

**BOARD OF SUPERVISORS**  
**Agenda Item**



<b>Meeting Date:</b>	April 21, 2015
<b>Title:</b>	Authorize the County Administrator to Execute a Consent Order with the Virginia Department of Environmental Quality
<b>Department:</b>	Utilities
<b>Staff Contact:</b>	Mike Smith, Director
<b>Board Committee/ Other BACC:</b>	Utilities Commission
<b>Staff Recommendation:</b>	Approval
<b>Budget Impact:</b>	See Background Report
<b>Time Sensitivity:</b>	See Background Report

**ATTACHMENTS:**

1.	Background Report	3.	Proposed Resolution R15-125
2.	Consent Order		

<input checked="" type="checkbox"/>	<b>Consent Agenda</b>	<input type="checkbox"/>	<b>Other Business</b>	<input type="checkbox"/>	<b>Unfinished Business</b>
	<b>Discussion</b>		<b>Presentation</b>		<b>Work Session</b>
	<b>New Business</b>		<b>Public Hearing</b>		<b>Add-On</b>

**REVIEW:**

<input checked="" type="checkbox"/>	County Administrator	
<input checked="" type="checkbox"/>	County Attorney	

<b>DISTRICT:</b>	N/A
------------------	-----

## **BACKGROUND REPORT**

The Virginia Department of Environmental Quality (DEQ) issued a Consent Order to the Board of Supervisors for the Aquia Wastewater Treatment Plant and the Little Falls Run Wastewater Treatment Plant, in response to two sewage overflows in 2014. The Department of Utilities was alerted to both incidents by Stafford Citizens, and immediately notified DEQ of the spills and the steps taken to correct the situation.

The first overflow occurred on August 12, 2014, at the Claiborne Run Pump Station, due to a broken force main, which, resulted in a spill that entered Claiborne Run Creek, located in the Rappahannock River Basin. Crews were dispatched to repair the 24-inch force main. The pipe failure was caused by a deteriorated clamp that was installed by the Virginia Department of Transportation contractor during the widening of Cool Spring Road in 2004. When crews arrived on site and discovered the broken clamp, it was replaced with a stainless steel clamp which will better resist corrosion from the acidic soils.

The second spill occurred on November 25, 2014, due to a blockage in the sewage interceptor along Woodstream Boulevard. Crews were dispatched upon notification and discovered a blockage caused by rocks and debris. The blockage was in a very deep sewer which required the assistance of an on-call contractor. Crews set up a pump around of the area to stop the spill until the contractor could mobilize and remove the blockage, but not before the spill entered an unnamed tributary of Aquia Creek. The blockage is believed to be caused by degraded pipes upstream from the area. The field crew has been routinely inspecting the immediate area and using a Vactor Truck to clean the lines of any debris. A manhole and adjacent pipes, immediately upstream from the blockage are scheduled to be replaced this summer. The field crew has also scheduled to conduct a closed circuit television inspection of the lines further upstream to identify any deficiencies.

The discharge of sewage into State waters is a violation of the National Pollution Discharge Elimination Permits for the two wastewater treatment facilities and therefore resulted in a Consent Order from DEQ. The Consent Order (Attachment 2) requires payment of a civil charge to DEQ for Thirty-six Thousand Four Hundred Dollars (\$36,400). The Consent Order also requires the County to provide a plan of action to prevent further blockages, which will include the steps outlined above.

Staff has requested DEQ consider a Thirty percent (30%) reduction to the Civil Charge amount, as provided in the DEQ enforcement manual, due to the County's cooperation and rapid response and reporting of the overflows. It is expected that this reduction will be granted. Staff also recommends requesting DEQ allow 90% of the amount be applied to a Supplemental Environmental Project (SEP). The form of this SEP would be a direct contribution to the Crow's Nest Nature Preserve. If DEQ approves the reduction to a payment of Twenty-five Thousand Four Hundred Eighty Dollars, and the Board approves an application for an SEP, ninety percent, or Twenty-two Thousand Nine Hundred Thirty-two Dollars (\$22,932) will go to Crow's Nest nature preserve and Two Thousand Four Hundred Fifty-Eight will be paid to DEQ as a Civil Charge. If neither of the above is approved, the full amount of \$36,400 will be due to DEQ.

