3177

NAWC
PENNSYLVANIA
National Association of Water Companies

MOVING WATER FORWARD

RECEIVED
IRRC
2017 SEP 25 P 4:02

www.nawc.org

September 25, 2017

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

RE: Comments on Proposed Rulemaking – Chapter 109
Safe Drinking Water; General Update and Fees

The NAWC (www.nawc.org) represents all aspects of the private water service industry including ownership of regulated drinking water and wastewater utilities and the many forms of public-private partnerships and management contract arrangements. The Pennsylvania Chapter consists of five-member companies that provide safe and adequate drinking water service to over 3.1 million Pennsylvanians in 492 communities in 39 counties. In addition, three-member companies provide wastewater service to approximately 195,000 Pennsylvanians in 34 communities across nine counties.

On May 17, 2017, the Environmental Quality Board (EQB) adopted the proposed rulemaking to amend Chapter 109 (relating to safe drinking water). The amendments include three parts:

1. Incorporate the remaining general update provisions that were separated from the proposed Revised Total Coliform Rule (RTCR) as directed by the EQB on April 21, 2015, including revisions to treatment technique requirements for pathogens, clarifications to permitting requirements, and new requirements for alarms, shutdown capabilities, and auxiliary power.

2. Amend existing permit fees and add new annual fees to supplement Commonwealth costs and fill the funding gap ($7.5 million).

3. Add new amendments to establish the regulatory basis for issuing general permits, clarify that noncommunity water systems (NCWS) require a permit or approval from the DEP prior to construction and operation, and address concerns related to gaps in the monitoring, reporting and tracking of back-up sources of supply.

Subchapter B. MCLs, MRDLs or TREATMENT TECHNIQUE REQUIREMENTS
§ 109.202 (State MCLs, MRDLs and treatment technique requirements)

This section provides for filtered water turbidity criteria for "Conventional or direct filtration" and "Membrane filtration." Specifically, the filtered water turbidity for all public water systems shall meet the following criteria:

- Be less than or equal to 0.30 Nephelometric Turbidity Unit (NTU) in at least 95% of the measurements taken each month under § 109.301 (1).
- Be less than or equal to 1.0 NTU at all times, measured under § 109.301 (1).

The federal turbidity requirement is 0.3 NTU, not 0.30. Adding a zero to the maximum contaminant level (MCL) is not based on science – see Standard Methods methodology regarding significant figures. The same issue applies to establishing the turbidity limit of 1.0 NTU, as it should be 1 NTU per the EPA limit for consistency. TAC discussed the "significant figure" issue at length and referenced the formal comment[i] regarding significant figures by Jeanne Van Briesen, Professor, Carnegie Mellon University, which was provided to DEP about the proposed Disinfection Requirements Rule.

However, in the Preamble[ii] [Pg. 16 of the Proposed Rulemaking that was posted on the EQB website on May 17, 2017], "DEP avers that the revisions to the turbidity standard are warranted." "Additionally, DEP asserts that it is appropriate to "add zeros" for some drinking water standards where the level of sensitivity is warranted by the analytical method." [Preamble, Pg. 17]

The NAWC supports the comments made by TAC and Professor Van Briesen, and believes the rulemaking should adhere to the federal standard by not adding a zero to the MCL. The change from .3 to .30 NTU and 1 to 1.0 result in a 17% and 49% increase respectively relative to the current regulations.

Subchapter C. MONITORING REQUIREMENTS
§ 109.301 (11) (Monitoring requirements for entry points that do not provide water continuously)

Under § 109.301 (11), the proposed rulemaking would, at a minimum, require all entry points (EPs) to provide water to the public on an annual basis to ensure all sources and entry points are included in routine compliance monitoring.

According to the Preamble [Pg. 20]: "This amendment is intended to address concerns related to gaps in the monitoring, reporting and tracking of back-up water sources and entry points."

- "Currently, sources and entry points that do not provide water continuously are required to be monitored when used. However, monitoring requirements for back-up sources are not currently tracked, which means no verifiable controls are in place to ensure that all sources and entry points meet safe drinking water standards."
- "For community water systems (CWSs), as many as 12% of all sources may not be included in routine compliance monitoring, yet these sources can be used at any time."

- "The use of these sources without proper monitoring and verifiable controls could lead to an increased risk to public health."

