



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Solid Waste Management
COLUMBIA ENVIRONMENTAL FIELD OFFICE
1421 Hampshire Pike
Columbia, Tennessee 38401
Phone (931) 380-3371 Statewide 1-888-891-8332 Fax (931) 380-3397

June 25, 2018

Mayor Keith Durham
City of Lawrenceburg
233 West Gaines Street, NBU 4
Lawrenceburg, TN 38464

CERTIFIED MAIL
91 7199 9991 7038 6369 4132
RETURN RECEIPT REQUESTED

Gary Wayne Hyde
Solid Waste Director
2126 Baler Drive
Lawrenceburg, TN 38464

CERTIFIED MAIL
91 7199 9991 7038 6369 4149
RETURN RECEIPT REQUESTED

**RE: COMPLAINT INSPECTION
NOTICE OF VIOLATION
LAWRENCEBURG DEMOLITION LANDFILL
DML 50-0024**

Dear Mayor Durham and Mr. Hyde:

On June 6, 2018 the Division of Solid Waste Management (Division) conducted a complaint inspection at the referenced facility. The complainant stated that septic sludge from a private septic pumping company had disposed of septic sludge from two trucks on the Class III Landfill. The inspection was conducted to evaluate compliance with the *Tennessee Solid Waste Disposal Act*, Tennessee Code Annotated § 68-211-101 *et seq.* and with Tennessee's Solid Waste Regulations (Division Rule Chapter 0400-11-01) promulgated pursuant to that Act, and compliance with the Facility-Specific Permit Conditions.

During the inspection, violations of Tennessee's solid waste management regulations were identified. The attached Inspection Report/Notice of Violation (NOV) details the observations made by Division personnel during the inspection of your facility.

The Division appreciates the courtesy and cooperation shown by Lawrenceburg Demolition Landfill during the inspection. If you have any questions or comments concerning this correspondence, please contact me by email beverly.philpot@tn.gov or by phone (931) 840-4162.

Sincerely,



Beverly H. Philpot
Environmental Manager
Division of Solid Waste Management
Columbia Environmental Field Office

cc: DSWM/CO

SOLID WASTE COMPLAINT INSPECTION REPORT

SITE/PHYSICAL LOCATION

Lawrenceburg Demolition Landfill
DML50-0024
Grinnell Road
Lawrenceburg, TN 38464

PRIMARY CONTACT

Gary Wayne Hyde
Solid Waste Director

DATE/TIME OF INSPECTION

June 6, 2018, 2:00 PM

INSPECTION PARTICIPANTS

Gary Wayne Hyde, Solid Waste Director
Beverly Philpot, DSWM

REPORT PREPARED BY

Beverly Philpot
Division of Solid Waste Management
1421 Hampshire Pike
Columbia, TN
(931) 840-4162

PURPOSE OF INSPECTION

This inspection was conducted to evaluate the complaint of disposal of untreated septic sludge waste at a Class III Landfill. See attached photos from complainant #1, #2, #3, #4, #5, #6, and #7.

Facility Description:

Lawrenceburg Demolition Landfill (DML 50-0024), is a permitted Class III Landfill. Class III Disposal Facility refers to a landfill which is used for the disposal of farming wastes, landscaping and land clearing wastes, demolition/construction waste (as defined in Solid Waste Management Rule 0400-11-01-.01(2) Definitions). The Facility Specific Permit Conditions prohibit the facility from accepting liquids, industrial special wastes or wastes requiring special handling.

INSPECTION FINDINGS

During the course of the inspection the following violations were identified.

Division rule 0400-11-01-.04(2)(k)1.

- (2) General Facility Standards - Unless specifically noted otherwise, the standards of this paragraph apply to Class I, Class II, Class III, and Class IV disposal facilities.
 - (k) Waste Restrictions
 - 1. A facility may receive for disposal only those solid wastes it is allowed to manage under the terms of its permit.

Violation Observation:

Unauthorized waste accepted – Septic tank waste was observed on the working face. See attached photos #8, #9, #10, #11, #12, #13, #14, #15, and #16.

Corrective Actions:

The unapproved waste was removed from the Class III landfill on June 6 and 7, 2018, and taken to an appropriate disposal facility on June 8, 2018. Documentation of the waste profile, and manifest attached. See attachment #1 - 8 pages. The Division conducted a follow-up investigation on June 8, 2018 and confirmed the removal of the unpermitted waste. See attached photos #17, #18, #19, #20, #21, and #22.

Division rule 0400-11-01-.04(2)(b)4.

- (2) General Facility Standards - Unless specifically noted otherwise, the standards of this paragraph apply to Class I, Class II, Class III, and Class IV disposal facilities.
 - (b) Control of Access and Use

4. The facility must have trained personnel present and on duty at all times it is in operation to assure compliance with operational requirements and to prevent entry of unauthorized wastes.

Violation Observation:

Trained Personnel Not On Site – Trained personnel not on site at the time of the disposal of unauthorized wastes. Operator was present, but was not trained.

