BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

IN THE MATTER OF:	)	
	)	
CITGO PETROLEUM CORPORATION and PDV MIDWEST REFINING, L.L.C.,	)	
	)	PCB 12-94
Petitioners,	)	(Variance - Water)
	)	
v.	)	
	)	
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,	)	
	)	
Respondent.	)	

NOTICE OF FILING

To:

John Therriault, Assistant Clerk Bradley P. Halloran, Hearing Officer Illinois Pollution Control Board 100 West Randolph, Suite 11-500 Chicago, IL 60601	Stephanie Diers and Sara G. Terranova, Assistant Counsel Office of Chief Legal Counsel Illinois Environmental Protection Agency 1021 N. Grand Avenue East, P.O. Box 19274 Springfield, IL 62794-9274
John J. Kim, Interim Director Illinois Environmental Protection Agency 1021 N. Grand Avenue East P.O. Box 19274 Springfield, IL 62794-9274	

Please take notice that on April 3, 2012, we filed electronically with the Office of the Clerk of the Illinois Pollution Control Board the attached **Petitioners' Response to Hearing Officer Order**, a copy of which is served upon you.

CITGO PETROLEUM CORPORATION and
PDV MIDWEST REFINING, L.L.C.

By: _____
One of Its Attorneys

Jeffrey C. Fort
SNR Denton US LLP
233 S. Wacker Drive, Suite 7800
Chicago, IL 60606-6404

BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

CITGO PETROLEUM CORPORATION and PDV MIDWEST REFINING, L.L.C.,	)	
Petitioners,	)	PCB 12-94 (Variance - Water)
v.	)	
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,	)	
Respondent.	)	

PETITIONERS' RESPONSE TO HEARING OFFICER ORDER

In response to the Hearing Officer Order dated March 5, 2012, the Petitioners', through their counsel, SNR Denton US LLP, state as follows:

Question:

1. The petitioners request a variance extension from Sections 302.208(g) and 302.407 (35 Ill. Adm. Code 302.208(g), 302.407) for Total Dissolved Solids (TDS). Petition (Pet.) at 4. However, as the petitioners (Pet. at 3) and the Agency (Rec. at 6) note, the Board has eliminated the water quality standard for TDS in general use waters. *See* Triennial Review of Sulfate and Total Dissolved Solids Water Quality Standards, R07-9 (Sept. 4, 2008). Please confirm whether the reference to Section 302.208(g) in the proposed variance extension language should be removed. *See* 35 Ill. Adm. Code 104.204(a).

Response:

Correct. 35 Ill. Adm. Code Section 302.208(g) is not relevant to this matter and the reference should be removed.

Question:

2. CITGO states that it has "collected the data as required by Paragraphs 3, 4, and 5 of the Order in PCB 08-33" and attached the resulting information as Exhibit (Exh.) B to the petition. Pet. at 7. It appears, however, that the data collected pursuant to paragraph 5 of the PCB 08-33 order (monitoring TDS in the effluent of Outfall 001) has not been provided. Please submit the data. *See* 35 Ill. Adm. Code 104.210(d)(1), (2).

Response:

CITGO has collected the data from monitoring TDS in its intake and the effluent of Outfall 001 and has been providing the data to the Agency with and in addition to its Discharge Monitoring Reports under its NPDES permit. Exhibit B contains the intake data, in tabular form. The effluent TDS data (which have been submitted to the Agency) are summarized and submitted in tabular form with this Response as Exhibit I.

Question:

3. Please explain whether the addition of 4,000,000 gallons of tankage (Pet. at 10) satisfies any of the compliance plan conditions of the PCB 08-33 order. *See* 35 III. Adm. Code 104.210(d)(1), (2).

Response:

The 4,000,000 gallons of tankage was not intended to be part of the compliance plan under PCB 08-33. This tankage was present at the refinery; it was decided that using this tankage for pre-treatment before the wastewater treatment plant would improve the performance of the waste water plant and enhance consistent nitrification, meeting the requirement imposed by the Board in AS 08-08. Condition (g) of the Order in that proceeding stated: "The Refinery must continue its efforts to control and manage solids from its crude oil supply with respect to its wastewater treatment system." *See* Order in AS 08-08, entered December 18, 2008. This tankage effectively functions as an solids/water separator, and not as a containment device. These tanks are generally operated in a full mode and are a key element of the wastewater treatment system to meet ammonia nitrogen discharge requirements. Because the tanks are operated full to maximize solids separation, there is no capacity for holding additional flow during periods of elevated TDS in the Ship Canal.

