

IN THE COURT OF COMMON PLEAS
JEFFERSON COUNTY, OHIO

STATE OF OHIO, ex rel.
BETTY D. MONTGOMERY
ATTORNEY GENERAL OF OHIO,

Plaintiff,

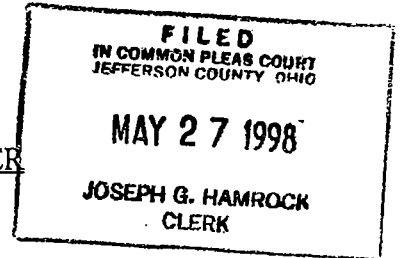
CITY OF STEUBENVILLE,

Defendant.

CASE NO. 97-CV-383

JUDGE JOSEPH J. BRUZZESE, JR.

CONSENT ORDER



The Complaint in the above-captioned matter having been filed herein, and the Plaintiff State of Ohio by its Attorney General Betty D. Montgomery (hereinafter referred to as "Plaintiff") and Defendant City of Steubenville (hereinafter referred to as "Defendant") having consented to the entry of this Order,

NOW THEREFORE, without trial of any issue of fact or law, and upon consent of the parties hereto, it is hereby ORDERED, ADJUDGED AND DECREED as follows:

I. JURISDICTION AND VENUE

1. The Court has jurisdiction over the parties and the subject matter of this case. The Complaint states a claim upon which relief can be granted against Defendant under Chapter 6109 and Chapter 6111 of the Ohio Revised Code and the rules promulgated under those chapters. Venue is proper in this Court.

II. PARTIES

2. All terms and provisions of this Consent Order shall apply to and be binding upon Defendant and its assigns, successors in interest, agents, representatives, servants, employees, officers, directors, contractors, consultants, subsidiaries or divisions, and/or all persons, firms, or corporations who are or will be acting in concert or in privity with the Defendant. Defendant shall provide a copy of this Consent Order to each contractor and/or consultant Defendant employs to perform work which is itemized herein. Each contractor and/or consultant shall provide a copy of this Consent Order to each of its subcontractors for such work.

III. SATISFACTION OF LAWSUIT

3. Plaintiff alleges in its Complaint that Defendant has owned and/or operated its wastewater treatment plant and sewer system in such a manner as to result in numerous violations of the discharge limitations, monitoring and reporting requirements, in violation of Sections 6111.04 and 6111.07 of the Ohio Revised Code, the NPDES Permit issued to it by the Director of the Ohio Environmental Protection Agency (hereinafter referred to as "Ohio EPA"). In addition, Plaintiff alleges in its Complaint that Defendant has owned and/or operated its public drinking water plant in such a manner as to result in violations of Ohio Revised Code Section 6109.07 and Ohio Administrative Code (hereinafter referred to as "OAC") Chapter 3745-91-08 by making a substantial change to its public water system without obtaining a plan approval. Plaintiff alleges that Defendant violated OAC Chapter 3745-95 by failing to have a program in place to determine whether cross-connections exist that could allow the backflow of contaminants to enter the water system. In addition, Plaintiff alleges Defendant violated OAC 3745-81-86 for failure to monitor for lead and copper from June of 1995 through September of

1995. Compliance with the terms of this Consent Order shall constitute full satisfaction of any civil liability by Defendant for all claims under such laws alleged in the Complaint.

Nothing in this Consent Order shall be construed so as to limit the authority of the State of Ohio to seek relief, against Defendant or other appropriate persons, for claims or conditions not alleged in the Complaint, including violations which occur after the filing of the Complaint, nor shall anything in this Consent Order limit the right of Defendant to any defenses it may have for such claims. Similarly, nothing in this Consent Order shall be construed so as to limit the authority of the State of Ohio to undertake any action against any person, including Defendant, to eliminate or mitigate conditions which may present a threat to the public health, welfare or the environment and nothing in this Consent Order shall limit the rights of Defendant to any defenses it may have to such actions. Nothing in this Consent Order shall be construed as an admission of liability by Defendant.

IV. PERMANENT INJUNCTION

4. Defendant is hereby enjoined and ordered to immediately comply, unless otherwise provided herein, with the requirements of Chapters 6109 and 6111 of the Ohio Revised Code and the terms and conditions of the rules adopted under those Chapters, as well as the requirements of its currently effective National Pollutant Discharge Elimination System ("NPDES") permit No. OPD00014, and any renewals or modifications thereof. Defendant is immediately enjoined and ordered to properly operate and maintain pursuant to Ohio law, its wastewater treatment plant, sewer system, drinking water plant and any associated equipment and structures.