The Utilities Department is prepared to comply with the Consent Order, and recommends approval of proposed Resolution R15-125, which authorizes the County Administrator to execute the Consent Order and pay the resulting civil charge and/or SEP amount. Funds are available in the Utilities Department FY2015 Operations budget.

The Utilities Commission considered this matter at its April 14<sup>th</sup> meeting and voted 4 – 0 (Ms. Arndt, Mr. Dunn, and Mr. Howard were absent) to recommend approval of proposed Resolution R15-125.



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

13901 Crown Court, Woodbridge, Virginia 22193

(703) 583-3800 Fax (703) 583-3821

www.deq.virginia.gov

Molly Joseph Ward  
Secretary of Natural Resources

David K. Paylor  
Director

Thomas A. Faha  
Regional Director

**STATE WATER CONTROL BOARD  
ENFORCEMENT ACTION - ORDER BY CONSENT  
ISSUED TO  
STAFFORD COUNTY BOARD OF SUPERVISORS  
FOR  
SANITARY SEWER COLLECTION SYSTEMS  
ASSOCIATED WITH  
THE  
AQUIA WASTEWATER TREATMENT FACILITY  
VPDES PERMIT NO. VA0060968  
AND  
THE  
LITTLE FALLS RUN WASTEWATER TREATMENT PLANT  
VPDES PERMIT NO. VA0076392**

### **SECTION A: Purpose**

This is a Consent Order issued under the authority of Va. Code § 62.1-44.15, between the State Water Control Board and the Stafford County Board of Supervisors, regarding the Sanitary Sewer Collection Systems associated with the Little Falls Run Wastewater Treatment Plant and the Aquia Wastewater Treatment Facility for the purpose of resolving certain violations of State Water Control Law and the applicable permit and regulation.

### **SECTION B: Definitions**

Unless the context clearly indicates otherwise, the following words and terms have the meaning assigned to them below:

1. "305(b) report" means the report required by Section 305(b) of the Clean Water Act (33 United States Code § 1315(b)), and Va. Code § 62.1-44.19:5 for providing Congress and

the public an accurate and comprehensive assessment of the quality of State surface waters.

2. “Aquia Facility” means the Aquia Wastewater Treatment Facility located at 75 Coal Landing Road, Stafford, Stafford County, Virginia, which treats and discharges treated sewage from domestic, commercial, and light industrial sources.
3. “Aquia Permit” means VPDES Permit No. VA0060968, which was issued under the State Water Control Law and the Regulation to the Stafford County Board of Supervisors on November 20, 2013, and which expires on November 19, 2018.
4. “Board” means the State Water Control Board, a permanent citizens’ board of the Commonwealth of Virginia, as described in Va. Code §§ 10.1-1184 and 62.1-44.7.
5. “Collection System” means the sanitary sewer collection system owned by Stafford County Board of Supervisors.
6. “County” means the Stafford County Board of Supervisors, a political subdivision of the Commonwealth of Virginia. The Stafford County Board of Supervisors is a “person” within the meaning of Va. Code § 62.1-44.3.
7. “Department” or “DEQ” means the Department of Environmental Quality, an agency of the Commonwealth of Virginia, as described in Va. Code § 10.1-1183.
8. “Director” means the Director of the Department of Environmental Quality, as described in Va. Code § 10.1-1185.
9. “Discharge” means discharge of a pollutant. 9 VAC 25-31-10.
10. “Discharge of a pollutant” when used with reference to the requirements of the VPDES permit program means:
  - a. Any addition of any pollutant or combination of pollutants to surface waters from any point source; or
  - b. Any addition of any pollutant or combination of pollutants to the waters of the contiguous zone or the ocean from any point source other than a vessel or other floating craft which is being used as a means of transportation.
11. “Effluent” means wastewater – treated or untreated – that flows out of a treatment plant, sewer, or industrial outfall.