Corrective Actions:

Provide documentation by July 9, 2018, of training for landfill operators including the procedures to assure trained personnel are present and on duty at all times the landfill is in operation to assure compliance with operational requirements and to prevent entry of unauthorized wastes.



Beverly Philpot
Environmental Field Office Manager

Attachments:

- (1) Trip Report
- (2) Photographs from complainant
- (3) Photographs of violations
- (4) Post Clean-up Photographs



STATE OF TENNESSEE
 DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF SOLID WASTE MANAGEMENT
 WILLIAM R. SNODGRASS TENNESSEE TOWER
 312 ROSA L. PARKS AVENUE, 14TH FLOOR
 NASHVILLE, TN 37243

PRINT **RESET**

TRIP REPORT

FILE NUMBER

INSPECTOR ID
 B H Philpot

CHAT CMBA COOK JACK JCITY KNOX MEMP NASH

FACILITY NAME: Lawrenceburg FACILITY ID:

LOCATION: Grinnell Road CITY: Lawrenceburg COUNTY: Lawrence

TYPE OF FACILITY
 CLASS I CLASS II CLASS III CLASS IV NRS OTHER

PURPOSE OF VISIT: COMPLETE FOLLOW UP COMPLAINT OTHER
 BEGIN DATE: 6-6-18 BEGIN TIME: 2:00 AM PM

WEATHER CONDITIONS: Sunny
 DAY: MON TUES WED THU FRI SAT SUN

DESCRIPTION OF INCIDENT / COMPLAINT ETC: Sewage from waste (septic pumping) trucks unloaded sludge on landfill
 END DATE: 6-6-18 END TIME: 3:05 AM PM
 DAY: MON TUES WED THU FRI SAT SUN

INDIVIDUALS CONTACTED: Gary Wayne Hyde, Mayor Keith Durham

DSWM PERSONNEL PRESENT: Beverly Philpot

SAMPLES TAKEN: NO

PHOTOS TAKEN: Yes

COMMENTS: sewage sludge from two private septic tank trucks (same complaint) unloaded on the Class III landfill.
Waste to be picked up and sent to an appropriate disposal location.
unapproved waste accepted; operators not trained
(8210) 0400-11-01-04(2)(k)1 ~~0000~~; 0400-11-01-04(2)(b)4

INSPECTOR SIGNATURE: B. H. Philpot DATE: 6-6-18 DATE PREPARED: 6-6-18



Lawrenceburg Demo Landfill Complaint – June 6, 2018

Photo and narrative from complainant

The two septic tank trucks that dump the substance on the demo landfill had jaybird or Jaybyrd wrote on the side of them. This happened around 10 AM this morning.