Moreover, [Preamble, Pg. 22], "DEP anticipates that select purchased interconnections will be able to retain the "emergency" designation if the following criteria are met:

- Using the last three years of historical water use data, the water supplier can demonstrate that the purchased interconnection has only been used for emergency purposes.
- Emergency use has not occurred more than 14 days per year, excluding use under Commonwealth or Federal emergency declarations.
- The Department has conducted an annual compliance check using reported water use data."

In addition, "on a case-by-case basis, DEP also anticipates that select sources may be able to be retained in the permit, without conducting routine annual compliance monitoring, if documentation is provided that the use of the source is limited by some other entity or permit or approval."

"Select sources that meet these criteria will be covered by a special condition in the permit that requires DEP notification and completion of compliance monitoring prior to use."

EQB is seeking comment on this amendment, the inclusion of the additional information provided above related to retention of the emergency designation of interconnections, and whether deferred implementation is needed. The EQB will consider other options that address these concerns while providing the same level of public health protection.

The NAWC supports the approach outlined in the Preamble; however, it was not incorporated into the Annex A and we believe that it should be included in the regulation itself. We recommend the following language be included in §109.301 (11) (ii):

> **§109.301 (11) (ii) At a minimum, either (a) all entry points shall provide water to the public on an annual basis to assure all sources and entry points are included in routine compliance monitoring; or (b) those backup sources that are not used annually shall be subject to an alternative monitoring program that (i) assures that the raw water quality of such backup sources are compatible with the treatment systems through which they would be utilized such as to assure that the treated water produced from such sources would comply with all applicable drinking water standards, and (ii) provides for routine compliance monitoring during all periods when such backup sources are being utilized.**

This would provide greater flexibility to a water provider and not pose any additional compliance or public health risks because the notification and monitoring prior to use would be in place.

§ 109.303 (Sampling requirements)

§ 109.303 (a) (4) clarifies that samples for determining compliance with MCLs (blending and source monitoring) shall also include radionuclide contaminants and shall be taken at each entry point to the distribution system "which is representative of each source" after an application of treatment during periods of normal operating conditions. TAC recommended that DEP provide additional discussion and examples from the DEP to clarify this amendment, as the conditions described are confusing. There may be too many water supplier real world scenarios to be covered by a blanket requirement so we believe that this provision should be addressed in a facility permit.

According to the Preamble [Pg. 23], DEP "avers that the system-specific scenarios will be able to be addressed in the system's comprehensive monitoring plan required under § 109.717.

The EQB is seeking comment on whether additional regulatory language is needed for clarity.

The NAWC agrees with TAC and believes additional clarification is necessary regarding purchased interconnections.

Subchapter E. PERMIT REQUIREMENTS
§ 109.511 (General permits)

Under this provision, the DEP may issue a general permit, in lieu of issuing a construction and operation permit for a specific category of modifications. *The EQB is seeking comment on the types of modifications or activities that may be appropriate for a general permit.*

The NAWC suggests that minor permit amendments are excellent candidates for general permit management. For example, minor amendments are required for tank paintings, equipment upgrades, and minor chemical changes:

- Change in chemical product type or provider, application/use remains unchanged, NSF certification applies (i.e., Carus 1100 vs Carus 8100).
- Change in equipment from one equivalent brand/model to another.
- Equivalent pump replacement – change in manufacturer/model, but performance characteristics are unchanged.
- In-kind tank replacement (chemical, finished water, etc.).
- Tank rehabilitation (including interior/exterior painting) where the interior paint has NSF certification.

However, to achieve a full permit for a minor permit change, DEP must visit and inspect the change at the site, then write the permit or amend an existing permit with the additional information. The requirement to visit and inspect under some circumstances does not make any sense (i.e., DEP staff cannot see interior tank paintings). Since the PWS must supply a certificate of completion to DEP once the work is done, a general permit for some, if not all, minor permits would help PWS obtain their operating permits quicker and would relieve some of the burden of DEP (also with lack of staff in the field) having to do site visits to confirm work done.

Subchapter F. DESIGN AND CONSTRUCTION STANDARDS

§ 109.602 (Acceptable design) (h) and (i) (Alarm and shutdown capabilities)

Under this proposal, a PWS that provides filtration of surface water or Groundwater Under Direct Influence of surface water (GUDI) sources and that is not staffed continuously while the plant is operating must be equipped with alarm and shutdown capabilities within 12 months.