12. "Little Falls Facility" means the Little Falls Run Wastewater Treatment Plant located at 952 Kings Highway, Fredericksburg, Stafford County, Virginia, which treats and discharges treated sewage from domestic, commercial, and light industrial sources.
13. "Little Falls Permit" means VPDES Permit No. VA0076392, which was issued under the State Water Control Law and the Regulation to the Stafford County Board of Supervisors on September 29, 2010, and which expires on September 28, 2015.
14. "MGD" means million gallons per day.
15. "NOV" means Notice of Violation.
16. "NRO" means the Northern Regional Office of DEQ, located in Woodbridge, Virginia.
17. "Order" means this document, also known as a "Consent Order" or "Order by Consent," a type of Special Order under the State Water Control Law.
18. "Pollutant" means dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials (except those regulated under the Atomic Energy Act of 1954, as amended (42 USC § 2011 *et seq.*), heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water...  
9 VAC 25-31-10.
19. "Pollution" means such alteration of the physical, chemical, or biological properties of any state waters as will or is likely to create a nuisance or render such waters (a) harmful or detrimental or injurious to the public health, safety, or welfare or to the health of animals, fish, or aquatic life; (b) unsuitable with reasonable treatment for use as present or possible future sources of public water supply; or (c) unsuitable for recreational, commercial, industrial, agricultural, or other reasonable uses, provided that (i) an alteration of the physical, chemical, or biological property of state waters or a discharge or deposit of sewage, industrial wastes or other wastes to state waters by any owner which by itself is not sufficient to cause pollution but which, in combination with such alteration of or discharge or deposit to state waters by other owners, is sufficient to cause pollution; (ii) the discharge of untreated sewage by any owner into state waters; and (iii) contributing to the contravention of standards of water quality duly established by the Board, are "pollution." Va. Code § 62.1-44.3.
20. "Regulation" means the VPDES Permit Regulation, 9 VAC 25-31-10 *et seq.*
21. "SSO" means Sanitary Sewer Overflow.
22. "State Water Control Law" means Chapter 3.1 (§ 62.1-44.2 *et seq.*) of Title 62.1 of the Va. Code.

23. “State waters” means all water, on the surface and under the ground, wholly or partially within or bordering the Commonwealth or within its jurisdiction, including wetlands. Va. Code § 62.1-44.3.
24. “TV” means the television inspection of the sewer lines.
25. “Va. Code” means the Code of Virginia (1950), as amended.
26. “VAC” means the Virginia Administrative Code.
27. “VPDES” means Virginia Pollutant Discharge Elimination System.
28. “Warning Letter” or “WL” means a type of Notice of Violation under Va. Code § 62.1-44.15.

### **SECTION C: Findings of Fact and Conclusions of Law**

1. The County owns and operates the Little Falls Facility located in Stafford County, Virginia. The Little Falls Permit authorizes the County to discharge treated sewage from domestic, commercial, and light industrial sources from the Little Falls Facility, to the Rappahannock River, in strict compliance with the terms and conditions of the Permit. The design flow of the Facility is 8.0 MGD.
2. Claiborne Run is located within the Rappahannock River Basin. This segment is listed in DEQ’s 2012 305(b)/303(d) Integrated Report as not supporting the recreation use due to exceedances of the maximum *E. coli* bacteria criterion and for impairments to fish consumption, due to PCBs.
3. On August 12, 2014, County staff reported a discharge of approximately 740,000 gallons of sewage from a manhole at the Claiborne Run Pump Station located at 146 Cool Springs Road into Claiborne Run. The Claiborne Run Pump Station is located within the Little Falls Facility collection system. County staff attributed the cause of the discharge to a force main break. This incident was assigned IR#2015-N-0439.
4. The Little Falls Permit at Part II.F states: “Except in compliance with this permit, or another permit issued by the Board, it shall be unlawful for any person to: 1. Discharge into state waters sewage, industrial wastes, other wastes, or any noxious or deleterious substances; or 2. Otherwise alter the physical, chemical, or biological properties of such state waters and make them detrimental to the public health, or to animal or aquatic life, or to the use of such waters for domestic or industrial consumption, or for recreation, or for other uses.”