Lawrenceburg Demo Landfill Complaint – June 6, 2018

Photo from complainant



Lawrenceburg Demo Landfill Complaint – June 6, 2018

Photo from complainant



Lawrenceburg Demo Landfill Complaint – June 6, 2018

Photo from complainant



Lawrenceburg Demo Landfill Complaint – June 6, 2018

Photo from complainant



Lawrenceburg Demo Landfill Complaint – June 6, 2018

Photo from complainant

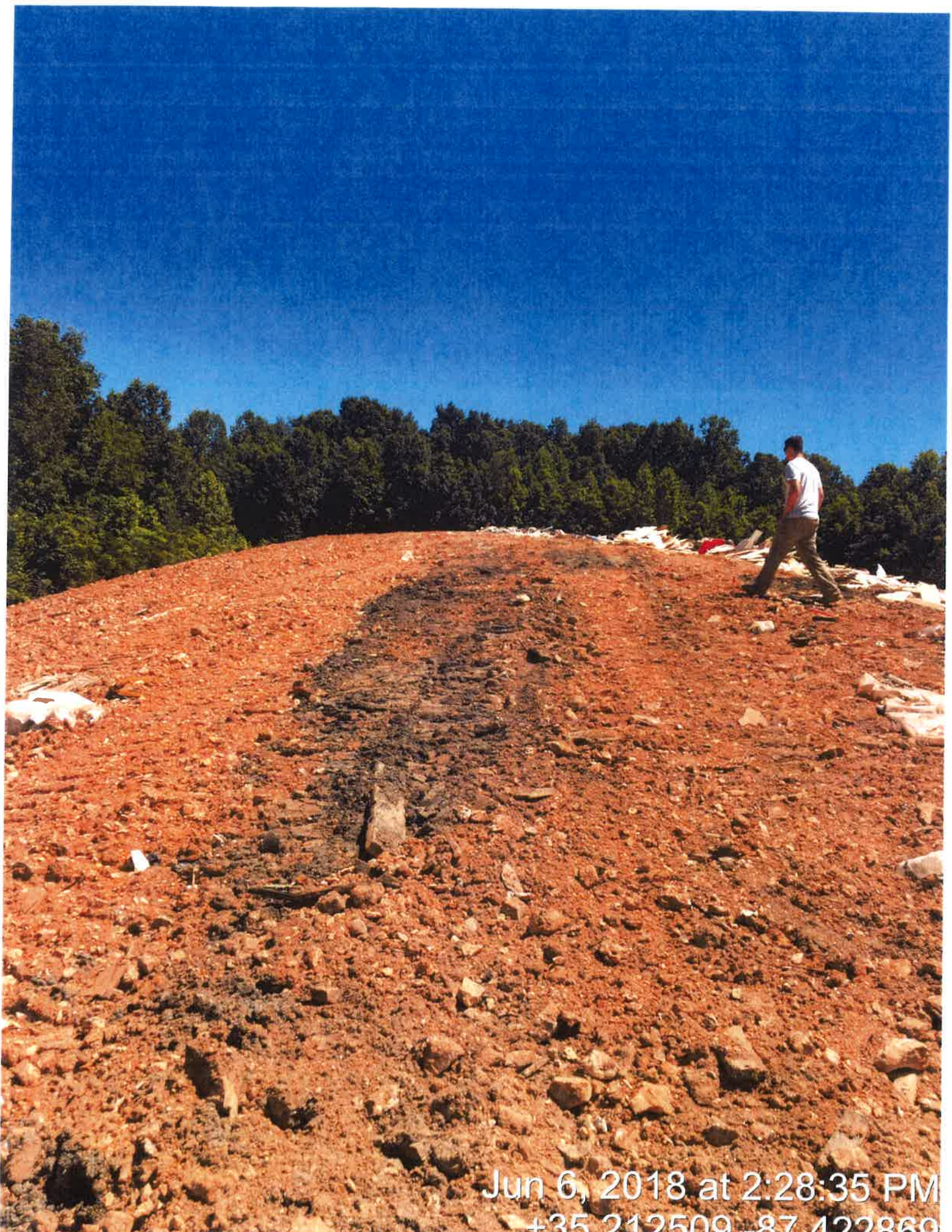


Lawrenceburg Demo Landfill Complaint – June 6, 2018

Photo from complainant



Jun 6, 2018 at 2:28:30 PM
+35 212509 -87 422869



Jun 6, 2018 at 2:28:35 PM
+35 212509 -87 422869



Jun 6, 2018 at 2:28:45 PM
+35 212509 -87 422869



Jun 6, 2018 at 2:29:04 PM
+35 206439 -87 382581



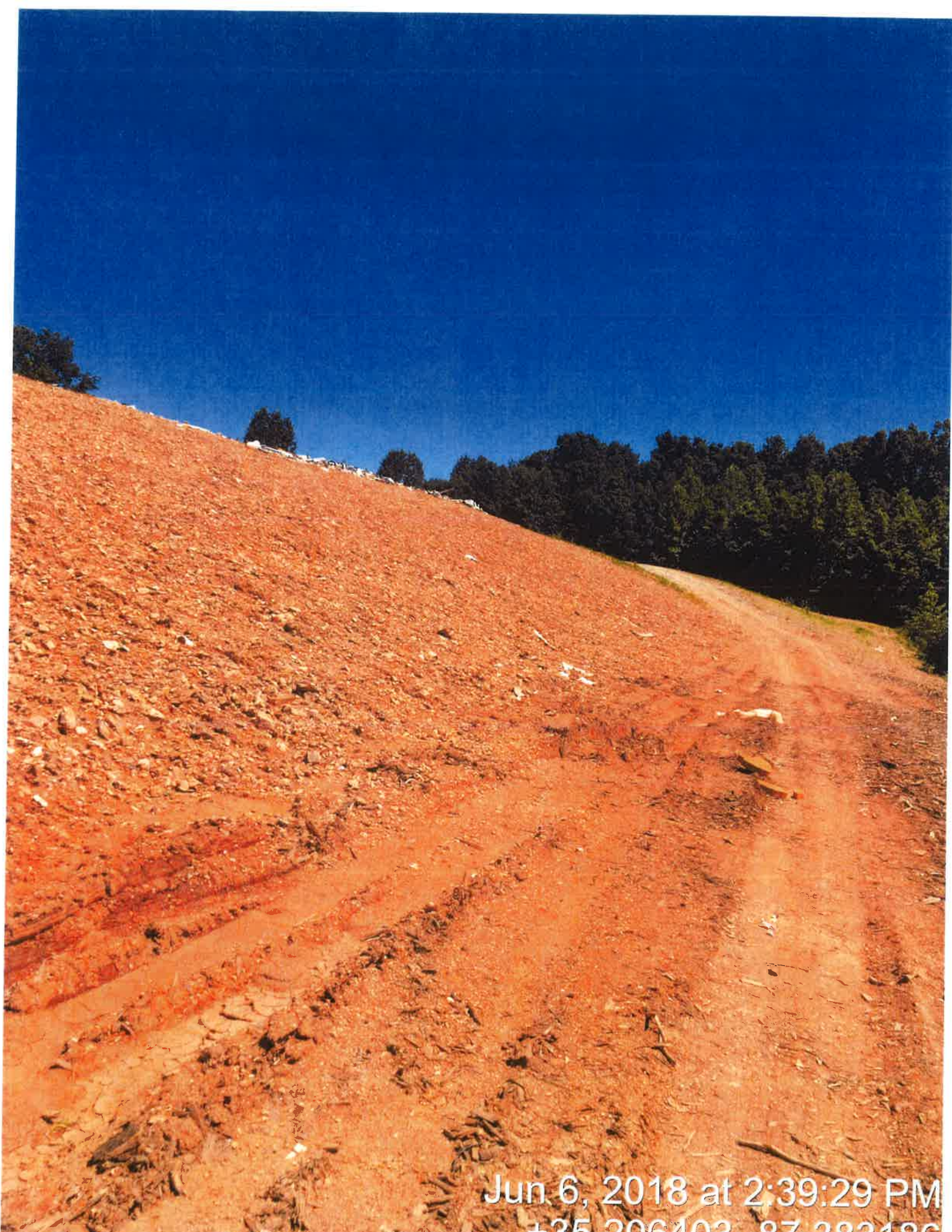
Jun 6, 2018 at 2:29:42 PM
+35 206465 -87 382703



