



December 8, 2003

Oneida County Department of Water
Quality & Water Pollution Control
51 Leland Avenue
P.O. Box 442
Utica, New York 13503-0442

Attention: Mr. Dan Hoffman, Industrial Wastes Chemist

RE: Groundwater Permit No. GW-040
Semi-Annual Report: May 31, 2003 to November 30, 2003
Primoshield Plating, Inc., Site #6-33-027
Oneida County Sewer District

Dear Mr. Hoffman:

Enclosed please find the Semi-Annual Report, due November 30, 2003, for the above Groundwater Permit from Primoshield Plating, Site #633027, City of Utica. The report contains the Oneida County Sewer District Reporting Form and the Oneida County District Industrial Use Report Certifications.

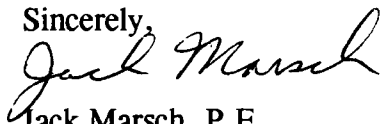
Please note that all analytical values on the reporting form are expressed in mg/liter and the raw analytical data is expressed in micrograms/liter.

All analysis was performed by Severn Trent Laboratories, Buffalo, New York. All analyses for this permit are analyses specified in 40 CFR 136.

Per standard practice, only values above detection limits are summed for Total VOC's by EPA Method 624. No parameter analyzed was near any toxic hazardous waste level. U abbreviates non-detectable.

If you have any questions, I can be reached at (315) 793-2554.

Sincerely,



Jack Marsch, P.E.
Environmental Engineer 2
Region 6 - Utica

cc: Darrell Sweredoski
Sue Lasdin

ONEIDA COUNTY SEWER DISTRICT REPORTING FORM

Submit To:
ATTN: PRETREATMENT
ONEIDA COUNTY SEWER DISTRICT
PO BOX 442
UTICA NY 13503

From
JACK MARSCH
NYSDEC REGION 6
207 GENESEE STREET
UTICA NY 13501

Site
PRIMOSHIELD SITE
1212 ST. VINCENT STREET
UTICA NY 13501

REPORTING PERIOD: MAY 31, 2003 to NOVEMBER 30, 2003

SAMPLING RESULTS:

For Semi-Annual Reporting, a grab sample of the Primoshield Site discharge to the sanitary sewer is analyzed for the pollutants listed. Attach signed Report Certification.

In response to any violations incurred, self-monitor for pollutant in violation at least once a week until there are results for three consecutive sampling events which are in full compliance with Permit Limits. Submit all results for all samples taken. The first resampling result is due within thirty (30) days; a complete report with all three resampling results is due within sixty (60) days. Attach signed Report Certification.

ATTACH COPIES OF ALL CONTRACT LABORATORY REPORTS AND MANIFESTS OF HAZARDOUS WASTE SHIPMENTS FOR THE REPORTING PERIOD.

POLLUTANT PARAMETER	DAILY MAXIMUM LIMIT	ANALYSIS SAMPLE #1	ANALYSIS SAMPLE #2	ANALYSIS SAMPLE #3
Date Sampled		9/30/03		
Sample Number		916601		
Discharge Flow (Note 1)		*		
pH	5.0-12.5	7.24		
Cadmium, mg/L	1.0	0.000304		
Chromium, mg/L	5.0	0.000904		
Copper, mg/L	3.0	0.0042 B		
Lead, mg/L	5.0	0.0016 U		
Nickel, mg/L	2.0	0.120		
Zinc, mg/L	4.0	0.0042 B		
Cyanide, mg/L	3.0	0.010 U		
Total VOCs (Note 2)	2.0	0.050		

1) Attach monthly flow totalizer data.

* METER READING 9/30/03 3,078,250

2) Total VOCs using EPA Method 624.

Signature:

Jack Marsch

Date:

12/8/03

ONEIDA COUNTY SEWER DISTRICT
INDUSTRIAL USER REPORT CERTIFICATION

Submit To:
ATTN: PRETREATMENT
ONEIDA COUNTY SEWER DISTRICT
PO BOX 442
UTICA NY 13503

From
JACK MARSCH
NYSDEC REGION 6
207 GENESEE STREET
UTICA NY 13501

Site
PRIMOSHIELD SITE
1212 ST. VINCENT STREET
UTICA NY 13501

ATTACH TO REPORT DATED: DECEMBER 8, 2003

REPORTING PERIOD: MAY 31, 2003 to NOVEMBER 30, 2003

The following certification of information provided in industrial user reports is made in compliance with the General Pretreatment Regulations.

