



APR 14 2006

STATE OF ILLINOIS  
Pollution Control Board

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS**

<b>AMEREN ENERGY</b>	)
<b>GENERATING COMPANY,</b>	)
<b>COFFEEN POWER STATION,</b>	)
	)
<b>Petitioner,</b>	)
	)
<b>v.</b>	)
	)
<b>ILLINOIS ENVIRONMENTAL</b>	)
<b>PROTECTION AGENCY,</b>	)
	)
<b>Respondent.</b>	)

**PCB 2006-64  
(CAAPP Permit Appeal)**

**ADMINISTRATIVE RECORD**

The Respondent, Illinois Environmental Protection Agency ("Illinois EPA"), by and through its attorneys in accordance with the Illinois Pollution Control Board's ("Board") Order of February 16, 2006, files its Administrative Record ("Administrative Record") in this cause.

Acting in accordance with its authority under the CAAPP provisions of the Illinois Environmental Protection Act (hereinafter "Act"), 415 ILCS 5/39.5(2004), the Illinois EPA issued a CAAPP permit to Ameren Energy Resources Generating Company ("Ameren") on September 29, 2005. The permit authorized the operation of an electrical power generation facility known as the Coffeen Power Station. The facility is located at 134 CIPS Lane in Coffeen, Illinois. On November 3, 2005, Petitioner filed a petition before the Board challenging certain permit conditions contained within the Clean Air Act Permit Program ("CAAPP") permit issued by the Illinois EPA.

In accordance with the Board's February 16, 2006, Order, a hard copy of the Administrative Record and four copies of the Administrative Record on compact discs

are filed with the Board. The Administrative Record consists of, among other things, Ameren's permit application materials, various draft permits issued for public comment, correspondence between the Illinois EPA and both Ameren and the United States Environmental Protection Agency, public comments received during the multiple public comment periods, various construction and operating permits issued to Ameren, internal agency memorandums, and miscellaneous general reference materials.

Given the considerable amount of paginated materials and the resources required to provide the Administrative Record to the Board and opposing counsel, the Illinois EPA generally did not copy duplicative materials (e.g., general reference and Electric Energy - AUGI model documents) for each of the twenty-one records for the related CAAPP appeals. As the General Reference Material is applicable to all twenty-two appeals, the Illinois EPA has provided one hard copy of the General Reference Materials and four copies of the General Reference Materials on compact discs with the Board for all the related appeals. These documents are listed at the end of this Administrative Record under the heading "General Materials."

#### **Contents of the Administrative Record**

Miscellaneous documents pertaining to Draft Permit and Public Notice. **[Pages 1-131]**

Preliminary Responsiveness Summary, dated August 15, 2005. **[Pages 132-175]**

Proposed Permit (USEPA Review) Revised Proposed Permit, dated August 2005. **[Pages 176-324]**

Proposed Permit (USEPA Review) Proposed CAAPP Permit, dated October 12, 2003. **[Pages 325-453]**

Extension Denial Letter notifying that the comments must be postmarked by August 1, 2005. **[Page 454]**

Coal-Fired CAAPP Repreproposed Notification. **[Page 455]**

Draft Revised Proposed Permit, dated July 2005. [Pages 456-604]

Coal-Fired Revised Proposed CAAPP Notification. [Page 605]

Revised Proposed CAAPP Permit Draft, dated December 2004. [Pages 606-746]

July 19, 2005, Letter. [Pages 747-752]

August 15, 2005, Letter. [Pages 753-758]

Final Permit and Calculation Sheet, dated September 2005. [Pages 759-913]

September 29, 2005, Letter. [Pages 914-920]

Final Responsiveness Summary. [Pages 921-964]

*In the Matter of Particulate Emission Limitations, Rule 203(g)(1) and 202(b) of Chapter 2, R82-1, June 30, 1988. [Pages 965-1009]*

Letter from J.T. Birkett, Vice President, Central Illinois Public Service Company, to Donald Sutton, Manager, Permit Section, Illinois EPA, providing Title V Operating Permit Application, dated August 31, 1995. [Pages 1010-1300]

135 803 AAA 03 95 09 0009 [Pages 1301-1518]