Question:

4. In PCB 08-33, the Board granted CITGO's motion to incorporate the record of PCB 05-85 into the PCB 08-33 record. *See* CITGO Petroleum Corporation and PDV Midwest Refining, L.L.C. v. IEPA, PCB 08-33, slip op. at 4 (May 15, 2008). Please address whether all or any part of the PCB 08-33 record should be incorporated into the PCB 12-94 record. *See* 35 Ill. Adm. Code 104.210(d)(3).

Response:

We do not believe it necessary to include the record from the prior variance, PCB 08-33, or from PCB 05-85. To the extent there is relevant information from either of these proceedings, it has been incorporated in the Petition here or its Exhibits.

Question:

5. The petition refers to CITGO having added "4,000,000 gallons of tankage to enhance solids removal as a pre-treatment measure before the water treatment plan . ." Pet. at 10. The sentence seems incomplete. Please provide the intended language and indicate the year in which the 4,000,000 gallons of tankage was added. *See* 35 Ill. Adm. Code 104.204(b)(7).

Response:

There is a typo which causes the confusion. Paragraph 10 should have concluded with "before the water treatment plant." (added language underlined).

Question:

6. Please explain whether the 4,000,000 gallons of tankage could provide storage capacity to isolate the wet gas scrubber discharge during periods of elevated TDS levels in the receiving stream. *See* 35 Ill. Adm. Code 104.204(b)(7). For context, James Huff testified as follows in the PCB 05-85 proceeding: "[T]hese [TDS water quality] violations appear to occur over 15 consecutive days, but less than 22 days. The Lemont Refinery will have to come up with in excess of 4,000,000 gallons of capacity to isolate the wet gas scrubber during these periods of elevated TDS levels at the 1-55 Bridge." CITGO, PCB 08-33, slip op. at 20.

Response:

As noted in response to Question 3, this tankage is used for another purpose - to meet the pre-treatment requirements in the Order in AS 08-08 and support nitrification treatment by the wastewater treatment plant of the Lemont Refinery. The tankage calculated by Mr. Huff was the size needed simply to deal with the "mixture rule" during times of elevated TDS in the Ship Canal upstream of the refinery. It was not intended to provide any removal or treatment of TDS. The upstream concentrations of TDS [and chlorides] is the cause of this variance; without the elevated TDS levels during snow melt run off conditions, the Ship Canal meets the existing TDS standard. Except during periods of snow melt run-off, there is no prohibition on the TDS discharges from the refinery with or without the wet gas scrubber. Dedicating the amount of tankage for an occasional spike in upstream TDS conditions in the Ship Canal is, as the Board has previously found, an arbitrary and unreasonable hardship. (The Refinery further notes that there were no violations of the TDS standard in the Ship Canal during the winter season just concluded on April 1, 2012. This is further justification for the use of a flexible management tool such as a BMP rather than requiring the installation of substantial capital equipment for a transitory event due to upstream conditions).

Question:

7. In PCB 08-33, CITGO used the "projected discharge loadings" to calculate the incremental increase in TDS water quality, and estimated that the wet gas

scrubber would add 304,000 [sic][1] pounds per day of TDS to the Lemont Refinery's wastewater discharge. Pet., Exh. A at 8. In the instant petition, CITGO uses "actual discharge loadings" to calculate the incremental increases. Pet. at 11-12. Please provide information on the actual TDS discharge loadings and concentrations. *See* 35 Ill. Adm. Code 104.204(b)(8).

Response:

Exhibit J to this Response is an updated Table prepared by Mr. James Huff. It shows the low flow conditions in the Ship Canal both at the Lemont Refinery and at the I-55 Bridge, the mean refinery flow and mass of TDS discharged, and the relative concentrations of TDS at the Refinery discharge, at the edge of the mixing zone and at the I-55 Bridge. This table shows the very minor contribution of the Refinery to the TDS levels in the Ship Canal.

