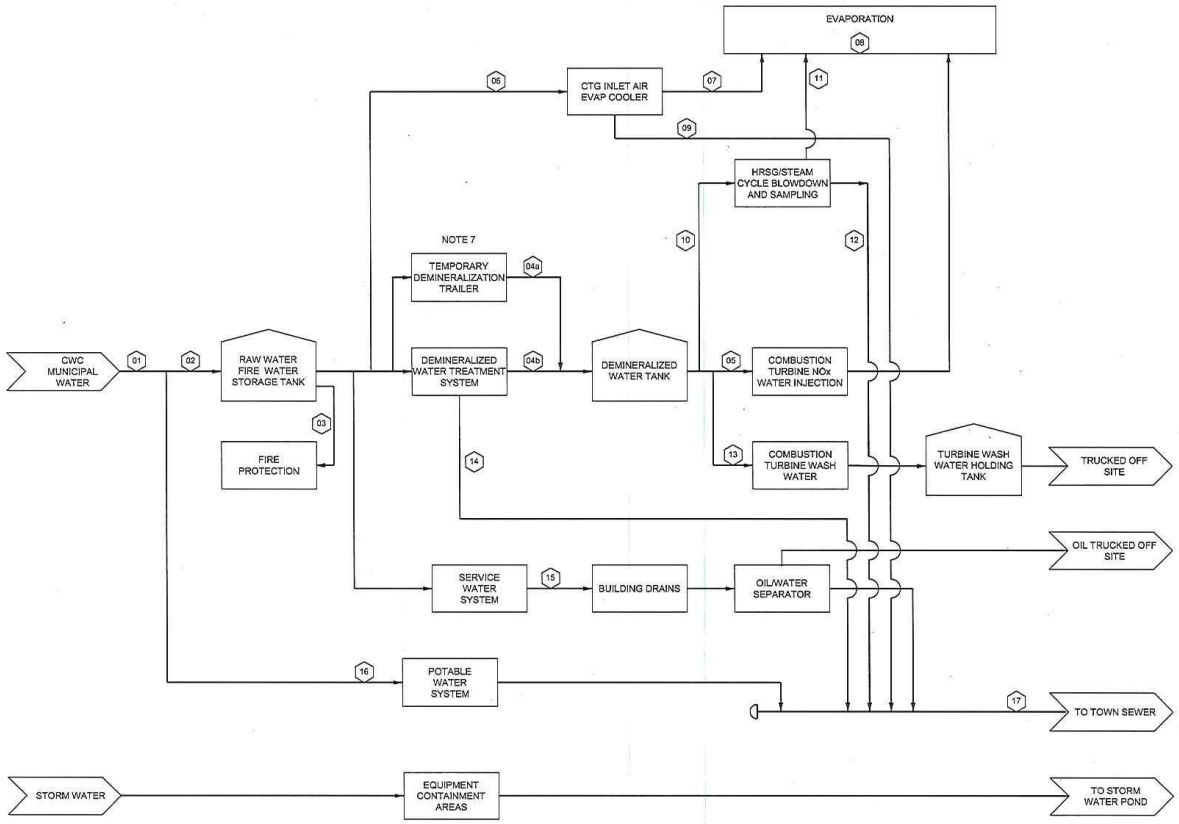

HRSG BLOWDOWN SYSTEM
EVAPORATIVE COOLING TOWER BLOWDOWN
TEMPORARY DEMINERALIZATION TRAILER
WATER TREATMENT BUILDING
MISCELLANEOUS EQUIPMENT ENCLOSURES
FUEL GAS COMPRESSOR ENCLOSURE
CONTROL AND ELECTRICAL BUILDING
SANITARY
TURBINE HALL
ADMIN WAREHOUSE / MAINTENANCE
SANITARY
SANITARY LIFT STATION
OIL WATER SEPARATOR
GENERAL WASTEWATER SUMP AND LIFT STATION
MONITORING INSTRUMENTS
MANHOLE SG
Notes:
1. THE NUMBER AND LOCATION OF BUILDING FLOOR DRAINS AND LIFT STATIONS ARE SUBJECT TO CHANGE DURING THE DETAIL DESIGN PHASE.
2. SEE WATER BALANCED DIAGRAM 2085ACT-M50-101 FOR ADDITIONAL DETAILS OF WATER CIRCUITRY. ALL PIPING IS ASSUMED TO BE BELOW GRADE UNLESS NOTED OTHERWISE.
3. THE EFFLUENT DISCHARGE FROM THE GENERAL WASTE WATER SUMP AND LIFT STATION WILL BE AS DEFINED IN THE INPDES WATER PERMIT.
4. LIFT STATION PUMPS ARE SHOWN AS SINGLE UNITS. FINAL DESIGN WILL INCLUDE APPROPRIATE REDUNDANCY.
Legend:
FLOOR DRAIN
SUMP PUMP
Revisions/Comments:
C 8/28/19 FOR PERMIT APPLICATION
Mott MacDonald
Client:
NTE ENERGY
KILLINGLY ENERGY CENTER
NTE CONNECTICUT, LLC
Title:
Figure N-1
Waste Water Collection
Conceptual Diagram
PRELIMINARY
CONSTRUCTION
334954CT-MSK-112