- \* Application for CAAPP Permit, dated received September 1, 1995. [Pages 1301-1305]
- \* Fee Determination for CAAPP Permit, dated received September 1, 1995. [Pages 1306-1307]
- \* Compliance Certification, dated received September 1, 1995. [Pages 1308-1312]
- \* Delegation of Authority for Responsible Official to a Representative, dated received September 1, 1995. [Pages 1313-1314]
- \* CAAPP Application Completeness Determination and Source Fee Determination, dated September 18, 1995. [Pages 1315-1320]
- \* Cost Estimates for NOx Emissions Reduction for All Coal-Fired Utility Boilers, date updated 3/5/97. [Page 1321]
- \* Letter from Steven C. Whitworth, Supervising Environmental Scientist, to Kevin Fergusson, Illinois EPA, regarding future correspondence, dated April 26, 1999. [Page 1322]

- \* Letter from Thomas E. Siedhoff, Manager, Environmental, Safety and Health, Ameren, to Donald Sutton regarding Title V Permit Fees, dated December 9, 1999, and attachment. **[Pages 1323-1329]**
- \* Letter from Donald Sutton to Michael Menne regarding change of name, dated September 26, 2000. **[Page 1330]**
- \* Power Plant Initiative - February 2003, dated 2/3/03. **[Pages 1331-1332]**
- \* Letter from Michael L. Menne, Vice President, Environmental, Safety and Health, Ameren to Donald Sutton regarding CAAPP Application Forms for 35 IAC Part 217 Subparts V and W, dated May 16, 2003, and attachment. **[Pages 1333-1337]**
- \* Letter from Michael Menne to Donald Sutton regarding Supplement to the Title V Operating Permit Application, dated May 28, 2003, and attachment. **[Pages 1338-1348]**
- \* Memorandum from David Kolaz to Renee Cipriano regarding Approval for Public Hearings for Coal-Fired Power Plant Permits, dated June 2, 2003. **[Pages 1349-1350]**
- \* Email from Steven Whitworth to Manish Patel regarding nominal capacity of plants, dated 6/27/03 4:12 PM. **[Page 1351]**
- \* Email from Jim Ross, Acting Permit Section Manager, Illinois EPA to Stacey Coburn, USEPA, regarding comments on CAAPP permits, dated 7/10/03 9:10 AM. **[Page 1352]**
- \* Information concerning Greenhouse Gases, dated 7/31/03. **[Pages 1353-1354]**
- \* Handwritten notes of Manish Patel regarding Utility CAAPP meeting with Ameren/Dynegy, dated 9/18/03. 10:30 AM. **[Pages 1355-1356]**
- \* Handwritten notes of Laurel Kroack regarding Title V permits, dated November 21, 2003. **[Pages 1357-1358]**
- \* Facsimile from Keith Harley to Julie Armitage, dated November 24, 2003. **[Pages 1359-1364]**
- \* Note and attachment from Chris Romaine to Dave Kolaz, dated 12/10/03. **[Pages 1365-1372]**
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM, with handwritten notes. **[Pages 1373-1374]**

- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM. [**Page 1375**]
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Laurel Kroack. [**Page 1376**]
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Chris Romaine. [**Pages 1377-1383**]
- \* Handwritten notes of Laurel Kroack beginning “Enviros & Title V Power Plants,” dated 2/3/2004. [**Pages 1384-1385**]
- \* Memorandum from Laurel Kroack to Renee Cipriano regarding Title V permits for coal-fired power plants, including Midwest Generation, dated February 4, 2004. [**Pages 1386-1389**]
- \* Email from Chris Romaine to Natalie Locke and Steve Whitworth, dated 2/19/2004, 2:41 PM. [**Page 1390**]
- \* Handwritten notes of Manish Patel regarding meeting with USEPA on coal-fired power plant CAAPPs dated 2/24/04, 1:30 PM. [**Page 1391**]
- \* Handwritten notes of Manish Patel regarding conference call with coal-utility facilities, dated 2/25/04, 1:30 PM. [**Page 1392**]
- \* Memorandum from David Kolaz to Renee Cipriano regarding status and time line for Title V Power Plant Issuance, dated April 28, 2004. [**Pages 1393-1394**]
- \* Handwritten notes of Laurel Kroack regarding meeting with USEPA concerning power plant permits, dated 5/6/04. [**Pages 1395-1397**]
- \* Facsimile from Bill Constantelos to Dave Kolaz, dated May 10, 2004, and attached letter to Renee Cipriano from Fred McCluskey, dated May 10, 2004. [**Pages 1398-1422**]
- \* Memorandum from Laurel Kroack to Cheryl Newton regarding Utility Permit Issuance Timeline, dated June 1, 2004. [**Page 1422**]
- \* Facsimile from Chris Romaine to Stacey Coburn, USEPA, Region V, dated 6/29/04, providing facsimile from Basil Constantelos to Dave Kolaz, dated May 10, 2004, and attachments. [**Pages 1423-1436**]
- \* Facsimile cover sheet from Chris Romaine to Stacey Coburn, dated 6/29/04. [**Pages 1437**]