5. As a result of the reported August 12, 2014 SSO, DEQ issued a NOV, No. W2014-10-N-0002, to the County, dated October 22, 2014.
6. The County owns and operates the Aquia Facility located in Stafford County, Virginia. The Aquia Permit authorizes the County to discharge treated sewage from domestic, commercial, and light industrial sources from the Aquia Facility, to an unnamed tributary to Austin Run, in strict compliance with the terms and conditions of the Permit. The design flow of the Facility is 10.0 MGD.
7. Aquia Creek is located within the Potomac River Basin. This segment is listed in DEQ's 2012 305(b)/303(d) Integrated Report for impairments to fish consumption, due to PCBs.
8. On November 25, 2014, County staff reported a discharge of approximately 450,000 gallons of sewage from the Woodstream Sanitary Sewer Easement area located at 281 Woodstream Boulevard, into an unnamed tributary to Aquia Creek. The easement is located within the Aquia Facility collection system. The County attributed the cause of the discharge to a line blockage. This incident was assigned IR#2015-N-1290.
9. The Aquia Permit at Part II.F states: "Except in compliance with this permit, or another permit issued by the Board, it shall be unlawful for any person to: a. Discharge into state waters sewage, industrial wastes, other wastes, or any noxious or deleterious substances; or 2. Otherwise alter the physical, chemical, or biological properties of such state waters and make them detrimental to the public health, or to animal or aquatic life, or to the use of such waters for domestic or industrial consumption, or for recreation, or for other uses.
10. As a result of the reported November 25, 2014 SSO, DEQ issued a NOV, No. W2014-12-N-0005, to the County, dated December 17, 2014.
11. On December 9, 2014, representatives of the County met with DEQ staff to discuss the reported SSOs. At the meeting County staff stated that the County is currently working on reconditioning projects to upgrade the collection system and the pump stations serving the County.
12. On March 12, 2015, County stated in an email to DEQ, that the County was planning to replace the manhole just upstream from the blockage causing the November 2014 SSO along with the adjacent sewer lines within the Woodstream Sanitary Sewer Easement Area. In addition, Stafford would schedule the TVing of the lines farther upstream in order to investigate the line for other failures outside the November 2014 SSO incident area.
13. Va. Code § 62.1-44.5 states that: "[E]xcept in compliance with a certificate issued by the Board, it shall be unlawful for any person to discharge into state waters sewage, industrial wastes, other wastes, or any noxious or deleterious substances."

14. The Regulation, at 9 VAC 25-31-50, also states that except in compliance with a VPDES permit, or another permit issued by the Board, it is unlawful to discharge into state waters sewage, industrial wastes or other wastes.
15. Va. Code § 62.1-44.15(5a) states that a VPDES permit is a “certificate” under the statute.
16. Aquia Creek is a surface water located wholly within the Commonwealth and is a “state water” under the State Water Control Law.
17. Claiborne Run is a surface water located wholly within the Commonwealth and is a “state water” under the State Water Control Law.
18. Based on the SSO reports, and submitted documents, the Board concludes that the County has violated the Little Falls Permit and Va. Code § 62.1-44.5 and 9 VAC 25-31-50, by discharging untreated sewage and domestic wastes from the collection system, as described in paragraph C(3) above.
19. Based on the SSO reports, and submitted documents, the Board concludes that the County has violated the Aquia Permit and Va. Code § 62.1-44.5 and 9 VAC 25-31-50, by discharging untreated sewage and domestic wastes from the collection system, as described in paragraph(8) above.
20. The County has submitted documentation that verifies that the violations as described in paragraph C(3), above, have been corrected.

**SECTION D: Agreement and Order**

Accordingly, by virtue of the authority granted it in Va. Code §§ 62.1-44.15, the Board orders the County, and the County agrees to:

1. Perform the actions described in Appendix A of this Order; and
2. Pay a civil charge \$36,400.00 within 30 days of the effective date of the Order in settlement of the violations cited in this Order.

Payment shall be made by check, certified check, money order or cashier’s check payable to the “Treasurer of Virginia,” and delivered to:

Receipts Control  
Department of Environmental Quality  
Post Office Box 1104  
Richmond, Virginia 23218



The County shall include its Federal Employer Identification Number (FEIN) with the civil charge payment and shall indicate that the payment is being made in accordance with the requirements of this Order for deposit into the Virginia Environmental Emergency Response Fund (VEERF). If the Department has to refer collection of moneys due under this Order to the Department of Law, the County shall be liable for attorneys' fees of 30% of the amount outstanding.