The TAC requested that DEP provide cost estimates for compliance with these provisions and an evaluation of whether the 12 months is adequate time for PWSs to comply given the overall costs associated with this regulatory package, including the addition of new and increased fees.

According to the Preamble [Pg. 54], DEP answered: "Depending on options chosen, systems may incur $8,860 to $11, 980 per treatment plant with annual maintenance costs of $600."

In addition, under (h), the DEP may require a PWS to meet the requirements of subsection (i) (Alarm and shutdown capabilities), where such capabilities must be set at a level no less stringent than the level needed for the facility to continuously maintain compliance with applicable MCLs, MRDLs and treatment technique requirements.

Further, under § 109.602 (i) (2), alarm and shutdown capabilities must be established for the following parameters, at a minimum:

i. Individual filter effluent turbidity and combined filter effluent turbidity for filter plants treating surface water or GUDI sources.
ii. Entry point disinfectant residual.
iii. Clearwell water levels used for CT compliance.
iv. **Any other operational parameter determined by the Department as necessary for the system to maintain compliance.**

However, NAWC has concerns with (i) (2) (iv) and believes that it may be too far reaching and cost prohibitive.

Subchapter G. SYSTEM MANAGEMENT RESPONSIBILITIES
§ 109.606 Chemicals, materials, and equipment

Provides for acceptability of certain equipment certified in conformance with Guidelines for Public Drinking Water Equipment Performance issued by NSF (referred to as "PDWEP")

NAWC believes that the current wording in the regulation regarding "NSF certification for materials or equipment which may come into contact with or affect the quality of the water" is overly broad. For example, it makes no sense to attempt to provide DEP NSF/ANSI certification for raw water facilities or materials such as concrete or raw stainless-steel materials which are commonly used in Water Treatment Plant facility construction. In other instances, NSF certification for equipment that is commonly used in the water industry is not readily available or in some cases not available at all. Some products such as magnetic chemical transfer pumps do not provide NSF certification but are preferred to be used because of their leak proof design characteristics.

Finally, it is unclear how a standards agency, such as NSF, is going to certify performance of a given piece of equipment, such as a GAC contactor, when the unit's performance is directly related to source water quality characteristics and must be modelled on a case by case basis. Given that certain water treatment equipment will perform differently on different water sources, how would the certifying agency guarantee anything? The way in which this provision is drafted will not improve the safety of water. Instead, it will lead to confusion and at the worst, insure non-compliance.

§ 109.701 (Reporting and recordkeeping)

Under § 109.701(a) (2) (i) (A), the test results for performance monitoring for PWSs providing filtration and disinfection of surface water or GUDI sources is being revised to include "the combined filter effluent" turbidity performance monitoring. However, combined filter effluent may not be available in certain filter plants.

In addition, § 109.701(a) (2) (i) (A) (VIII) and (IX), and (ii) (A) (III) includes the addition of a zero to the required MCLs, which is not a significant figure. This also appears under (e) (2) (v) and (vi) on page 25. The "zero" is not a significant digit, what is the rationale, scientific methodology, peer review or public health benefit vs cost and where is the data to support the previous DEP statement to TAC that public health may be improved by "ratcheting it down."

NAWC supports the comments made by TAC and believes the rulemaking should adhere to the federal standard by not adding a zero to the MCL.

Moreover, the proposed revisions to § 109.701 (e) (2) (Reporting requirements for public water systems required to perform individual filter monitoring under § 109.301 (1) (iv)) **are more stringent than the federal requirements** (EPA Interim Enhanced Surface Water Treatment Rule § 141.175 Reporting and recordkeeping requirements) in that the current Individual Filter Effluent (IFE) is 1.0 NTU for (v), 0.5 NTU for (vi), 1.0 NTU for (vii) and 2.0 NTU for (viii) and filtration technologies are not differentiated between in the current regulation.

§ 109.708 (System service and auxiliary power)

Under the proposed rulemaking [Pg. 5 Preamble], "water suppliers will need to provide on-site auxiliary power sources (i.e., generators), or connection to at least two independent power feeds from separate substations; or develop a plan for alternative provisions, such as interconnections with neighboring water systems or finished water storage capacity."