- \* Email from Chris Romaine to John Cashman, Ross Cooper, Kunj Patel and Manish Patel, dated 7/24/04, 5:08 AM, with handwritten notes from Chris Romaine. **[Page 1438]**
- \* Handwritten notes of Laurel Kroack regarding Title V, dated 8/30/04. **[Pages 1439-1441]**
- \* Letter from Bharat Mathur, Acting Regional Administrator, USEPA, to Renee Cipriano, Illinois EPA, dated December 2, 2004. **[Pages 1442-1444]**
- \* Email from Chris Romaine to Manish Patel regarding Power Plant CAAPP Permits, dated 12/7/2004, 4:14 AM, and handwritten notes of Manish Patel. **[Page 1445]**
- \* Letter from American Bottom Conservancy, et al. to Renee Cipriano regarding procedure to issue Title V permits for coal-fired power plants, dated January 6, 2005. **[Pages 1446-1447]**
- \* Letter from Donald Sutton to American Bottom Conservancy, et al., dated January 13, 2005, responding to letter dated January 6, 2005. **[Pages 1448-1459]**
- \* Letter from Laurel Kroack, Acting Chief, Bureau of Air, Illinois EPA, to Steve Rothblat, USEPA, dated January 18, 2005. **[Pages 1460-1467]**
- \* Handwritten notes of Laurel Kroack regarding utility, title V, dated 1/26/05. **[Pages 1468-1469]**
- \* Notes of Laurel Kroack regarding March 21, 2005, call with feds. **[Pages 1470-1471]**
- \* Notes of Julie Armitage regarding May 10, 2005, meeting with the feds. **[Pages 1472-1477]**
- \* List of Michael Reed, dated June 9, 2005. **[Page 1478]**
- \* Draft Instructions, dated June 23, 2005. **[Pages 1479-1489]**
- \* Note and attachments from Michael Reed to Chris Romaine, dated July 17, 2005. **[Pages 1490-1501]**
- \* Miscellaneous documents regarding request for extension of time to comment on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits. **[Pages 1502-1508]**
- \* Handwritten notes of Michael Reed, dated August 1, 2005. **[Pages 1509-1513]**

- \* Notes of Michael Reed regarding feds conference call, dated September 16, 2005. **[Pages 1514-1515]**
- \* Email exchange between Chris Romaine and Steve Whitworth, dated 9/20/05-9/23/05. **[Pages 1516-1517]**
- \* Handwritten notes of Laurel Kroack, dated September 23, 2005. **[Page 1518]**

Model Permit Developments, Summer 2003. **[Pages 1519-1667]**

Miscellaneous Emails Relevant to Coffeen. **[Pages 1668-1788]**

Miscellaneous Undated Notes of Illinois EPA Staff. **[Pages 1789-1850]**

Miscellaneous Undated Documents Likely Generated by Illinois EPA. **[Pages 1851-1905]**