### **SECTION E: Administrative Provisions**

1. The Board may modify, rewrite, or amend this Order with consent of the County for good cause shown by the County, or on its own motion pursuant to the Administrative Process Act, Va. Code § 2.2-4000 *et seq.*, after notice and opportunity to be heard.
2. This Order addresses and resolves only those violations specifically identified in Section C of this Order. This Order shall not preclude the Board or the Director from taking any action authorized by law, including but not limited to: (1) taking any action authorized by law regarding any additional, subsequent, or subsequently discovered violations; (2) seeking subsequent remediation of the Facility; or (3) taking subsequent action to enforce the Order.
3. For purposes of this Order and subsequent actions with respect to this Order only, the County admits the jurisdictional allegations, findings of fact, and conclusions of law contained herein.
4. The County consents to venue in the Circuit Court of the City of Richmond for any civil action taken to enforce the terms of this Order.
5. The County declares it has received fair and due process under the Administrative Process Act and the State Water Control Law and it waives the right to any hearing or other administrative proceeding authorized or required by law or regulation, and to any judicial review of any issue of fact or law contained herein. Nothing herein shall be construed as a waiver of the right to any administrative proceeding for, or to judicial review of, any action taken by the Board to modify, rewrite, amend, or enforce this Order.
6. Failure by the County to comply with any of the terms of this Order shall constitute a violation of an order of the Board. Nothing herein shall waive the initiation of appropriate enforcement actions or the issuance of additional orders as appropriate by the Board or the Director as a result of such violations. Nothing herein shall affect appropriate enforcement actions by any other federal, state, or local regulatory authority.
7. If any provision of this Order is found to be unenforceable for any reason, the remainder of the Order shall remain in full force and effect.

8. The County shall be responsible for failure to comply with any of the terms and conditions of this Order unless compliance is made impossible by earthquake, flood, other acts of God, war, strike, or such other occurrence. The County shall demonstrate that such circumstances were beyond its control and not due to a lack of good faith or diligence on its part. The County shall notify the DEQ Regional Director verbally within 24 hours and in writing within three business days when circumstances are anticipated to occur, are occurring, or have occurred that may delay compliance or cause noncompliance with any requirement of the Order. Such notice shall set forth:
  - a. the reasons for the delay or noncompliance;
  - b. the projected duration of any such delay or noncompliance;
  - c. the measures taken and to be taken to prevent or minimize such delay or noncompliance; and
  - d. the timetable by which such measures will be implemented and the date full compliance will be achieved.

Failure to so notify the Regional Director verbally within 24 hours and in writing within three business days, of learning of any condition above, which the County intends to assert will result in the impossibility of compliance, shall constitute a waiver of any claim to inability to comply with a requirement of this Order.

9. This Order is binding on the parties hereto, their successors in interest, designees and assigns, jointly and severally.
10. This Order shall become effective upon execution by both the Director or his designee and the County. Nevertheless, the County agrees to be bound by any compliance date which precedes the effective date of this Order.
11. This Order shall continue in effect until:
  - a. The Director or his designee terminates the Order after the County has completed all of the requirements of the Order;
  - b. The County petitions the Director or his designee to terminate the Order after it has completed all of the requirements of the Order and the Director or his designee approves the termination of the Order; or
  - c. The Director or Board terminates the Order in his or its sole discretion upon 30 days' written notice to the County.

Termination of this Order, or any obligation imposed in this Order, shall not operate to relieve the County from its obligation to comply with any statute, regulation, permit condition, other order, certificate, certification, standard, or requirement otherwise applicable.

12. Any plans, reports, schedules or specifications attached hereto or submitted by the County and approved by the Department pursuant to this Order are incorporated into this Order. Any non-compliance with such approved documents shall be considered a violation of this Order.
13. The undersigned representative of the County certifies that he or she is a responsible official authorized to enter into the terms and conditions of this Order and to execute and legally bind the County to this document. Any documents to be submitted pursuant to this Order shall also be submitted by a responsible official of the County.
14. This Order constitutes the entire agreement and understanding of the parties concerning settlement of the violations identified in Section C of this Order, and there are no representations, warranties, covenants, terms or conditions agreed upon between the parties other than those expressed in this Order.
15. By its signature below, the County agrees to the issuance of this Order.