The TAC commented that the DEP should not be prescribing the methods by which a PWS obtains auxiliary power. Moreover, DEP has not sufficiently evaluated the cost of providing auxiliary power. For example, secondary power feeds may not be attainable in rural areas or may be extremely cost prohibitive.

According to the Preamble [Pg. 57], DEP answered: "CWSs that do not have a functional generator or do not have existing capability to meet this requirement via the alternate provision options may need to purchase a generator. The generator should be adequately sized such that it can supply power to critical treatment components necessary to supply safe and potable water."

"Therefore, the cost of the generator will be proportional to the size of the system (e.g., less expensive for small systems)." "It is difficult to predict system costs because of the various options to comply with the proposed revisions. Estimates for small systems are $3,000 - $4,000 for the installation of a transfer switch, generator and concrete pad." "Costs for medium and large systems could range from $50,000 - $200,000 per treatment plant." "Not all systems will require auxiliary power. Some systems may already meet reliability criteria through storage or interconnections." "An estimated 30% of small systems (< 3,300 or 485 systems may need to install a back-up power supply. **The cumulative cost is estimated to be $1,940,000.**" "The estimate for medium and large systems is that 20% or 65 systems may need to install a back-up power supply at a **cumulative cost of $8,125,000.**"

In addition, DEP has discounted the fact that systems may avail themselves mutual aid networks like PaWARN to meet auxiliary power demands.

EQB is seeking comment on the following:

- *What actual costs have been incurred by water systems that have already installed an auxiliary power supply or other resilience measures?*
- *Which facilities should be considered a primary component of a water system, meaning the facilities are indispensable to the effective operation of the water system?*
- *Costs vary considerably for portable versus fixed generators. The type of fuel supply also impacts costs. What are the pros and cons of these various options?*
- *Do additional alternatives exist to meet the system service requirements of subsection (a)?*

The NAWC is unsure whether this provision is intended to apply to only entry point facilities (e.g., source, treatment and associated pumping) or also to all types of distribution system facilities. It seems to apply broadly based on the wording in §109.708 (a) "sufficient to maintain system pressure specified in §109.607 (relating to pressures) throughout the distribution system."

The proposed language is ambiguous and ignores, for both entry point and distribution system facilities, the impact of storage, interconnections, portable generators, valves to transfer between pressure zones and multiple other viable practices. While the proposed rulemaking does allow for a case-by-case approval of alternative provisions (see §109.708 (c)), the proposed rulemaking provides no guidance for the sizing of generators or criteria to approve alternative provisions. Many PWSs have small distribution booster stations that have inadequate space or inappropriate conditions for installing onsite generators and usually located where dual power feeds are not feasible. In such instances, portable generators are utilized to meet emergency power needs.

Over the past five years, for example, our largest member company (Pennsylvania American Water) has spent approximately $4 million incorporating emergency generators into their facilities and an additional $8-10 million in costs associated with other resilience measures such as dual source intakes, interconnects with other public water suppliers and/or additional distribution storage.

Emergency power by itself does not ensure resiliency; therefore, NAWC continues to believe that the issue of auxiliary power is one that should be addressed in each facility's

Emergency Response Plan and up to the PWSs to decide whether such capital investment is necessary.

Subchapter N. DRINKING WATER FEES

According to the EPA's recent performance evaluations (2009, 2012, and 2016) of Pennsylvania's Safe Drinking Water Program, and by DEP's own admission, DEP doesn't have enough staff to perform its core functions (i.e., sanitary surveys and unaddressed violations) in a timely manner.

Most recently, DEP received a letter from EPA on 12/30/2016[iii] regarding its performance evaluation of the PA DEP's primacy enforcement responsibilities (i.e., drinking water program primacy).

With respect to the Safe Drinking Water Program, DEP receives $7.7 million of its funding from the General Fund. According to the Preamble, "these proposed annual fees, as well as the proposed increases in permit fees in § 109.1404 (relating to community and noncommunity water system permitting fees), are expected to generate the **$7.5 million** necessary to restore staffing levels and to provide services required under the SDWA to the **8,521 PWSs** in this Commonwealth and the **10.7 million customers** they serve."

NAWC believes that core functions of the DEP, like those involving the Safe Drinking Water Program, should be covered by the General Fund. The taxpayers (our customers) are already paying for the program through tax dollars; therefore, fees should never be relied upon to cover the cost of the program directly related to the public's health.