Miscellaneous Documents Supplied to USEPA. **[Pages 1906-2083]**

Miscellaneous Lists or Drafting Documents. **[Pages 2084-2202]**

Miscellaneous Drafting Documents - Permits. **[Pages 2203-2940]**

Miscellaneous Opacity Documents. **[Pages 2941-3060]**

FESOP NOx Averaging Permits. **[Pages 3061-3064]**

NSPS Worksheet. **[Pages 3065-3066]**

Ameren - Coffeen: Construction Permits & Miscellaneous Operating Permits. **[Pages 3067-3170]**

Documentation Relative to Proceedings Before the Administrator, USEPA. **[Pages 3171-3518]**

Startup, Combustion Evaluation & Alternative Fuel Memorandums **[Pages 3519-3526]**

- \* Memorandum from Michael T. Reed, CAAPP Unit Manager, to Power Plant File regarding Provisions Requiring Detailed Records of Startups After a Certain Timeframe, dated September 23, 2005. **[Pages 3519-3521]**
- \* Memorandum from Michael Reed to Power Plant File regarding Provisions Requiring Combustion Evaluations, dated September 23, 2005. **[Pages 3522-3523]**



- \* Memorandum from Chris Romaine, Manager, Utility Unit to Power Plant File regarding Provisions for Burning Materials Other Than Coal in Power Boilers, dated September 28, 2005. **[Pages 3524-3526]**

Comments Specific to Coffeen **[Page 3527]**

- \* Electronic mail from Steve Whitworth to Brad Frost, Manish Patel and Chris Romaine regarding comments on proposed CAAPP for Coffeen Plant, dated September 26, 2003, 7:27 PM. **[Page 3527]**

Comments Particular to Ameren **[Pages 3528-3558]**

- \* Email from Stacey Coburn, USEPA, to Manish Patel regarding comments on Ameren Title V permits, dated 7/8/03, dated 11:54 AM and handwritten notes of Manish Patel. **[Pages 3528-3531]**
- \* Letter from Michael Menne to Mr. Charles Matoesian/ Mr. Frost, Illinois EPA, providing Comments on proposed CAAPP Permits, dated January 12, 2005, and attachment. **[Pages 3532-3543]**
- \* Letter from David Reiser to Brad Frost and Charles Matoesian regarding Request for Extension of Time for Commenting on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits Posted July 19, 2005, dated July 25, 2005. **[Pages 3544-3545]**
- \* Letter from Charles Matoesian to Steven Whitworth regarding Request for Extension of Time for Commenting on Proposed Title V Permits Posted on July 19, 2005, dated July 28, 2005. **[Page 3546]**
- \* Letter from Steven C. Whitworth, Supervising Environmental Scientist, Environmental, Safety and Health, Ameren, to Charles Matoesian providing Comments on revised proposed CAAPP Permits, dated August 1, 2005, and attachment. **[Pages 3547-3558]**

General Comments **[Pages 3559-4497]**

- \* Comments of the Sierra Club and American Bottom Conservancy, Summer 2003. **[Pages 3559-3597]**
- \* Letter from Matthew J. Dunn, Division Chief, Environmental Enforcement/Asbestos Litigation Division, Illinois Attorney General's Office, to Charles Matoesian regarding Coal Powered Generation Plants Title V Permit Applications, dated September 29, 2003. **[Pages 3598-3612]**

- \* Email from Stacey Coburn to Chris Romaine regarding Enhanced coal-fired boiler CAAPP permits, dated April 12, 2004, 4:53 PM, and handwritten notes of Manish Patel. **[Pages 3613-3615]**
- \* Email from Verna Owen to Mr. Holmstead, dated 12/14/2004 12:09:23 PM. **[Pages 3616-3617]**
- \* Letter from Paula Becker Wheeler, Assistant Attorney General, Illinois Attorney General's Office, to Charles Matoesian providing comments to Revised Proposed CAAPP Permits for 22 Coal-Fired Power Plants, dated January 14, 2005, and attachments. **[Pages 3618-4003]**
- \* Letter from Keith Harley, Attorney at Law, Chicago Legal Clinic, Inc., to Charles Matoesian regarding Revised Proposed CAAPP Permits for Coal-Fired Power Plants, dated January 14, 2005, and attachments. **[Pages 4004-4389]**
- \* Letter from Ann Alexander, Environmental Counsel to Attorney General Lisa Madigan, to Charles Matoesian regarding Comments on draft revised proposed CAAPP permits, dated August 1, 2005, and attachments. **[Pages 4390-4497]**