Notes

1. CASE 1 ASSUMES OPERATION AT WINTER AMBIENT CONDITIONS, 100% CT LOAD ON GAS, DUCT BURNER OFF, EVAP COOLER OFF.
2. CASE 2 ASSUMES OPERATION AT ANNUAL AVERAGE AMBIENT CONDITIONS, 100% CT LOAD ON GAS, DUCT BURNER OFF, EVAP COOLER OFF.
3. CASE 3 ASSUMES OPERATION AT SUMMER AMBIENT CONDITIONS, 100% CT LOAD ON GAS, DUCT BURNER ON 12 HRS/DAY, EVAP COOLER ON 12 HRS/DAY.
4. CASE 4 ASSUMES OPERATION AT WINTER AMBIENT CONDITIONS, 100% CT LOAD ON ULSD, DUCT BURNER OFF, EVAP COOLER OFF.
5. CASE 5 ASSUMES OPERATION AT SUMMER AMBIENT CONDITIONS, 100% CT LOAD ON ULSD, DUCT BURNER OFF, EVAP COOLER ON 12 HR/DAY.
6. PROCESS IS SHOWN FOR DIAGRAMMATIC PURPOSES BUT CONSUMPTION IS NEGLIGIBLE.
7. TEMPORARY DEMINERALIZATION TRAILERS WILL BE USED TO PROVIDE ALL DEMIN WATER REQUIRED FOR CTG NOx WATER INJECTION WHILE FIRING USLD

Legend

Reference Drawings

Rev	Date	Drawn	Description	Ch'k'd	App'd
E	03/21/19	AF	FOR CLIENT REVIEW	KP	JW
D	03/15/19	AF	FOR CLIENT REVIEW	KP	JW
C	03/14/19	AF	MITSUBISHI BASIS	KP	JW
B	12/13/17	JF	REMOVED FILTERED WATER SYSTEM	KP	JW
A	12/05/17	AF	FOR CLIENT REVIEW	JW	JW

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Client

Killingly Energy Center
an NTE Energy Project

Title

FIGURE M-1
KEC WATER BALANCE

PRELIMINARY NOT FOR CONSTRUCTION REPLACE WITH ENGINEERS STAMP AT CONSTRUCTION AND/OR FABRICATION

Designed	JW	Eng check	-
Drawn	AF	Approved	JW
Dwg check	-	Project Mngr	JW
Scale at ANSI D SCALE		Date 03/05/18	Rev E

Drawing Number 334954CT-WBD-201 01

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SUMMARY FLOW TABLE (kgpd)						
NODE #	DESCRIPTION	CASE1[1]	CASE2[2]	CASE3[3]	CASE4[4]	CASE5[5]
1	Municipal Water Supply (Total)	41.7	40.0	70.0	327.6	345.4
2	Raw Water to Storage Tank	38.9	37.2	67.1	324.7	342.5
3	Fire Protection	Note 6	Note 6	Note 6	Note 6	Note 6
4	Demineralized Water Treatment Product	29.2	27.8	34.7	260.7	257.8
5	CTG Water Injection	0.0	0.0	0.0	231.5	231.5
6	Make-up to CTG Inlet Air Coolers	0.0	0.0	21.4	0.0	21.4
7	CTG Inlet Air Cooler Evaporation	0.0	0.0	14.3	0.0	14.3
8	Total Evaporation	11.6	11.0	28.1	243.1	256.2
9	CTG Inlet Air Cooler Blowdown	0.0	0.0	7.1	0.0	7.1
10	Make-up to Steam Cycle	29.2	27.8	34.7	29.2	26.2
11	Steam Cycle Vent	11.6	11.0	13.8	11.6	10.4
12	Steam Cycle Blowdown	17.6	16.7	20.9	17.6	15.8
13	Combustion Turbine Wash Water	Note 6	Note 6	Note 6	Note 6	Note 6
14	Demineralized Water Treatment Waste	6.8	6.5	8.1	61.2	60.5
15	Equipment Washdown	2.9	2.9	2.9	2.9	2.9
16	Potable Water Supply	2.9	2.9	2.9	2.9	2.9
17	Discharge to Town Sewer (Total)	30.2	29.0	41.9	84.5	89.2

Notes

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3. CASE 3 ASSUMES OPERATION AT SUMMER AMBIENT CONDITIONS, 100% CT LOAD ON GAS, DUCT BURNER ON 12 HRS/DAY, EVAP COOLER ON 12 HRS/DAY.
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5. CASE 5 ASSUMES OPERATION AT SUMMER AMBIENT CONDITIONS, 100% CT LOAD ON ULSD, DUCT BURNER OFF, EVAP COOLER ON 12 HR/DAY.
6. PROCESS IS SHOWN FOR DIAGRAMMATIC PURPOSES BUT CONSUMPTION IS NEGLIGIBLE.

Legend

Reference Drawings

Rev	Date	Drawn	Description	Ch'k'd	App'd
B	08/15/16	AF	FOR CLIENT REVIEW	JW	JW
A	08/15/16	AF	FOR CLIENT REVIEW	JW	JW

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Figure M-2

KEC Water Balance (cont.)

Killingly Energy Center
an NTE Energy Project

PRELIMINARY NOT FOR CONSTRUCTION
REPLACE WITH ENGINEERS STAMP AT CONSTRUCTION AND/OR FABRICATION

Designed	-	Eng check	-
Drawn	-	Approved	-
Dwg check	-	Project Mngr	-
Scale at ANSI D SCALE		Date 08/05/16	Rev B

Drawing Number 334954CT-WBD-101 02

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P:\334954 NTE Development\334954CT Killingly\Drawings\Mechanical\334954CT-WBD-101.dwg Aug 15, 2016 - 5:43PM FEDT7376