V. PUBLIC WATER SYSTEM OPERATOR IV -- COMPLIANCE SCHEDULE

5. Within thirty (30) days of the date of entry of this Consent Order the Defendant shall

employ or contract for a technical supervisor with Class IV Public Water System Operator certification. The technical supervisor will not be in responsible charge of the public water system, but will provide technical assistance for a minimum of twenty (20) hours per week, to the person designated by Defendant at that time as in responsible charge of the public water system. The person designated as being in responsible charge for the public water system must at a minimum have Class III Public Water System Operator certification. Once the Defendant has complied with the requirements set forth in paragraph six of this Consent Order, the Defendant shall no longer be required to employ a technical supervisor.

6. Within Six (6) months of the date of entry of this Consent Order the Defendant shall place the responsibility for the technical operation and maintenance of Defendant's public water system under the daily responsible charge of at least one (1) full-time employee who possesses valid certification as a Public Water System Operator IV or at least one (1) full-time employee who possesses that level of certification necessary to comply with Chapter 3745-7 of the Ohio Administrative Code.

7. The certified operator shall be in responsible charge on site at the Defendant's water treatment plant to ensure that the plant and the remainder of the public water system are operating satisfactorily. The certified operator also shall be available twenty -four (24) hours a day, seven (7) days a week for emergency assistance. On or before September 1, 1998, the Defendant will indicate in writing to Ohio EPA's Southeast District Office who their certified operator(s) will be for their drinking water treatment plant.

8. The certified operator(s) shall be in charge of the Defendant's water treatment plant shall, at a minimum:

- a. prepare and implement an operational and staffing plan for the treatment plant and distribution system;
- b. plan, schedule and direct the operations and maintenance of the treatment plant;
- c. prepare and update an emergency operations contingency plan;
- d. develop a water quality assurance plan and procedure and ensure that plant personnel adhere to such plan and procedure, i.e., chemical and bacteriological examinations at various stages of the treatment and in the distribution system;
- e. supervise the requisitioning and accounting for the purchase of equipment and supplies used in treatment plant and distribution operations;
- f. advise and assist in the design and installation of pumps, machinery and other equipment;
- g. ensure that an ample supply of chemicals is maintained at all times;
- h. ensure that chemical feeders are calibrated and that the proper amount of chemical is being fed at all times;
- i. investigate and take appropriate action to resolve water system customer complaints;
- j. make recommendations for improving the plant performance and operation by conferring with engineers and others regarding the efficiency and economy of plant operation;
- k. prepare and submit to the City a monthly activity report outlining the accomplishments and goals set or met for the month;
- l. establish a water quality compliance testing schedule for the system;

- m. set-up a safety and training program for water system employees;
- n. develop an operations and maintenance manual;
- o. complete and submit all operational and compliance reports required by Ohio laws, regulations and drinking water policy.
- p. set-up a training and operator certification program to assist all operators in becoming certified;
- q. ensure the required chlorine residual is maintained throughout the distribution system;
- r. ensure the required minimum pressure is maintained throughout the distribution system;
- s. implement a backflow prevention program;
- t. ensure new or repaired water mains are properly disinfected and that microbiological samples are collected and analyzed to confirm disinfection; and
- u. advise and assist in the design and installation of distribution facilities.

VI. WASTE WATER SYSTEM OPERATOR IV -- COMPLIANCE SCHEDULE

9. Within thirty (30) days of the date of entry of this Consent Order the Defendant shall employ or contract for a technical supervisor with Class IV Waste Water System Operator certification. The technical supervisor will not be in responsible charge of the public water system, but will provide technical assistance for a minimum of twenty (20) hours per week, to the person designated by Defendant at that time as in responsible charge of the waste water system. The person designated as being in responsible charge for the waste water system must at

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a minimum have Class III Waste Water System Operator certification. Once the Defendant has complied with the requirements set forth in paragraph ten of this Consent Order, the Defendant shall no longer be required to employ a technical supervisor.

10. Within Six (6) months of the date of entry of this Consent Order, Defendant shall place the responsibility for the technical operation and maintenance of Defendant's public wastewater system under the daily responsible charge of at least one (1) full-time employee who possesses valid certification as a Waste Water System Operator IV in compliance with Chapter 3745-7 of the OAC.

11. The certified operator(s) in charge also shall be available twenty-four (24) hours a day, seven (7) days a week for emergency assistance. On or before September 1, 1998, the Defendant will indicate in writing to Ohio EPA's Southeast District Office who their certified operator(s) will be for their waste water treatment plant.