I. Compliance or Non-Compliance Status: Ref = 40 CFR 403.12(b)(6)

Check A or B. If B is checked, attach a statement describing O&M and/or pretreatment required; include the shortest schedule by which you can provide the required O&M and/or pretreatment.

☒ A. I certify that Pretreatment Standards are being met on a consistent basis.

☐ B. I certify that Pretreatment Standards are NOT being met on a consistent basis, and that additional operation and maintenance (O&M) and/or additional pretreatment is required to achieve compliance with Pretreatment Standards and Requirements.

2. Information Certification: Ref = 40 CFR 403.6(a)(2)(ii)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Signature: Jack Marsch

Title: EE 2

Date: 12/8/03

PLEASE ATTACH THIS CERTIFICATION TO THE SEMI-ANNUAL & OTHER REPORTS THAT YOU SUBMIT TO THE ONEIDA COUNTY SEWER DISTRICT.

DATA COMMENT PAGE

ORGANIC DATA QUALIFIERS

- ND or U Indicates compound was analyzed for, but not detected at or above the reporting limit.
- J Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed, or when the data indicates the presence of a compound that meets the identification criteria but the result is less than the sample quantitation limit but greater than zero.
- C This flag applies to pesticide results where the identification has been confirmed by GC/MS.
- B This flag is used when the analyte is found in the associated blank, as well as in the sample.
- E This flag identifies compounds whose concentrations exceed the calibration range of the instrument for that specific analysis.
- D This flag identifies all compounds identified in an analysis at the secondary dilution factor.
- N Indicates presumptive evidence of a compound. This flag is used only for tentatively identified compounds, where the identification is based on the Mass Spectral library search. It is applied to all TIC results.
- P This flag is used for a pesticide/Aroclor target analyte when there is greater than 25% difference for detected concentrations between the two GC columns. The lower of the two values is reported on the data page and flagged with a "P".
- A This flag indicates that a TIC is a suspected aldol-condensation product.
- † Indicates coelution.
- * Indicates analysis is not within the quality control limits.

INORGANIC DATA QUALIFIERS

- ND or U Indicates element was analyzed for, but not detected at or above the reporting limit.
- J or B Indicates a value greater than or equal to the instrument detection limit, but less than the quantitation limit.
- N Indicates spike sample recovery is not within the quality control limits.
- K Indicates the post digestion spike recovery is not within the quality control limits.
- S Indicates value determined by the Method of Standard Addition.
- M Indicates duplicate injection results exceeded quality control limits.
- W Post digestion spike for Furnace AA analysis is out of quality control limits (85-115%) while sample absorbance is less than 50% of spike absorbance.
- E Indicates a value estimated or not reported due to the presence of interferences.
- H Indicates analytical holding time exceedance. The value obtained should be considered an estimate.
- * Indicates analysis is not within the quality control limits.
- + Indicates the correlation coefficient for the Method of Standard Addition is less than 0.995.

NYS DEC
NYS DEC ASP CONTRACT #C004154 - REGION 6
NYSDEC - EPA ASP00 VOLATILES - W
ANALYSIS DATA SHEET

Client No.

916601

Lab Name: STL BuffaloContract: C004154Lab Code: RECNY Case No.: SH603 SAS No.: _____ SDG No.: 09301Matrix: (soil/water) WATERLab Sample ID: A3944601Sample wt/vol: 5.00 (g/mL) MLLab File ID: F2982.RRLevel: (low/med) LOWDate Samp/Recv: 09/30/2003 10/01/2003% Moisture: not dec. _____ Heated Purge: NDate Analyzed: 10/04/2003GC Column: DB-624 ID: 0.25 (mm)Dilution Factor: 1.00

Soil Extract Volume: _____ (uL)

Soil Aliquot Volume: _____ (uL)

CONCENTRATION UNITS:

CAS NO. COMPOUND (ug/L or ug/Kg) UG/L Q

74-87-3-----	Chloromethane	10	U
74-83-9-----	Bromomethane	10	U
75-01-4-----	Vinyl chloride	10	U
75-00-3-----	Chloroethane	10	U
75-09-2-----	Methylene chloride	10	U
67-64-1-----	Acetone	10	U
75-15-0-----	Carbon disulfide	10	U
75-35-4-----	1,1-Dichloroethene	10	U
75-34-3-----	1,1-Dichloroethane	10	U
67-66-3-----	Chloroform	10	U
107-06-2-----	1,2-Dichloroethane	10	U
78-93-3-----	2-Butanone	10	U
71-55-6-----	1,1,1-Trichloroethane	14	
56-23-5-----	Carbon tetrachloride	10	U
75-27-4-----	Bromodichloromethane	10	U
78-87-5-----	1,2-Dichloropropane	10	U
10061-01-5----	cis-1,3-Dichloropropene	10	U
79-01-6-----	Trichloroethene	36	
124-48-1-----	Dibromochloromethane	10	U
79-00-5-----	1,1,2-Trichloroethane	10	U
71-43-2-----	Benzene	10	U
10061-02-6----	trans-1,3-Dichloropropene	10	U
75-25-2-----	Bromoform	10	U
108-10-1-----	4-Methyl-2-pentanone	10	U
591-78-6-----	2-Hexanone	10	U
127-18-4-----	Tetrachloroethene	10	U
108-88-3-----	Toluene	10	U
79-34-5-----	1,1,2,2-Tetrachloroethane	10	U
108-90-7-----	Chlorobenzene	10	U
100-41-4-----	Ethylbenzene	10	U
100-42-5-----	Styrene	10	U
1330-20-7-----	Xylene, Total	10	U
75-71-8-----	Dichlorodifluoromethane	10	U
75-69-4-----	Trichlorofluoromethane	10	U

NYS DEC
NYS DEC ASP CONTRACT #C004154 - REGION 6
NYSDEC - EPA ASP00 VOLATILES - W
ANALYSIS DATA SHEET

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916601

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Soil Extract Volume: _____ (uL)

Soil Aliquot Volume: _____ (uL)

CONCENTRATION UNITS:

CAS NO.	COMPOUND	(ug/L or ug/Kg)	UG/L	Q
76-13-1-----	1,1,2-Trichloro-1,2,2-Trifluoroethane		10	U
156-60-5-----	trans-1,2-Dichloroethene		10	U
1634-04-4-----	Methyl tert-butyl ether		10	U
156-59-2-----	cis-1,2-Dichloroethene		10	U
110-82-7-----	Cyclohexane		10	U
108-87-2-----	Methylcyclohexane		10	U
106-93-4-----	1,2-Dibromoethane (Ethylene dibromide)		10	U
98-82-8-----	Isopropylbenzene		10	U
541-73-1-----	1,3-Dichlorobenzene		10	U
106-46-7-----	1,4-Dichlorobenzene		10	U
95-50-1-----	1,2-Dichlorobenzene		10	U
96-12-8-----	1,2-Dibromo-3-chloropropane		10	U
120-82-1-----	1,2,4-Trichlorobenzene		10	U
79-20-9-----	Methyl Acetate		10	U

NYS DEC
NYS DEC ASP CONTRACT #C004154 - REGION 6
NYSDEC - EPA ASP00 VOLATILES - W
TENTATIVELY IDENTIFIED COMPOUNDS

Client No.

916601

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% Moisture: not dec. _____

Date Analyzed: 10/04/2003GC Column: DB-624 ID: 0.25 (mm)Dilution Factor: 1.00

Soil Extract Volume: _____ (uL)

Soil Aliquot Volume: _____ (uL)

Number TICs found: 0CONCENTRATION UNITS:
(ug/L or ug/Kg) UG/L

CAS NO.	Compound Name	RT	Est. Conc.	Q

NYS DEC
NYS DEC ASP CONTRACT #C004154 - REGION 6
NYSDEC - EPA ASP00 VOLATILES - W
ANALYSIS DATA SHEET

Client No.