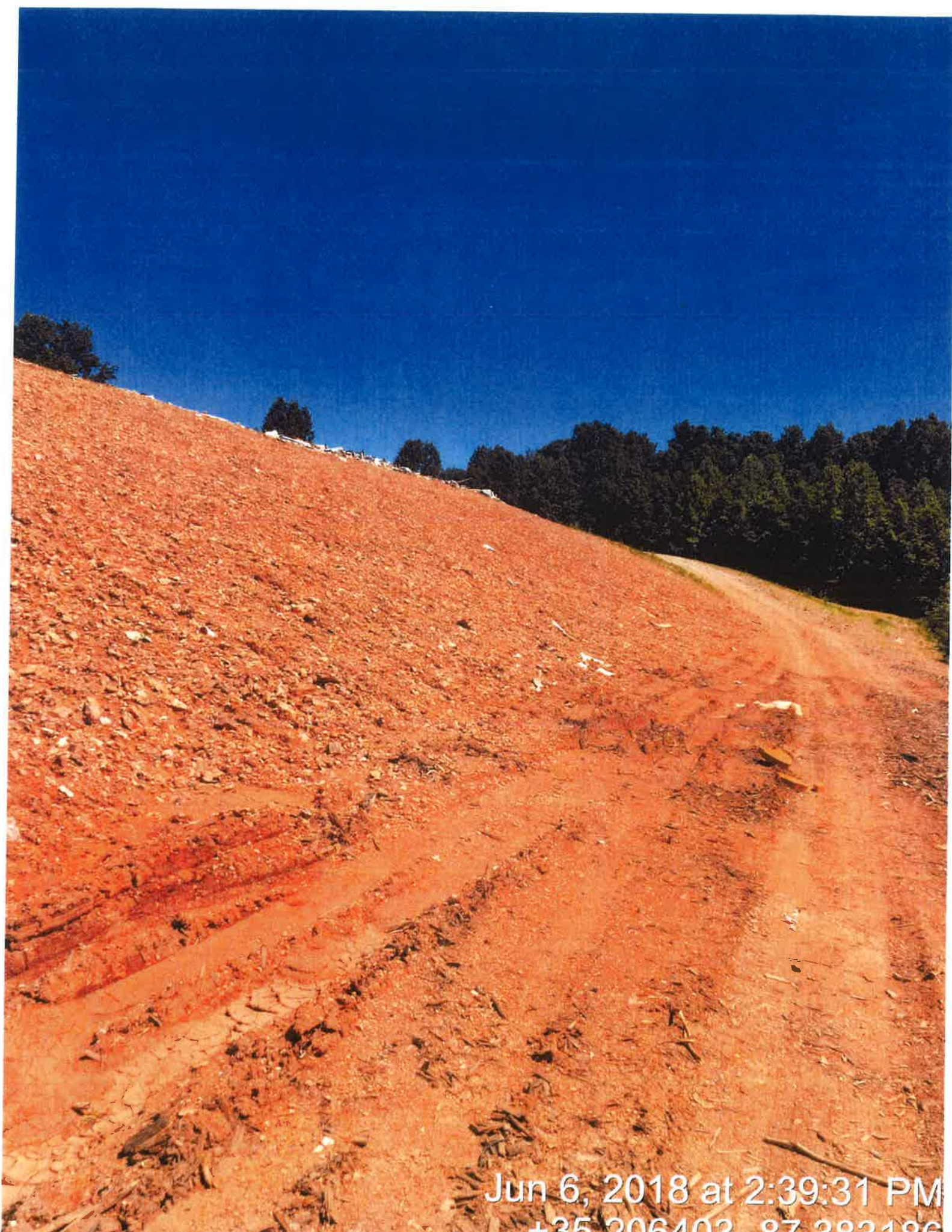
Jun 6, 2018 at 2:29:44 PM
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Jun 6, 2018 at 2:33:41 PM
+35 206036 -87 382571