12. Defendant shall submit documentation, including but not limited to an copy of the job description of the certified operator, to the Ohio EPA Division of Surface Waters, 1800 WaterMark Drive, Columbus, Ohio 43216-1049, to the attention of Randy Bournique or his successor, by June 1, 1998.

13. The Defendant shall submit, within Eighteen (18) months of the effective date of this Consent Order, a revised Operation and Maintenance (O&M) Manual covering Defendant's waste water treatment plant, to the Southeast District Office of Ohio EPA. The revised manual shall update all of the sections in the existing O&M Manual with specific attention to the following:

a) flow monitoring equipment

- b) sampling equipment
- c) sludge handling equipment
- d) emergency equipment

VII. NPDES PERMIT -- SCHEDULE FOR COMPLIANCE

14. Defendant is enjoined and ordered to meet the final effluent limitations for fecal coliform, mercury, and all other effluent limitations as set forth in its NPDES Permit No. OPD00014 and any renewals or modifications thereof by September 1, 1998.

15. Defendant is immediately enjoined and ordered to properly monitor combined sewer overflows (hereinafter referred to as "CSO") pursuant to its NPDES permit No. OPD00014, page M9, Part II, §§ D and E.

16. Defendant is enjoined and ordered to attain compliance with the terms and conditions of its NPDES permit not later than the dates set forth in the following schedule:

(a) By November 1, 1999 Defendant shall develop and submit to the Southeast District Office for approval two copies of a Combined Sewer System Operational Plan. The Plan shall outline in detail the procedures used to ensure that the collection system is adequately maintained and the steps taken to ensure that the frequency, duration, and volume of flow, and the pollutant loads discharged from the CSOs are minimized. When the Plan is approved, the Defendant shall operate and maintain the combined sewer system in accordance with the approved plan. Items included in Ohio EPA's "Checklist for Adequacy of Combined Sewer System Operational Plans" (12-27-93) must be considered in developing the Plan and addressed if they are applicable. The degree of detail that is required in a Plan is variable, depending on the complexity of the combined sewer system.

(b) By May 1, 2000 the Defendant is required to implement the minimum control measures identified by U.S. EPA as BCT/BAT for CSOs that are applicable to its system, which includes the following:

1. Proper operation and regular maintenance programs for the sewer system and CSO points;
2. Maximum use of the collection system for storage;
3. Review and modify local programs to minimize the impact of non-domestic discharges from combined sewer overflows;
4. Maximization of flow to POTW for treatment;
5. Prohibition of dry weather overflows;
6. Control of solid and floatable materials in CSO discharges;
7. Required inspection, monitoring and reporting of CSOs;
8. Pollution prevention programs that focus on contaminant reduction activities; and
9. Public notification for any areas affected by CSOs, especially beach and recreational areas.

Section IV of the "Checklist for Adequacy of Combined Sewer System

Operational Plans " applies specifically to the minimum controls.

(c) By November 1, 1999, the Defendant shall submit a report to Southeast District Office to evaluate which of the nine minimum controls are applicable. If a minimum control does not apply, this must be explained. A description of how the Defendant will comply with the applicable controls and the current status of implementation shall be included. The Plan also shall include a fixed date schedule of compliance for implementing the controls that are not fully in place. When approved, this schedule shall be incorporated by reference as part of Defendant's permit.

(d) As part of the operation plan, the Defendant shall study the weir settings at each of the combined sewer overflow structures to determine if they are properly adjusted. The Defendant shall take into consideration in adjusting the weirs the pollutant loading from each tributary

combined sewer area in proportion to the wet weather flow from the tributary area. The weirs shall be adjusted to maximize the pollutant loading from the entire collection system to be transported to the treatment plant. The Defendant shall make sure that combined sewer areas with low pollutant loadings in relation to wet weather flow volumes have weirs properly adjusted so as not to take up unnecessary capacity needed to transport pollutant loadings from other combined sewer areas and separate sewer areas.

NOTE: Two guidance documents are available from U.S. EPA Region V: "Technical Guidance for Use in the Development of a Combined Sewer System Operational Plan" (September, 1986) and "Example of a Combined Sewer System Operational Plan" (June, 1990). Guidance on implementing the nine minimum controls is in U.S. EPA's "Minimum Control Measures for Combined Sewer Overflow" (1994). Ohio EPA can assist in obtaining these documents.

(e) By August 1, 1998 the Defendant shall submit to the Southeast District Office for approval, two copies of a proposal for a monitoring program that satisfies the following objectives:

1. Provides adequate data to characterize and model the collection system and combined sewer overflows;
2. Supports development and implementation of the minimum control measures for CSOs;
3. Allows the effectiveness of the minimum control measures to be evaluated.