9166TB

Lab Name: STL BuffaloContract: C004154Lab Code: RECONYCase No.: SH603

SAS No.: _____

SDG No.: 09301Matrix: (soil/water) WATERLab Sample ID: A3944602Sample wt/vol: 5.00 (g/mL) MLLab File ID: F2976.RRLevel: (low/med) LOWDate Samp/Recv: 09/30/2003 10/01/2003% Moisture: not dec. _____ Heated Purge: NDate Analyzed: 10/04/2003GC Column: DB-624 ID: 0.25 (mm)Dilution Factor: 1.00

Soil Extract Volume: _____ (uL)

Soil Aliquot Volume: _____ (uL)

CONCENTRATION UNITS:

CAS NO.	COMPOUND	(ug/L or ug/Kg)	UG/L	Q
74-87-3-----	Chloromethane		10	U
74-83-9-----	Bromomethane		10	U
75-01-4-----	Vinyl chloride		10	U
75-00-3-----	Chloroethane		10	U
75-09-2-----	Methylene chloride		10	U
67-64-1-----	Acetone		10	U
75-15-0-----	Carbon disulfide		10	U
75-35-4-----	1,1-Dichloroethene		10	U
75-34-3-----	1,1-Dichloroethane		10	U
67-66-3-----	Chloroform		10	U
107-06-2-----	1,2-Dichloroethane		10	U
78-93-3-----	2-Butanone		10	U
71-55-6-----	1,1,1-Trichloroethane		10	U
56-23-5-----	Carbon tetrachloride		10	U
75-27-4-----	Bromodichloromethane		10	U
78-87-5-----	1,2-Dichloropropane		10	U
10061-01-5----	cis-1,3-Dichloropropene		10	U
79-01-6-----	Trichloroethene		10	U
124-48-1-----	Dibromochloromethane		10	U
79-00-5-----	1,1,2-Trichloroethane		10	U
71-43-2-----	Benzene		10	U
10061-02-6----	trans-1,3-Dichloropropene		10	U
75-25-2-----	Bromoform		10	U
108-10-1-----	4-Methyl-2-pentanone		10	U
591-78-6-----	2-Hexanone		10	U
127-18-4-----	Tetrachloroethene		10	U
108-88-3-----	Toluene		10	U
79-34-5-----	1,1,2,2-Tetrachloroethane		10	U
108-90-7-----	Chlorobenzene		10	U
100-41-4-----	Ethylbenzene		10	U
100-42-5-----	Styrene		10	U
1330-20-7-----	Xylene, Total		10	U
75-71-8-----	Dichlorodifluoromethane		10	U
75-69-4-----	Trichlorofluoromethane		10	U

NYS DEC
NYS DEC ASP CONTRACT #C004154 - REGION 6
NYSDEC - EPA ASP00 VOLATILES - W
ANALYSIS DATA SHEET

Client No.

9166TB

Lab Name: STL BuffaloContract: C004154Lab Code: REONY Case No.: SH603 SAS No.: _____ SDG No.: 09301Matrix: (soil/water) WATERLab Sample ID: A3944602Sample wt/vol: 5.00 (g/mL) MLLab File ID: F2976.RRLevel: (low/med) LOWDate Samp/Recv: 09/30/2003 10/01/2003% Moisture: not dec. _____ Heated Purge: NDate Analyzed: 10/04/2003GC Column: DB-624 ID: 0.25 (mm)Dilution Factor: 1.00

Soil Extract Volume: _____ (uL)

Soil Aliquot Volume: _____ (uL)

CONCENTRATION UNITS:

CAS NO. COMPOUND (ug/L or ug/Kg) UG/L Q

76-13-1-----	1,1,2-Trichloro-1,2,2-Trifluoroethane	10	U
156-60-5-----	trans-1,2-Dichloroethene	10	U
1634-04-4-----	Methyl tert-butyl ether	10	U
156-59-2-----	cis-1,2-Dichloroethene	10	U
110-82-7-----	Cyclohexane	10	U
108-87-2-----	Methylcyclohexane	10	U
106-93-4-----	1,2-Dibromoethane (Ethylene dibromide)	10	U
98-82-8-----	Isopropylbenzene	10	U
541-73-1-----	1,3-Dichlorobenzene	10	U
106-46-7-----	1,4-Dichlorobenzene	10	U
95-50-1-----	1,2-Dichlorobenzene	10	U
96-12-8-----	1,2-Dibromo-3-chloropropane	10	U
120-82-1-----	1,2,4-Trichlorobenzene	10	U
79-20-9-----	Methyl Acetate	10	U

NYS DEC
NYS DEC ASP CONTRACT #C004154 - REGION 6
NYSDEC - EPA ASP00 VOLATILES - W
TENTATIVELY IDENTIFIED COMPOUNDS

Client No.