And it is so ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2015.

\_\_\_\_\_  
Thomas A. Faha, NRO Regional Director  
Department of Environmental Quality

------(Remainder of Page Intentionally Blank)-----

Stafford County Board of Supervisors voluntarily agrees to the issuance of this Order.

Date: \_\_\_\_\_ By: \_\_\_\_\_, \_\_\_\_\_  
(Person) (Title)

Stafford County Board of Supervisors

Commonwealth of Virginia

City/County of \_\_\_\_\_

The foregoing document was signed and acknowledged before me this \_\_\_\_\_ day of

\_\_\_\_\_, 2015, by \_\_\_\_\_ who is

\_\_\_\_\_ of Stafford County Board of Supervisors, on behalf of the  
County.

\_\_\_\_\_  
Notary Public

\_\_\_\_\_  
Registration No.

My commission expires: \_\_\_\_\_

Notary seal:

**APPENDIX A**  
**SCHEDULE OF COMPLIANCE**

**A. Corrective Action:**

No later than 30 days from the execution of this Order the County shall submit an a plan and schedule for the replacement of the manhole just upstream from the blockage causing the November 2014 SSO along with the adjacent sewer lines within the Woodstream Sanitary Sewer Easement Area and TV the lines upstream outside the November 2014 SSO incident area.

**B. Submissions:**

Unless otherwise specified in this Order, the County shall submit all requirements of Appendix A of this Order to:

Enforcement  
Virginia Department of Environmental Quality  
Northern Regional Office  
13901 Crown Court  
Woodbridge, VA 22193

PROPOSED

BOARD OF SUPERVISORS  
COUNTY OF STAFFORD  
STAFFORD, VIRGINIA

RESOLUTION

At a regular meeting of the Stafford County Board of Supervisors (the Board) held in the Board Chambers, George L. Gordon, Jr., Government Center, Stafford, Virginia, on the 21<sup>st</sup> day of April, 2015:

MEMBERS:

Gary F. Snellings, Chairman  
Laura A. Sellers, Vice Chairman  
Meg Bohmke  
Jack R. Cavalier  
Paul V. Milde III  
Cord A. Sterling  
Robert "Bob" Thomas, Jr.

VOTE:

On motion of , seconded by , which carried by a vote of , the following was adopted:

A RESOLUTION AUTHORIZING THE COUNTY ADMINISTRATOR  
TO EXECUTE A CONSENT ORDER WITH THE VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL QUALITY

WHEREAS, the Virginia Department of Environmental Quality (DEQ) issued a State Water Control Board Enforcement Action-Order by Consent (Consent Order) related to unauthorized discharges of wastewater to State waters that occurred in 2014 due to a broken force main at the Claiborne Run Pump Station, and a blockage in the Sewage Interceptor along Woodstream Boulevard; and

WHEREAS, the Consent Order includes a civil charge of \$36,400, payable to DEQ, as compensation for potential environmental damages incurred as a result of these discharges; and

WHEREAS, per the DEQ enforcement manual, staff requested a 30 per cent reduction of the civil charge to \$24,580, and is awaiting a response from DEQ; and

WHEREAS, the DEQ enforcement manual also allows the applicant to request ninety percent of the funds be used for a Supplemental Environmental Project, such as a direct donation to the Crow's Nest Nature Preserve in Stafford County; and

WHEREAS, the Board believes requesting funds be allocated in this manner would be in the best interest of the County; and

WHEREAS, the Consent Order also requires that the County provide a plan of action to replace a manhole in the Woodstream Boulevard easement, and perform additional investigations upstream for any additional deteriorations that could cause future blockage; and

WHEREAS, the Utilities Department is prepared to comply with the Consent Order and funds are available in the Utilities FY2015 Operations budget to pay the charge and Supplemental Environmental Project;

NOW, THEREFORE, BE IT RESOLVED by the Stafford County Board of Supervisors on this the 21<sup>st</sup> day of April 2015, that the County Administrator be and he hereby is authorized to execute the Consent Order with the Virginia Department of Environmental Quality with an agreement to pay a civil charge and Supplemental Environmental Project costs not to exceed Thirty-six Thousand Four Hundred Dollars (\$36,400).

AJR:MTS:cdg