Characterization includes developing an understanding of the collection system and how it responds to a variety of rain events: Identifying separate sewer areas, tributary to combined sewer overflows, and determining the impacts on CSOs (including any separate areas with excessive inflow or infiltration); identifying sources of toxic and hazardous pollutants and

estimating the loads entering the combined sewer system; determining the frequency and volume of overflows; and determining the concentrations of loadings of pollutants being discharged. For small, relatively simple collection systems, monitoring data alone may provide adequate characterization, and modeling might not be necessary.

(f) By March 31, 2000 the Defendant shall submit to the Southeast District Office two copies of a report on the characterization of the collection system and the combined sewer overflows.

(g) By August 1, 1998, the Defendant shall submit to the Southeast District Office for approval two copies of a detailed plan of study for conducting wet weather stress testing of the Steubenville WWTP. The purpose of the stress testing is to maximize wet weather combined sewer flow to the treatment plant that receives full treatment without washing out the system or rendering it inoperable.

(h) By July 1, 2000 the Defendant shall complete wet weather stress testing.

Ohio EPA acknowledges that some violations of permit limits may occur during the stress testing as the limits of operation are determined.

(i) By September 30, 2000 the Defendant shall submit to the Southeast District Office two copies of a report on the results of the wet weather stress testing. This report shall include, at a minimum, the following elements:

1. Documentation of the maximum wet weather flow that can receive full treatment without washing out the system or rendering it inoperable.
2. Documentation of the minimum wet weather flow that the plant is capable of treating at all times.

After the results of the study are approved by the Ohio EPA, the Defendant's NPDES permit will

be modified. The loading limits for total suspended solids and CBOD5 may be based on the flow value identified in paragraph 14(g) of this Consent Order.

(j) By September 1, 2000 the Defendant shall submit the results of a study characterizing the fecal coliform levels in the Ohio River upstream and downstream of its combined sewer overflow discharges. Sampling shall be conducted during the summer months, May through October.

1. Baseline bacterial sampling shall be conducted during dry weather periods when there has been no rainfall during the preceding 72 hours. The study shall include dry weather data from at least 10 days.

2. Wet weather sampling shall be conducted following three rain events during which combined sewer overflows occur. Sampling should occur only if the rainfall volume exceeds 0.1 inches, and, if possible the rain events should vary in magnitude and duration. Wet weather sampling shall begin on the day the rain event and continue for the next three days. At least one sample shall be collected each day.

3. The upstream sampling point shall be on the Ohio River above all of the Defendant's combined sewer overflows. The downstream sampling point shall be on the Ohio River below all of the Defendant's combined sewer overflows, and, if possible above the wastewater treatment plant outfall.

4. Samples for this study shall be collected as grab samples.

5. Results reported to Ohio EPA shall include a description of the TWO sampling locations, the date and time when samples were collected, a description of the sampling procedure, the analytical results, and for wet weather sampling, the inches and duration of the preceding rainfall.

6. Based on the results of the instream bacteria study, this permit may be modified to require the Defendant to develop controls to ensure that these water attain the applicable water quality standards for bacteria when contact recreation is occurring. This would include a proposal for notifying the public when elevated bacteria levels may endanger public health.

(k) By August 1, 1998 Defendant shall submit an approvable sludge management plan with

six copies to the Southeast District Office of the Ohio EPA. This plan shall describe in detail the method or methods the entity intends to employ for the disposal or reuse of the sewage sludge generated by the facility.

(l) By November 30, 1998 Defendant shall submit a report on the collection system to Ohio EPA's Southeast District Office. The report must describe the improvements made to the collection system since the completion of the 1982 Sewer System Evaluation Survey (SSES), including improvements made specifically to address infiltration and inflow in the separate collection system. The report must list any other needed improvements to the collection system, including additional improvements that are needed to address infiltration and inflow in the separate collection system, and a schedule for completing these improvements.

(m) By November 1, 1998, Defendant shall complete all improvements necessary to eliminate dry weather overflows at combined sewer overflow OPD00014003 (Stony Hollow regulator) and of any other combined CSO's listed in the effective NPDES permit.

(n) By October 30, 1998, Defendant shall submit an appropriate permit to install (PTI) application for disinfection facilities (for example ozonation, ultraviolet, chlorination, dechlorination, etc.) to meet final table effluent limitations contained in this permit for outfall OPD00014001 and OPD00014002.

(o) By April 1, 1999, Defendant shall submit an appropriate permit to install (PTI) application to upgrade all of its lift stations in the Collection System to meet Ten State Standards.