This table also shows that the quantity of TDS now being discharged due to the Wet Gas Scrubber is about half of what was predicted when the initial variance in this matter was submitted: the initial design average projected 215,000 pounds per day increase from the Wet Gas Scrubber while the actual incremental loading from the Wet Gas Scrubber is 94,500 pounds per day. (we acknowledge that in 2008 there was a concern that the incremental TDS loading from the wet gas scrubber could reach a peak of 304,000 pounds per day)

Question:

8. In pre-filed testimony for Water Quality Standards and Effluent Limitations for the Chicago Area Waterway System and the Lower Des Plaines River: Proposed Amendments to 35 Ill. Adm. Code 301, 302, 303 and 304, R08-9(C), Mr. Huff stated that "[w]hen de-icing salts cause a spike in the chloride level, the Lemont Refinery loses its mixing zone for chlorides (and sulfates), as the Lower Ship Canal's upstream water quality exceeds the water quality standard for chlorides." Pet., Exh. G at 5; *see also id.* at 7 ("Section 302.102(b)(9) prohibits mixing zones for constituents where the water quality standard is already violated in the receiving stream."). Please comment on whether Mr. Huff's statement would also apply with respect to TDS and, if so, whether the statement constitutes a reason for the instant variance request. *See* 35 Ill. Adm. Code104.204(c).

Response:

Yes, Mr. Huff's statement would also apply to TDS, and yes, it also constitutes a reason for this variance request.

[1] The reference to 304,000 pounds per day cited here iwas the expected daily maximum as the wet gas scrubber was being constructed in 2008. The original daily average quantity was215,000 pounds of TDS. *See* Response to Questions 7 and 10 and Exhibit J.

Question:

9. CITGO states that it has "collected influent data relating to chlorides upstream of the Refinery; that data is included in Exhibit C." Pet. at 7. The Agency recommends that, as a compliance plan condition, CITGO "provide chloride data for their effluent to ensure that any future chloride water standard can be met." Rec. at 6. Please comment on CITGO's ability to provide such data from the past and CITGO's position on including such a condition. If CITGO does not oppose such a condition, please consider proposing language for the condition. *See* 35 Ill. Adm. Code104.204(c).

Response:

Chlorides in the effluent have been collected since July, 2011; the data are included in Exhibit K. The Lemont Refinery is willing to report its effluent chloride levels, but notes that the Board has not proposed to adopt such a water quality standard for the Ship Canal. CITGO believes that dischargers to the Sanitary and Ship Canal are likely to be significantly impacted by such a standard for chlorides, unless the Board also adopts a practical compliance tool such as a BMP requirement [which is part of the recommended conditions here]. We would suggest that paragraphs 3 and 4 of the proposed variance conditions add chlorides to TDS as the parameters to be monitored and reported. The language in Paragraphs 3 and 4, with respect to monitoring and reporting, could simply state "TDS and chlorides" where the existing language refers only to TDS sampling and reporting.

Question:

10. CITGO represents that the Lemont Refinery's average daily production is 168,626 barrels. Pet. at 8; *see also* CITGO, PCB 08-33, slip op. at 7 ("Currently, the Lemont Refinery produces 168,626 barrels daily on average"); Pet. at 14 ("design average permitted discharge is 5.79 MGD"). None of the proposed variance conditions would require CITGO to re-evaluate its impact on TDS levels in the receiving stream if CITGO increased production above this average. If CITGO does not oppose such a condition, please consider proposing language for a condition that would require CITGO to reevaluate its impact on the receiving stream in that event. *See* 35 Ill. Adm. Code 104.204(j).

Response:

CITGO would object to such a condition if expressed in the manner as suggested. However, the Lemont Refinery would be amenable to a condition that was based on the quantity of TDS which was projected to be discharged. In the initial variance, an average 215,000 pounds per day of TDS was projected to be added from the installation of the Wet Gas Scrubber. In the 2008 variance, there was a concern that the incremental daily maximum could be even higher. In actual practice, the amount of incremental TDS from the Wet Gas Scrubber averages 94,450 pounds per day. Clearly the projected impact was greater than the actual impact, which is due in part to the efficient operations of the refinery and the wet gas scrubber.