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Lab Name: STL Buffalo Contract: C004154Lab Code: RECONY Case No.: SH603 SAS No.: _____ SDG No.: 09301Matrix: (soil/water) WATERLab Sample ID: A3944602Sample wt/vol: 5.00 (g/mL) MLLab File ID: F2976.RRLevel: (low/med) LOWDate Samp/Recv: 09/30/2003 10/01/2003

% Moisture: not dec. _____

Date Analyzed: 10/04/2003GC Column: DB-624 ID: 0.25 (mm)Dilution Factor: 1.00

Soil Extract Volume: _____ (uL)

Soil Aliquot Volume: _____ (uL)

Number TICs found: 0CONCENTRATION UNITS:
(ug/L or ug/Kg) UG/L

CAS NO.	Compound Name	RT	Est. Conc.	Q

NYS DEC

-1-

INORGANIC ANALYSIS DATA SHEET

SAMPLE NO.

916601

Contract: NY00-096

Lab Code: STLBFL0

Case No.: SH603

SAS No.:

SDG NO.: 09301

Matrix (soil/water): WATER

Lab Sample ID: AD349729

Level (low/med): LOW

Date Received: 10/1/2003

Concentration Units (ug/L or mg/kg dry weight): UG/L

CAS No.	Analyte	Concentration	C	Q	M
7429-90-5	Aluminum	135	B		P
7440-36-0	Antimony	4.1	U		P
7440-38-2	Arsenic	4.3	B		P
7440-39-3	Barium	96.4	B		P
7440-41-7	Beryllium	0.42	B		P
7440-43-9	Cadmium	0.30	U		P
7440-70-2	Calcium	124000			P
7440-47-3	Chromium	0.90	U		P
7440-48-4	Cobalt	2.7	B		P
7440-50-8	Copper	4.2	B		P
7439-89-6	Iron	43.6	B		P
7439-92-1	Lead	1.6	U		P
7439-95-4	Magnesium	38500			P
7439-96-5	Manganese	4.0	B		P
7440-02-0	Nickel	120			P
7440-09-7	Potassium	4600	B		P
7782-49-2	Selenium	2.8	U		P
7440-22-4	Silver	0.70	U		P
7439-97-6	Mercury	0.055	U		CV
7440-23-5	Sodium	52900			P
7440-28-0	Thallium	3.8	U		P
7440-62-2	Vanadium	0.80	U		P
7440-66-6	Zinc	4.2	B		P

Color Before: COLORLESS

Clarity Before: CLEAR

Texture: NONE

Color After: COLORLESS

Clarity After: CLEAR

Artifacts:

Comments:

NYS DEC
NYS DEC ASP Contract #C004154 - Region 6
Wet Chemistry Analysis

Client Sample No.

916601

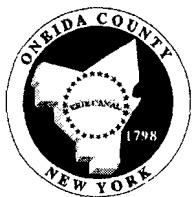
Lab Name: STL BuffaloContract: C004154Lab Code: RECNYCase No.: SH603

SAS No.: _____

SDG No.: 09301Matrix (soil/water): WATERLab Sample ID: A3944601% Solids: 0.0Date Samp/Recv: 09/30/2003 10/01/2003

Parameter Name	Units of Measure	Result	C	Q	M	Method Number	Analyzed Date
Cyanide - Total	MG/L	0.010	U			CLP-WC	10/02/2003
pH	S.U.	7.24				150.1	10/01/2003

Comments:



**ONEIDA COUNTY DEPARTMENT OF
WATER QUALITY & WATER POLLUTION CONTROL**

51 Leland Ave, PO Box 442, Utica, NY 13503-0442
(315)-798-5656 FAX 724-9812

Joe Laddin
PR

Joseph A. Griffo
County Executive

Steven P. Devan, P.E.
Commissioner

October 3, 2003

GERALD RIDER
NYSDEC
625 BROADWAY
ALBANY NY 12233

SEP 29 2003

Remediation Site: PRIMOSHIELD c/o NYSDEC

Re: Semi-Annual Report Requirements

Oneida County Groundwater Discharge Permits require that self-monitoring reports and certification statements be submitted on a semi-annual basis; the report due dates are May 31 and November 30 of each year.