Jun 6, 2018 at 2:39:29 PM
+35 206403 -87 383186



Jun 6, 2018 at 2:39:31 PM
+35 206403 -87 383186



293907

WASTE CONNECTIONS OF MISSISSIPPI WASTE MANIFEST NON-HAZARDOUS

GENERATOR INFORMATION		CUSTOMER/BILLING INFORMATION	
Generator Name: CITY OF LAWRENCEBURG		Billing Name: CITY OF LAWRENCEBURG	
Address: 2126 BAYLER DR		Address: 2126 BAYLER DR	
City: LAWRENCEBURG	Country: LAWRENCE	City: LAWRENCEBURG	Country: LAWRENCE
State: TN	Zip: 38464	State: TN	Zip: 38464
Site Location (if different):			

Approval Number	Description of Waste	Volume/Weight	Expiration Date	Container Type
NEMRL18-021	SEPTIC WASTE SEDIMENT/GRIT	8980 lbs	09/07/18	ROLL-OFF

*Attach Additional Sheet if necessary.

I hereby certify that the above described materials are non-hazardous wastes as defined by 40 cfr 261 or any applicable state law. Further, that the above named materials are probably classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

GARY WAYNE HYDE
 Generator/Authorized Agent Name X *Gary Wayne Hyde* Signature 06/08/2018 Date Shipped

TRANSPORTER INFORMATION

Transporter Name: City of Lawrenceburg EPA ID Number: _____
 Address: 2126 Bayler Dr. Truck Number: 87
Lawrenceburg, TN 38464 Phone Number: _____

I certify that no hazardous waste or other regulated substance was knowingly introduced to the waste while in my custody. The waste transported in this vehicle is the waste identified above, to the best of my knowledge.

GARY WAYNE HYDE
 Name of Authorized Agent X *Gary Wayne Hyde* Signature 06/08/18 Date Delivered

DISPOSAL SITE INFORMATION

Site Name: NEMRL Landfill Permit # SW0700010433
 Address: 2941 CR 302 WALNUT, MS 38683 Phone Number: (662)223-2331

I hereby acknowledge receipt of the above described materials Tons Received 4.49

PENNIE SMITH
 Name (Print or Type) X *Pennie Smith* Signature 06/08/2018 Date Received

LANDFILL

Zimbra

ghyde@lawcotn.org

Fwd: Profile Approved

From : Amanda Satterfield
<Amanda.Satterfield@WasteConnections.com>

Thu, Jun 07, 2018 05:26 PM

Subject : Fwd: Profile Approved

To : ghyde@lawcotn.org

Cc : David Green <David.Green@WasteConnections.com>,
April Parchman
<April.Parchman@WasteConnections.com>

Profile # NEMRL-18-021

We were able to get your profile approved. One of the conditions is that they want you to treat it with bleach prior to bringing the material to the landfill, but once that's done you can haul it to the landfill. Let me know if you have any questions.

Amanda L. Hanna-Satterfield
Special Waste Consultant
Waste Connections- BIG SOUTH Division
Cell# 662-760-3944
Serving Three Rivers and Buck Run Landfills

"BELIEVE YOU CAN AND YOU'RE HALFWAY THERE"- Theodore Roosevelt



Begin forwarded message:

From: Wastebits Support <support+notification@wastebits.com>
Date: June 7, 2018 at 4:16:55 PM CDT
To: <amandasa@wasteconnections.com>
Subject: Profile Approved



Approved with Conditions

**** RUSH/CITY OF LAWRENCEBURG - SEPTIC WASTE SEDIMENT/GRIT - ONE TIME PROJECT**

ID:

7EFE1E43

Approval #:

NEMRL-18-021

Generator:

CITY OF LAWRENCEBURG

Billing:

CITY OF LAWRENCEBURG

Facility:

Northeast Mississippi Regional Landfill

Approval Conditions

NEEDS TO BE TREATED WITH BLEACH---IF UNTREATED PLEASE REJECT

DIRECT BURIAL

[View Approval](#)



WASTE CONNECTIONS, INC.

Connected to Life

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WASTE CONNECTIONS OF MISSISSIPPI
WASTE MANIFEST NON-HAZARDOUS

GENERATOR INFORMATION		CUSTOMER/BILLING INFORMATION	
Generator Name: <u>CITY OF LAWRENCEBURG</u>	Address: <u>2126 BAKER DRIVE</u>	Billing Name: <u>CITY OF LAWRENCEBURG</u>	Address: <u>2126 BAKER DRIVE Attn: Gary Hyde</u>
City: <u>LAWRENCEBURG</u> Country: <u>LAWRENCE</u>	State: <u>TENNESSEE</u> Zip: <u>38464</u>	City: <u>LAWRENCEBURG</u> Country: <u>TENNESSEE</u>	State: <u>TENNESSEE</u> Zip: <u>38464</u>
Site Location (if different):			

Approval Number	Description of Waste	Volume/Weight	Expiration Date	Container Type
	<u>SEPTIC WASTE SEDIMENT/BELL</u>	<u>3 TONS</u>		<u>DUMP TRUCK</u>

*Attach Additional Sheet if necessary.