Therefore, Petitioners would be amenable to a condition such as the following:

> "11. Petitioners shall assess, on an annual basis, the quantity of TDS incrementally being added due to the Wet Gas Scrubber. If the amount of incremental TDS exceeds, or threatens to exceed, 215,000 pounds as a daily average on an annual basis, then Petitioners shall either reduce its incremental TDS discharge to below 215,000 pounds on a daily average or submit a request for another variance with appropriate conditions."

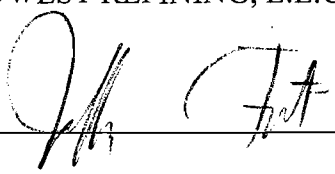
This condition should provide an appropriate balance between increasing productivity at the Lemont Refinery while not unduly increasing the TDS loading from the level the Board has already approved.

Conclusion

The Lemont Refinery respectfully submits this information for the Board's consideration and in response to the Hearing Officer Order dated March 5, 2012 in this proceeding. The Lemont Refinery believes that this information is further support for the Board to grant the Variance as requested herein.

Respectfully submitted,

CITGO PETROLEUM CORPORATION and
PDV MIDWEST REFINING, L.L.C, Petitioners.

By: 

Dated: April 3, 2012

Jeffrey C. Fort
SNR Denton US LLP
233 S. Wacker Drive
Suite 7800
Chicago, IL 60606-6404

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that I have served upon the individuals named on the attached Notice of Filing true and correct copies of the enclosed **Petitioners' Response to Hearing Officer Order** by First Class Mail, postage prepaid, on April 3, 2012.