§ 109.1402 (Annual fees)

This rulemaking's Preamble explains that 26 states charge annual fees to augment program costs, ranging from $25 to $160,000. However, the proposed annual fees in this rulemaking for CWSs, which are based on population, range from $250 to $40,000. The per-person costs range from $0.35 to $10 per person per year.

Proposed CWS Annual Fees (Based on Population)

Population Served	Annual Fee	Cost/Person/Year
25—100	$250	$2.50--$10.00
101—500	$500	$1.00--$4.95
501—1,000	$1,000	$1.00--$2.00
1,001—2,000	$2,000	$1.00--$2.00
2,001—3,300	$4,000	$1.21--$2.00
3,301—5,000	$6,500	$1.30--$1.97
5,001—10,000	$10,000	$1.00--$2.00
10,001—25,000	$20,000	$0.80--$2.00
25,001—50,000	$25,000	$0.50--$1.00
50,001—75,000	$30,000	$0.40--$0.60
75,001—100,000	$35,000	$0.35--$0.47
100,001 or more	$40,000	≤ $0.40

What the proposed rulemaking doesn't explain is that the annual fee applies to each Public Water Supply ID number so it's misleading. Some systems, particularly the medium and large water systems serving in multiple communities or counties, are likely to have more than one ID numbers, which means that they could be required to pay annual fees above and beyond the $40,000 presented in the proposed rulemaking. This also means that those systems that only have one ID number, but may still serve a large population, would only pay an annual fee of $40,000.

For example, our largest member company (Pennsylvania American Water) has 66 Public Water Supply ID numbers and estimates that they would pay an increase in annual fees of approximately $830,000.

Likewise, Suez has 15 PWS ID numbers, with a population of 150,000 would experience an increase of $124,000 or an increase in magnitude of 26 times the current rate. Furthermore, this rate would be over three times the rate imposed on a city serving a population of 1.5 Million.

The larger systems are not the only ones to express concern over the proposed annual fees. While the very small systems (serving a population of 3,300 or less) would pay $250 to $4,000, the medium sized systems (serving a population of 3,301 to 50,000) would pay $6,500 to $25,000. This is a significant economic burden on these CWSs.

The Preamble [Pg. 11] states that: "The fees will most likely be passed on to the 10.7 million customers of these PWSs as a user fee." However, NAWC's member companies are regulated by the Public Utility Commission (PUC) so they will have to go before the PUC to recover these costs through a general rate case, which is costly and time consuming. Therefore, if this rulemaking is adopted, PUC-regulated systems will be forced to seek more frequent rate increases to recover these annual fees and increased permit fees.

The central question is whether this proposed annual fee structure meets the statutory requirement in the PA Safe Drinking Water Act (SDWA) that says: "***Such fees shall bear a reasonable relationship to the actual cost of providing a service.***" (Section 4 (c) of Act 43 of 1984)

Adequate funding for the Safe Drinking Water Program is essential; however, increasing fees inequitably or to shift costs from one industry sector to another doesn't appear to bear a reasonable relationship to the actual cost of providing a service.

While the EQB must also consider the impacts of the proposed fees on small businesses (68% of the water systems in PA are considered small businesses) as part of the regulatory analysis required under section 5 of the Regulatory Review Act, the SDWA provision is clear with respect the intent of the General Assembly.

NAWC opposes the proposed annual fees based on population served and Public Water Supply ID number. However, if the proposed annual fees are to be based upon population served, they should not be tied to Public Water Supply ID numbers; rather, there should be a minimum and maximum annual fee so CWSs (large or small) are not unfairly burdened with subsidizing the administration and enforcement of the Safe Drinking Water Program.

NAWC believes that any subsidization should come from the General Fund and not through fees paid by the CWSs and their customers/ratepayers.

Finally, NAWC believes that any annual fee or permit fee increase should be phased-in to allow CWSs to budget for these new expenses. If this proposed rulemaking were to be given final approval in mid-to-late 2018, CWSs would find it difficult to include in their budget for 2019 and some may need to seek an increase in rates just to cover these expenses or be forced to defer scheduled capital projects or maintenance to balance their budget.