I hereby certify that the above described materials are non-hazardous wastes as defined by 40 cfr 261 or any applicable state law. Further, that the above named materials are probably classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Gary Wayne Hyde Generator/Authorized Agent Name Gary Wayne Hyde Signature 06/07/2018 Date Shipped

TRANSPORTER INFORMATION

Transporter Name: CITY OF LAWRENCEBURG EPA ID Number: _____
 Address: 2126 BAKER DRIVE Truck Number: _____
LAWRENCEBURG TN. 38464 Phone Number: (931) 679-7793

I certify that no hazardous waste or other regulated substance was knowingly introduced to the waste while in my custody. The waste transported in this vehicle is the waste identified above, to the best of my knowledge.

Gary Wayne Hyde Name of Authorized Agent Gary Wayne Hyde Signature _____ Date Delivered

DISPOSAL SITE INFORMATION

Site Name: North East Ms REGIONAL Landfill Landfill Permit # _____
 Address: _____ Phone Number: _____

I hereby acknowledge receipt of the above described materials Tons Received _____

 Name (Print or Type) _____ Signature _____ Date Received

LANDFILL

Northeast Mississippi Regional Landfill
 2941 County Road 302
 Walnut, MS 38683
 PH: 662.223.5445
 FX: 662.223.5678



FOR OFFICE USE ONLY

APPROVAL NUMBER:

EXPIRATION DATE:

APPROVED BY:

SPECIAL WASTE APPLICATION

Information utilized for completion of this form must originate from an authorized representative of the generator of the waste material.
 The information on this form must be **COMPLETELY FILLED OUT, TYPE WRITTEN**, and the form must be **SIGNED BY AUTHORIZED REPRESENTATIVE**.

A. PROFILE INFORMATION

1. Initial Recertification, list prior approval number(s):
 2. Have there been any changes to the composition of, or process generating this waste stream that would alter the characteristics of the waste stream?
 YES NO (Updated analysis may be required even if no change to process or composition.)

B. GENERATOR INFORMATION

1. Generator Name: CITY OF LAWRENCEBURG
 2. Address: 2126 BAYLER DR
 City: LAWRENCEBURG County: LAWRENCE
 State: TN Zip: 38464

C. CUSTOMER/BILLING INFORMATION

1. Billing Name: SAME AS OTHER ADDRESS
 2. Address:
 City: County:
 State: Zip:

3. Site Location (if different):
 4. Contact Name: GARY WAYNE HYDE
 5. Phone Number: (931) 629-7793 6. Fax Number:
 7. Email Address: gwh@lawcotn.org

3. Contact Name:
 4. Phone Number: 5. Fax Number:
 6. Email Address:
 7. Is there a service agreement on file? YES NO

8. State Facility ID # (if applicable):
 9. State Waste Code (if applicable):

8. Agent / Consultant:
 9. Letter of Authorization: YES NO

D. TRANSPORTER/SHIPPING INFORMATION

1. Name: TBD
 2. Street Address:
 City: State: Zip:
 3. Phone Number: 4. Fax Number:
 5. Contact Name:
 6. EPA or State Transporter ID #:
 7. Designated Landfill(s): NORTHEAST MS REGIONAL LANDFILL
 8. Packaging: Bulk Solids Bulk Liquids Drums Roll-Off
 Dump Truck Tank Truck Vacuum Box Bagged
 9. Estimated Volume: 3
 Tons Cubic Yards Drums Gallons Other:
 10. Shipping Frequency: _____ per: One Time Project
 Month Quarter Year Other: _____

E. WASTE STREAM INFORMATION

1. Common Name of Material or Waste Stream:
 SEPTIC WASTE SEDIMENT/GRIT
 2. Detailed Description of Process or How Generated (Attach additional sheet if needed):
 BUILD UP OF SEDIMENT/GRIT FROM SEPTIC WASTE VAC TANK
 3. Physical State at 70°F: Solid Semi-Solid Sludge
 Liquid Powder Other
 4. Free Liquids: NO YES % Liquids:
 5. Color: BROWN 6. pH Range:
 7. Odor: None Mild Significant Describe:
 8. Flash Point: N/A °F °C
 9. Reactive: NO YES with:
 10. State Required Information (if applicable):

F. NON-HAZARDOUS DETERMINATION

1. Attached Document(s) (check all that apply): Not Applicable Process Knowledge MSDS Certified Analytical Report Exempt Waste
 2. If Process Knowledge, provide details:
 3. If analytical data is attached, is the data derived from testing a representative sample in accordance with 40 CFR 261 and/or other applicable laws?
 YES NO Type of Sample: Composite Grab Analysis Provided:
 4. If Exempt Waste, check applicable item below: UST Corrective Action – 40 CFR 261.4(b)(10) PCB Bulk Product Waste – 40 CFR 761.62
 Oil & Gas E&P Waste – 40 CFR 261.4(b)(5) RCRA-Empty Containers – 40 CFR 261.7 Other (provide reference):