EXHIBIT I

CITGO LEMONT REFINERY
EFFLUENT TOTAL DISSOLVED SOLIDS DISCHARGED THROUGH OUTFALL 001, mg/L

2007		2008		2009		2010	
Date	TDS-Effluent	Date	TDS-Effluent	Date	TDS-Effluent	Date	TDS-Effluent
04/03/07	1670	01/01/08	3780	01/01/09	4491	01/05/10	5134
04/05/07	1779	01/03/08	6210	01/06/09	4205	01/07/10	5017
04/10/07	1586	01/08/08	5263	01/08/09	4415	01/12/10	5308
04/12/07	1593	01/10/08	4810	01/13/09	4889	01/14/10	5807
04/17/07	1441	01/15/08	4898	01/15/09	5211	01/19/10	5168
04/19/07	1584	01/17/08	5088	01/20/09	5595	01/21/10	4853
04/19/07	1584	01/22/08	5431	01/22/09	5700	01/26/10	4565
04/19/07	1584	01/24/08	5395	01/27/09	6335	01/28/10	4223
04/24/07	2097	01/29/08	5889	01/29/09	5353	02/02/10	4134
04/26/07	1542	01/31/08	5349	02/03/09	6567	02/04/10	4171
05/01/07	1523	02/05/08	5544	02/05/09	6090	02/09/10	4637
05/03/07	1627	02/07/08	5852	02/10/09	5790	02/11/10	4756
05/08/07	1801	02/12/08	6025	02/12/09	5036	02/16/10	5231
05/10/07	1879	02/14/08	5775	02/17/09	5322	02/18/10	5441
05/15/07	2083	02/19/08	4864	02/19/09	5287	02/23/10	5040
05/17/07	1691	02/21/08	4578	02/24/09	5887	02/25/10	5073
05/22/07	2345	02/26/08	4973	02/26/09	5689	03/02/10	4080
05/24/07	2274	02/28/08	4817	03/03/09	4632	03/04/10	4638
05/29/07	2054	03/04/08	5508	03/05/09	4749	03/09/10	4706
05/31/07	1978	03/06/08	4984	03/10/09	3578	03/11/10	4596
06/05/07	1751	03/11/08	4872	03/12/09	3256	03/16/10	4014
06/07/07	1919	03/11/08	4872	03/17/09	2919	03/18/10	3951
06/12/07	1921	03/13/08	4569	03/19/09	3526	03/23/10	4669
06/14/07	1939	03/18/08	4638	03/24/09	5182	03/25/10	4694
06/19/07	1931	03/20/08	4734	03/26/09	5653	03/30/10	5952
06/21/07	1924	03/25/08	4888	03/31/09	5583	04/01/10	5577
06/26/07	1694	03/27/08	5102	04/02/09	4825	04/06/10	4369
06/28/07	1649	04/01/08	5117	04/07/09	4333	04/08/10	3707
07/02/07	1646	04/03/08	5174	04/09/09	4201	04/13/10	3883
07/05/07	1643	04/08/08	5270	04/14/09	4827	04/15/10	4052
07/12/07	1374	04/10/08	4826	04/16/09	4506	04/20/10	5633
07/13/07	1375	04/15/08	3856	04/21/09	5340	04/22/10	5886
07/17/07	1395	04/17/08	4437	04/23/09	5271	04/27/10	5718
07/19/07	1392	04/22/08	5305	04/28/09	5299	04/29/10	6283
07/24/07	1154	04/24/08	6165	04/30/09	4881	05/04/10	5457
07/26/07	1152	04/29/08	6160	05/05/09	4925	05/06/10	5043
07/31/07	1358	05/01/08	7248	05/07/09	5246	05/11/10	4491
08/02/07	1439	05/06/08	5849	05/12/09	5663	05/13/10	4222
08/07/07	1331	05/08/08	5722	05/14/09	5031	05/18/10	4383
08/09/07	1354	05/13/08	5052	05/19/09	4030	05/20/10	5029
08/14/07	1354	05/15/08	4510	05/21/09	4138	05/25/10	4558
08/16/07	1401	05/20/08	4921	05/26/09	5554	05/27/10	4503
08/21/07	1324	05/22/08	5214	05/28/09	4332	06/01/10	5305
08/23/07	1228	05/27/08	5394	06/02/09	3292	06/03/10	4344
08/28/07	760	05/29/08	5812	06/04/09	4594	06/08/10	4931
08/30/07	912	06/03/08	5593	06/09/09	6137	06/10/10	5450
09/04/07	1057	06/05/08	5232	06/11/09	5680	06/15/10	6577
09/06/07	1242	06/10/08	4492	06/16/09	4756	06/17/10	6309
09/11/07	1345	06/12/08	4056	06/18/09	3685	06/22/10	4532
09/13/07	1509	06/17/08	3989	06/23/09	3474	06/24/10	4215
09/18/07	1668	06/19/08	4434	06/25/09	3821	06/29/10	3589
09/20/07	1751	06/24/08	5480	06/30/09	4358	07/01/10	4303
09/25/07	1694	06/26/08	5297	07/02/09	4658	07/06/10	4888
09/29/07	1647	07/01/08	5674	07/07/09	4986	07/08/10	3210
10/02/07	1763	07/03/08	5574	07/09/09	5234	07/13/10	1822
10/04/07	1902	07/08/08	5806	07/14/09	4757	07/15/10	1781
10/09/07	1973	07/10/08	6135	07/16/09	4734	07/20/10	4108
10/11/07	1831	07/15/08	4736	07/21/09	4758	07/22/10	4381
10/16/07	1881	07/17/08	5290	07/23/09	5204	07/27/10	4065
10/18/07	1867	07/22/08	4941	07/28/09	5031	07/29/10	3595
10/23/07	2875	07/24/08	5005	07/30/09	5193	08/03/10	3252
10/25/07	4006	07/29/08	5164	08/05/09	5282	08/05/10	3056
10/30/07	4540	07/31/08	5261	08/06/09	5580	08/10/10	3311