Every day a report is late is considered a Violation of Pretreatment Standards. In addition to daily violations, the Federal General Pretreatment Regulations [40 CFR 403.8(F)(2)(vii)] have defined reports late by more than thirty (30) days as being in "Significant Non-Compliance" (SNC).

To avoid possible enforcement actions because of late reports, take your semi-annual self-monitoring samples well in advance of the due date to allow for the turn-around time necessary to receive the results from your contract laboratory.

Note: As a result of USEPA & NYSDEC pretreatment audits the OCSD requires that your contract laboratory include a method reference and chain of custody information with all analytical reports. The laboratories are required to use methods listed in 40 CFR 136 for pretreatment compliance monitoring.

Please disregard this notice if you have already submitted your report.

Sincerely,

**THE ONEIDA COUNTY DEPARTMENT OF
WATER QUALITY & WATER POLLUTION CONTROL**

R.D. Hoffman

R.D. Hoffman
Industrial Wastes Chemist

ONEIDA COUNTY SEWER DISTRICT REPORTING FORM

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PRIMOSHIELD SITE
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REPORTING PERIOD: _____ to _____

SAMPLING RESULTS:

For Semi-Annual Reporting, a grab sample of the Primoshield Site discharge to the sanitary sewer is analyzed for the pollutants listed. Attach signed Report Certification.

In response to any violations incurred, self-monitor for pollutant in violation at least once a week until there are results for three consecutive sampling events which are in full compliance with Permit Limits. Submit all results for all samples taken. The first resampling result is due within thirty (30) days; a complete report with all three resampling results is due within sixty (60) days. Attach signed Report Certification.

ATTACH COPIES OF ALL CONTRACT LABORATORY REPORTS AND MANIFESTS OF HAZARDOUS WASTE SHIPMENTS FOR THE REPORTING PERIOD.

POLLUTANT PARAMETER	DAILY MAXIMUM LIMIT	ANALYSIS SAMPLE #1	ANALYSIS SAMPLE #2	ANALYSIS SAMPLE #3
Date Sampled				
Sample Number				
Discharge Flow (Note 1)				
pH	5.0-12.5			
Cadmium, mg/L	1.0			
Chromium, mg/L	5.0			
Copper, mg/L	3.0			
Lead, mg/L	5.0			
Nickel, mg/L	2.0			
Zinc, mg/L	4.0			
Cyanide, mg/L	3.0			
Total VOCs (Note 2)	2.0			

1) Attach monthly flow totalizer data.

2) Total VOCs using EPA Method 624.

Signature: _____ Date: _____

ONEIDA COUNTY SEWER DISTRICT
INDUSTRIAL USER REPORT CERTIFICATION

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ATTACH TO REPORT DATED: _____

REPORTING PERIOD: _____ to _____

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1. Compliance or Non-Compliance Status: Ref = 40 CFR 403.12(b)(6)

Check A or B. If B is checked, attach a statement describing O&M and/or pretreatment required; include the shortest schedule by which you can provide the required O&M and/or pretreatment.

☐ A. I certify that Pretreatment Standards are being met on a consistent basis.

☐ B. I certify that Pretreatment Standards are NOT being met on a consistent basis, and that additional operation and maintenance (O&M) and/or additional pretreatment is required to achieve compliance with Pretreatment Standards and Requirements.

2. Information Certification: Ref = 40 CFR 403.6(a)(2)(ii)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Signature: _____

Title: _____

Date: _____

PLEASE ATTACH THIS CERTIFICATION TO THE SEMI-ANNUAL & OTHER REPORTS THAT YOU SUBMIT TO THE ONEIDA COUNTY SEWER DISTRICT.