G. GENERATOR CERTIFICATION STATEMENT:

I hereby certify that all information contained herein is true and correct, and the material described is properly identified, classified, packaged, labeled, and prepared as indicated. I certify this waste is not hazardous or dangerous as defined by the U.S. EPA, or the state or province of origin. I certify this waste does not contain any regulated radioactive materials, that all known and suspected hazards have been disclosed, and that the waste is not a regulated hazardous waste by government or local authority, and does not contain PCB's regulated by TSCA or any other regulatory authority. I certify that all samples used for this analysis are representative of the materials described herein. I understand that all wastes may undergo inspection upon arrival at the designated facility and may be refused if the delivered material does not conform to the description herein. Notification will be provided immediately if there is a change in the composition of, or process generating this waste stream, prior to offering the waste for shipment or management.

Gary Wayne Hyde DEPARTMENT MANAGER
 AUTHORIZED REPRESENTATIVE NAME/TITLE

CITY OF LAWRENCEBURG
 COMPANY NAME

Gary Wayne Hyde
 AUTHORIZED REPRESENTATIVE SIGNATURE

06/07/2018
 DATE COMPLETED

INDUSTRIAL WASTE PROFILE

EXPLANATION OF INCOMPLETE TCLP ANALYSIS / WASTE ASSESSMENT

LANDFILL: NORTHEAST MS REGIONAL LANDFILL TIPPAH
Name County

GENERATOR: CITY OF LAWRENCEBURG 931-629-7793
Name Phone
2126 BAYLER DR LAWRENCEBURG TN 38464
Street Address City State Zip Code

WASTE STREAM: SEPTIC WASTE SEDIMENT/GRIT

WASTE STREAM ID#: _____
(optional)

Analysis was not conducted on the above-referenced waste stream for the following parameter(s). Justification for this exclusion of the parameter(s) is also included below. (Attach additional documentation if necessary).

<u>Parameter(s) Attached</u>	<u>YES / NO</u>	<u>Reasons for Exclusion</u>
TCLP Metals	— <input checked="" type="checkbox"/>	Not a potential contaminant
TCLP Volatiles	— <input checked="" type="checkbox"/>	Not a potential contaminant
TCLP Semi-Volatiles	— <input checked="" type="checkbox"/>	Not a potential contaminant
TCLP Pesticides	— <input checked="" type="checkbox"/>	
TCLP Herbicides	— <input checked="" type="checkbox"/>	Not a potential contaminant

GENERATOR CERTIFICATION

I hereby certify that the above information is true and correct to the the best of my knowledge and belief.

CITY OF LAWRENCEBURG
Company

[Signature]
Authorized Generator Certification Signature

CITY OF LAWRENCEBURG
SANITATION
DEPARTMENT MANAGER
Title

06/07/2018
Date

FORM # 1455IMPACTCLP-PA-WA

Zimbra

ghyde@lawcotn.org

Re: WC/ Buck Run Profile forms - City of Lawrenceburg

From : Amanda Satterfield
<Amanda.Satterfield@WasteConnections.com>

Thu, Jun 07, 2018 04:15 PM

✉ 1 attachment

Subject : Re: WC/ Buck Run Profile forms - City of Lawrenceburg

To : Gary Wayne Hyde <ghyde@lawcotn.org>

It's ok! I've got everything I need. Just waiting on Corporate to issue the approval.

Amanda L. Hanna-Satterfield
Special Waste Consultant
Waste Connections- BIG SOUTH Division
Cell# 662-760-3944
Serving Three Rivers and Buck Run Landfills

"BELIEVE YOU CAN AND YOU'RE HALFWAY THERE"- Theodore Roosevelt

WC

On Jun 7, 2018, at 4:03 PM, Gary Wayne Hyde <ghyde@lawcotn.org> wrote:

MRS.SATTERFIELD I FAILED TO TELL YOU MY ASSISTANT WOULD BE THE ONE SCANNING THE DOCUMENTS.

From: "Amanda Satterfield" <Amanda.Satterfield@WasteConnections.com>

To: "gwh@lawcotn.org" <gwh@lawcotn.org>

Cc: "David Green" <David.Green@WasteConnections.com>, "April Parchman" <April.Parchman@WasteConnections.com>

Sent: Wednesday, June 6, 2018 5:47:47 PM

Subject: WC/ Buck Run Profile forms - City of Lawrenceburg

Mr Gary Wayne,

It was a pleasure speaking with you this afternoon. As a follow up to our conversation I've completed/attached both pages of the profile application based on the info you gave me. Please review, sign/date, and send both pages back to me. I'm going to have this processed as a rush, so as soon as I get these back from you I will submit and hopefully have a profile approval back within a couple of hours. Once I have the approval I will forward it back to you including the Profile #.