CITGO LEMONT REFINERY

EFFLUENT TOTAL DISSOLVED SOLIDS DISCHARGED THROUGH OUTFALL 001, mg/L

2007		2008		2009		2010	
11/01/07	5058	08/05/08	2221	08/11/09	5536	08/12/10	3878
11/06/07	4782	08/07/08	1894	08/13/09	5734	08/17/10	4533
11/08/07	5248	08/12/08	1610	08/18/09	4968	08/19/10	4588
11/08/07	5248	08/14/08	1554	08/20/09	5386	08/24/10	3944
11/13/07	5476	08/19/08	1618	08/25/09	4943	08/26/10	4363
11/15/07	5516	08/21/08	1669	08/27/09	5189	08/31/10	5066
11/20/07	6007	08/26/08	1455	09/01/09	3662	09/02/10	4534
11/22/07	5565	08/28/08	3331	09/03/09	3957	09/04/10	4533
11/27/07	5445	09/02/08	5422	09/08/09	5000	09/07/10	4534
12/01/07	5266	09/04/08	5407	09/10/09	5336	09/09/10	3276
12/01/07	5266	09/09/08	3708	09/15/09	5097	09/14/10	2173
12/04/07	6394	09/11/08	4024	09/17/09	4981	09/16/10	2131
12/06/07	6267	09/16/08	2504	09/22/09	4894	09/21/10	2107
12/11/07	6146	09/18/08	3042	09/24/09	5337	09/23/10	2051
12/13/07	6142	09/23/08	3802	09/29/09	5981	09/28/10	2038
12/18/07	5930	09/25/08	4178	10/01/09	6301	09/30/10	1778
12/20/07	6071	09/30/08	5542	10/06/09	5707		
12/25/07	6027	10/02/08	5987	10/08/09	5368		
12/27/07	6340	10/04/08	5542	10/13/09	6200		
		10/07/08	5987	10/15/09	5559		
		10/09/08	5353	10/20/09	5244		
		10/14/08	5775	10/22/09	5561		
		10/16/08	5826	10/27/09	2959		
		10/21/08	6610	10/29/09	3247		
		10/23/08	6397	11/03/09	3804		
		10/28/08	5100	11/05/09	3869		
		10/30/08	6070	11/10/09	5627		
		11/4/08	6773	11/12/09	5709		
		11/6/08	6098	11/17/09	6061		
		11/7/08	6131	11/19/09	5771		
		11/11/08	6098	11/24/09	6405		
		11/13/08	6066	11/26/09	5629		
		11/18/08	6557	12/01/09	6484		
		11/20/08	7035	12/01/09	6484		
		11/24/08	6307	12/03/09	5864		
		11/20/08	7035	12/08/09	5420		
		11/24/08	6307	12/10/09	5679		
		11/25/08	6039	12/15/09	5637		
		12/2/08	5314	12/17/09	6594		
		12/4/08	5374	12/20/09	5705		
		12/9/08	5386	12/22/09	5615		
		12/11/08	5149	12/29/09	4102		
		12/16/08	5454	12/30/09	4131		
		12/18/08	5351				
		12/23/08	6282				
		12/25/08	6108				
		12/30/08	4103				
Average	**2644**		**5068**		**5050**		**4370**

4829

EXHIBIT J

CITGO'S IMPACT ON THE CHICAGO SANITARY & SHIP CANAL
TDS AND SULFATE

		Mixing Zone
7Q10 flow in Ship Canal	850 mgd a/	
7Q10 at I-55 bridge	970 mgd	
Mean TDS in effluent	4,829 mg/L b/	
Mean SO4 in effluent	3,442 mg/L c/	
Mean Refinery Flow, 2008-2010	4.98 MGD	
lbs TDS discharged	200,550 lbs/day	
lbs of SO4 discharged	142,957 lbs/day	
Increase in Ship Canal conc, TDS	28 mg/L	113
Increase in Ship Canal conc. SO4	20 mg/L	81
Increase at I-55 Bridge, TDS	25 mg/L	
Increase at I-55 Bridge, SO4	18 mg/L	

a/ From H&H Feb 2008 Environmental Assessment & Effluent Limit Derivation Report (NH3)
b/ Effluent data 2008 thur 2010
c/ Effluent data 1/2009 to 9/2010

Wet Gas Scrubber design called for 215,000 pounds per day TDS **incremental increase.**
2007 annual Average Flow was 4.81 MGD
TDS pre-Wet Gas Scrubber in Refinery outfall averaged 2,644 mg/L or 106,065 pounds per day
TDS post-Wet Gas Scrubber in Refinery outfall averaged 4,829 mg/L or 200,515 pounds per day
So Wet Gas Scrubber incremental loading has been on the order of **94,450** pounds per day,.
versus **215,000** pounds per day estimated in Variance Petition

EXHIBIT K

CITGO PETROLUEM CORPORATION
CHLORIDE AND TDS DATA
PLANT OUTFALL

Date	Chloride, mg/L
07/25/11	130
08/01/11	540
08/08/11	640
08/17/11	680
08/22/11	660
08/29/11	580
09/06/11	630
09/12/11	610
09/19/11	650
09/26/11	680
10/03/11	750
01/09/12	690
01/16/12	870
01/23/12	950
01/30/12	910
02/06/12	1,000
02/13/12	1,000
02/20/12	960
02/27/12	950