Proceedings in the US District Court. **[Pages 4498-4539]**

Title I/ Title V MOU **[Pages 4540-4545]**

November 12, 1981 USEPA Directive **[Pages 4546-4550]**

HPV Matrix Criteria Opacity **[Pages 4551-4561]**

White Paper **[Pages 4562-4596]**

White Paper 2 **[Pages 4597-4649]**

Guidance: Statement of Basis **[Pages 4650-4652]**

Design of Flexible Air Permits **[Pages 4653-4707]**

September 28, 1982 Bennett Memorandum **[Pages 4708-4710]**

February 15, 1983 Bennett Memorandum **[Pages 4711-4715]**

Limiting PTE in New Source Permitting, June 13, 1989 **[Pages 4716-4727]**

Startup, Shutdown Guidance: January 28, 1993 **[Pages 4728-4730]**

January 15, 1997, Title V Guidance **[Pages 4731-4737]**

USEPA Guidance Directed to Ohio EPA [**Pages 4738-4741**]

January 21, 1998 Fuel Flexibility Guidance [**Pages 4742-4752**]

August 11, 1999 (September 20, 1999) Herman Memorandum [**Pages 4753-4773**]

December 5, 2001, Schaeffer Memorandum [**Pages 4774-4775**]

Miscellaneous Reference Material [**Pages 4776-4777**]

Fort James Camas Mill Petition [**Pages 4778-4820**]

### **General Materials**

Electric Energy - AUGI Model Documents: [**Pages 1-2536**]

Early Discussions with AUGI on Fugitives [**Page 1**]

Model Permit Development Early Discussions with AUGI [**Pages 2-12**]

Early Discussion with AUGI Effect of Flow Rater (Load) on ESP Performance [**Pages 13-14**]

EEI - June 25, 1997 [**Pages 15-65**]

EEI - August 13, 1997 [**Pages 66-80**]

EEI - August 14, 1997 [**Pages 81-82**]

EEI- August 20, 1997 [**Pages 83-91**]

EEI - September 9, 1997 [**Pages 92-98**]

EEI - October 1997, Cover Letter and Preliminary Draft Permit [**Pages 99-160**]

EEI - October 27, 1997 [**Pages 161-162**]

EEI - December 8, 1997 [**Pages 163-165**]

EEI - December 12, 1997 [**Pages 166-176**]

EEI - December 17, 1997 [**Pages 177-263**]

EEI - December 25, 1997 [**Pages 264-321**]

Late 1997 - Early 1998 Internal Drafting [**Pages 322-378**]

EEI - January 9, 1998 [**Pages 379-444**]

EEI - February 4, 1998 [**Pages 445-452**]

EEI - February 16, 1998 [**Pages 453-512**]

EEI - February 23, 1998 [**Pages 513-521**]

EEI - February 24, 1998 [**Pages 522-524**]

EEI - February 26, 1998 [**Pages 525-527**]

EEI - February 27, 1998 [**Pages 528-546**]

EEI - March 1998 [**Pages 547-566**]

EEI - April 1998 [**Pages 567-580**]

EEI - Sharing with USEPA 1998 [**Pages 581-612**]

EEI - May 4, 1998 [**Pages 613-670**]

EEI - June 26, 1998 [**Pages 671-677**]

EEI - July 5, 1998 [**Pages 678-716**]

EEI - August 4, 1998 [**Pages 717-773**]

EEI - September 30, 1998 [**Pages 774-829**]

USEPA Comments September 1998 [**Pages 830-851**]

EEI - December 28, 1998 [**Pages 852-859**]

EEI - May 11, 1999 [**Pages 860-871**]

EEI - May 12, 1999, Draft to Notice? [**Pages 872-966**]

EEI - May 12, 1999 [**Pages 967-972**]

EEI - May 14, 1999 [**Pages 973-1047**]

EEI - May 20, 1999 [**Page 1048**]

EEI - August 4, 1999 [**Pages 1049-1052**]