§ 109.1404 (Community and noncommunity water system permitting fees)

This section establishes permitting fees, based upon population served, involving the application for a construction permit or a major construction permit amendment.

Proposed Permit Fees

Title	Current Fee	Proposed Fee
(CWSs and NCWSs)		
Permit/major amendment	$750	$300--$10,000
Minor amendment	$0	$100--$5,000
Operations permit	$0	$50
Emergency permit	$0	$100
Change in legal status	$0	$100
(Additional NCWS Fees)		
Application for approval	$0	$50
4-log permit	$0	$50

NAWC opposes the proposal to base permit fees on population served. Permit fees should be based on the scope of work (i.e., type of project, scope of the project, project size and complexity) and are independent of the system size.

The proposed permit fees/increases will have a significant economic impact on the industry. Our largest member company (Pennsylvania American Water), for example, estimates that they require approximately 100 permits annually (permit/major amendment or minor amendment) and would experience a fee increase from approximately $100,000 to over $500,000 or an increase in excess of $400,000 or 5 times the current fee amount. Again, these are costs that they cannot recover until their next general rate case before the PUC.

Furthermore, NAWC believes that the original intent of minor permits was to provide the DEP with a simple notice of the applicant's intent. Since these are minor projects there should be very little need for extensive DEP review. Unfortunately, minor permits have at times been treated by the DEP nearly the same as major permits and appear to consume the same level of resources for both the PWS and DEP.

In addition, minor permits should not require extensive DEP review so any such permit fees should be substantially less than what is being proposed.

§ 109.1405 (Permitting fees for general permits)

This proposed section explains that fees for general permits will be established in the general permit and will not exceed $500. The fee for each general permit will be based on a workload analysis prepared prior to issuance of a draft of the general permit for public comment.

NAWC supports the use of general permits (see comments under § 109.511), which will likely reduce the work load on both DEP and PWS and reduce costs.

§ 109.1406 (Permitting fees for bottled water and vended water systems, retail water facilities, and bulk water hauling systems

NAWC believes that the bottled and vended water fees do not seem equitable in relationship to PWSs and the cost of bottled water to the public far exceeds the "penny per gallon" average seen amongst PWSs. For example, why isn't the fee for bottled and vended water based upon gallons produced?

§ 109.1407 (Feasibility study)

This section establishes a fee, based on population served, for an application for review of a feasibility study or pilot study. Currently, there is no fee for a feasibility study, but the proposed fee ranges from $300 to $10,000, based on population served.

NAWC opposes such a fee being based on population served and believes that it should be based on the type of project, scope of the project and complexity of the project in accordance with the Pennsylvania Safe Drinking Water Act.

Conclusion

NAWC is not opposed to the concept of user fees to pay for some of the resources that are consumed in regulating CWSs, but we believe that funding for the DEP's core functions should first come from the General Fund and any user fees should be structured to bear a reasonable relationship to the actual cost of providing a service as required by the Pennsylvania Safe Drinking Water Act (Section 4 (c) of Act 43 of 1984).

NAWC appreciates the opportunity to present these comments on this proposed rulemaking and respectfully requests the EQB's consideration.

Respectfully submitted,

Erik A. Ross

Erik A. Ross
Governmental Relations
Milliron & Goodman
200 North 3rd Street

Suite 1500
Harrisburg, PA 17101
(717) 232-5322
erik@millirongoodman.com

---

[i] 4/17/2016 Jeanne M. VanBriesen, Ph.D., P.E., Carnegie Mellon University Comments on Proposed Disinfection Requirements Rule
http://www.ahs.dep.pa.gov/eComment/ViewComments.aspx?enc=8YWIcHIdijzUAfiG53EkjT71%2fkEF%2fLQ%2fP436oCNhfE%3d

[ii] Preamble – Proposed Rulemaking, Safe Drinking Water (General Update and Fees). as published on the EQB Website May 17, 2017
http://files.dep.state.pa.us/PublicParticipation/Public%20Participation%20Center/PubPartCenterPortalFiles/Environmental%20Quality%20Board/2017/May%2017/7-521_SDW%20General%20and%20Fees_Proposed/02_7-521_SDW%20General%20and%20Fees_Preamble.pdf

[iii] 12/30/2016 EPA Letter to DEP, https://drive.google.com/file/d/0B4Y3VQLxjkxObjZ0ZXISVDZxRWc/view