The last attachment is an electronic manifest. You will complete the manifest (Generator & waste info), print, and sign to send with the load to the landfill at the time of disposal. You will need to make sure to reference your Profile # on the manifest, bc that's how we identify the waste. (example of a profile approval #: NEMRL-18-082)

If you have any questions or if there is anything else I can do to be of assistance please don't hesitate to let me know. After the waste has been disposed of, we can provide you with a copy of the Profile, disposal ticket, and executed manifest to show that its been properly disposed of. See pricing below to cover the cost of setting up the profile.

\$50/profile fee (one time charge to initially set up)

\$100/Rush fee to expedite the profile/approval process

Amanda L. Hanna-Satterfield
Special Waste Consultant
Waste Connections - BIG SOUTH Division
Cell# 662-760-3944
Serving Buck Run and Three Rivers Landfills

"Believe you can and you're halfway there" - Theodore Roosevelt

<image001.png>

Visit www.snappyapprovals.com to submit a new Special Waste Profile or to access current approvals.



WASTE CONNECTIONS INC.
connect with the future

image001.png
39 KB



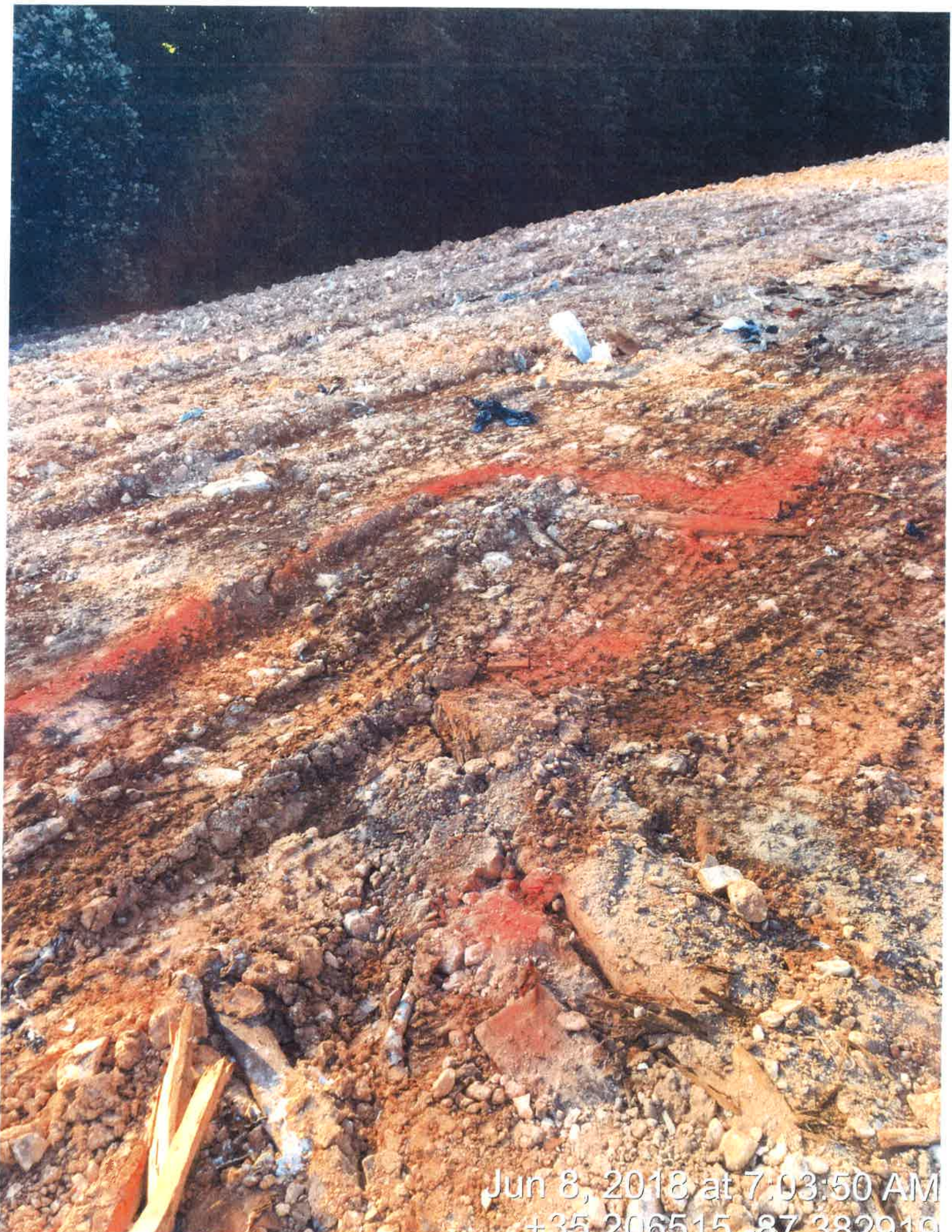
Jun 8, 2018 at 7:03:27 AM
+35 206515 -87 382919



Jun 8, 2018 at 7:03:29 AM
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Jun 8, 2018 at 7:03:47 AM
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Jun 8, 2018 at 7:03:50 AM
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Jun 8, 2018 at 7:03:56 AM
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Jun 8, 2018 at 7:04:08 AM
+35 206599 -87 382868