AUGI Comments Summer 1999 [Pages 1053-1067]

EEI - March 17, 2002 [Pages 1068-1139]

EEI - May 10, 2002 [Page 1140]

EEI - July 2002 [Pages 1141-1225]

EEI - August 2002 [Page 1226]

EEI - September 2002 [Pages 1227-1410]

EEI - Draft to Notice September 2002 [Pages 1411-1505]

EEI - Public Comments October 2002 [Pages 1506-1514]

EEI - Exchange with USEPA November 2002 [Pages 1515-1519]

EEI - December 6, 2002 [Pages 1520-1521]

EEI - March 11 and 12, 2003 [Pages 1522-1524]

EEI - April 2003 [Pages 1525-1631]

EEI Tracked Changes for Preparation of October 2003 Proposed Permit [Pages 1632-1683]

EEI - Miscellaneous Emails [Pages 1684-2514]

AUGI Miscellaneous Notes [Pages 2515-2536]

#### Emails

General Emails, 2002 [Pages 2537-2567]

General Emails, 2003 [Pages 2568-3807]

General Emails, January 2004 - May 31, 2004 [Pages 3808-4739]

General Emails, June 1, 2004 - December 31, 2004 [Pages 4740-5906]

General Emails, 2005 [Pages 5907-7131]

Miscellaneous Reference Documents:

Miscellaneous Cases Before the Administrator - USEPA [Pages 7132-7483]

Compliance Assurance Monitoring Rule [Pages 7484-7597]

Good Engineering Practices [Page 7598]

Electrostatic Precipitators [Pages 7599-7644]

Environmental Justice [Pages 7645-7649]

Information on Existing Plants [Pages 7650-7660]

Monitoring [Page 7661]

Periodic Monitoring Guidance [Pages 7662-7694]

Background Information on NSR Enforcement [Pages 7695-7876]

Public Hearing Reference Document/Folder [Pages 7877-8157]

Miscellaneous Opacity Reports [Pages 8158-9038]

- \* CWLP [Pages 8158-8181]
- \* Dynegy [Pages 8182-8202]
- \* Electric [Pages 8203-8248]
- \* Miscellaneous [Pages 8249-8255]
- \* Ameren [Pages 8256-8593]
- \* Midwest Generation [Pages 8594-8778]
- \* Midwest Generation - Old [Pages 8779-9038]

Collins Opacity Report [Pages 9039-9113]

Miscellaneous Documents from Florida [Pages 9114-9135]

Miscellaneous Documents from Georgia [Pages 9136-9176]

Miscellaneous Documents from Indiana [Pages 9177-9183]

Miscellaneous Documents from Iowa [Pages 9184-9228]

Miscellaneous Documents from Kentucky [Pages 9229-9263]

Miscellaneous Documents from Michigan [Pages 9264-9298]

Miscellaneous Documents from Ohio [Pages 9299-9365]

Miscellaneous Documents from Utah [Pages 9366-9482]

Supersession and Credible Evidence Guidance [Pages 9483-9486]

Draft Title V Permit Review Guidelines [Pages 9487-9620]

Respectfully submitted by,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,

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Sally A. Carter  
Assistant Counsel

Illinois Environmental Protection Agency  
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Springfield, Illinois 62794-9276  
(217)782-5544

**CERTIFICATE OF SERVICE**

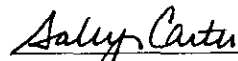
I hereby certify that on the 13<sup>th</sup> day of April 2006, I did send, via CMS Courier,  
the following instrument entitled **ADMINISTRATIVE RECORD** to:

Dorothy Gunn, Clerk  
Illinois Pollution Control Board  
100 West Randolph Street  
Suite 11-500  
Chicago, Illinois 60601

I further hereby certify that on the 12<sup>th</sup> day of April 2006, I did send, a true and correct copy of the same foregoing instrument, by First Class Mail with postage thereon fully paid and deposited into the possession of the United States Postal Service, to:

Bradley P. Halloran  
Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center  
Suite 11-500  
100 West Randolph Street  
Chicago, Illinois 60601

James T. Harrington  
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Sally Carter  
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