VIII. SLUDGE HANDLING FACILITIES - SCHEDULE FOR COMPLIANCE

17. By December 1, 1998, Defendant shall submit a General Plan for improvements to its

sludge handling facilities, to attain and maintain compliance with R.C. Chapter 6111. The plan shall include a fixed incremental date schedule to comply with the permit as soon as possible. At a minimum, this schedule shall include the dates for submission of approvable detail plans and specifications to Ohio EPA; bid advertisement; bid award; start and completion of any construction; and achievement of permit compliance.

18. By May 1, 1998, Defendant shall submit a detailed description of the City's interim sludge operations for handling and disposal of sludge generated at Defendant's Waste Water Treatment Plant.

**IX. FILTER BACKWASH RECYCLING SYSTEM PLAN APPROVAL --
SCHEDULE FOR COMPLIANCE**

19. Within thirty (30) days of the date of entry of this Consent Order Defendant shall submit, pursuant to OAC Chapter 3745-91, to the Ohio EPA, Southeast District Office, Division of Drinking and Ground Water, 2195 Front Street, Logan, Ohio 43318, to the attention of Janet Barth, the detail plans for the filter backwash recycling system which already has been installed at its drinking water treatment plant.

20. If the Ohio EPA does not approve the plans for the existing filter backwash recycling system, the Defendant agrees to make any and all changes and/or modifications to the detail plans required by Ohio EPA for approval of the plans. The Defendant shall submit revised plans within Six (6) months of notification of deficiencies. If Defendant decides to remove the filter backwash recycling system, plans for the removal must be submitted to Ohio EPA, Southeast District Office, Division of Drinking and Ground Water, 2195 Front Street, Logan, Ohio 43318, to the attention of Janet Barth, within sixty (60) days of the decision to disable the system.

21. Within six (6) months of receipt of the plan approval from the Ohio EPA Defendant shall complete modifications to its backwash recycling system or remove it in accordance with the approved plan.

X. BACKFLOW PREVENTION PROGRAM -- SCHEDULE FOR COMPLIANCE

22. By May 1, 1998, the Defendant shall submit to Ohio EPA, Southeast District Office, for review an effective backflow prevention plan for its public water system as to be determined by Ohio EPA in accordance with OAC Chapter 3745-95. At a minimum the backflow prevention program shall include the determination and elimination of all cross connections, the determination of what customers require backflow prevention devices, the authority to require the installation of backflow prevention devices, the authority to disconnect any service connection which could pose a hazard to human health and the environment due to inadequate backflow prevention, and the authority to ensure the annual inspection of all backflow prevention devices. The Defendant shall implement the backflow prevention program within thirty (30) days of Ohio EPA's review and approval of the program in accordance with OAC Chapter 3745-95.

XI. MONITORING AND REPORTING OF LEAD AND COPPER

23. Defendant shall monitor its public drinking water system for lead and copper pursuant to OAC Rule 3745-81-86.

XII. SUBMITTAL OF DOCUMENTS

24. For any plan required for review and approval by Ohio EPA under this Consent Order the

Defendants shall have thirty (30) days to fully respond in writing to any comments, suggestions, or noted deficiencies provided to Defendant by Ohio EPA.

XIII. CIVIL PENALTY

25. It is hereby ordered that the Defendant shall pay to the State of Ohio a civil penalty of Ninety Three Thousand Seven Hundred Fifty and 00/100 (\$93,750) dollars. The penalty shall be paid by delivering to counsel for Plaintiff a certified check for that amount, payable to the order of "Treasurer, State of Ohio", which check shall be delivered by mail, or otherwise, to Jena Suhaldonik, Administrative Assistant, or her successor, Environmental Enforcement Section, 30 East Broad Street, 25th Floor, Columbus, Ohio 43215-3428, within forty-five (45) days from the date of entry of this Consent Order.

XIV. SUPPLEMENTAL ENVIRONMENTAL PROJECT

26. In lieu of additional civil penalty, and in furtherance of the mutual objectives of the State of Ohio and the City of Steubenville in improving the waters of the State and the environment, Defendant City of Steubenville agrees to waive tap-in fees (estimated at \$125.00 per household) for the estimated fifty (50) homes in the Permar's Run area in order to allow those homes to connect to the new sewer line that the City is constructing in that area. The City has agreed that within two years of the date of entry of this Consent Order, it will make any necessary modifications, including passing an ordinance, in order to allow the residents in the Permar's Run area connect to the existing sewer system or a new sewer line once constructed.

XV. STIPULATED PENALTIES

27. In the event that Defendant fails to meet any of the deadlines and/or requirements of this Consent Order set forth in Paragraphs four (4), through twenty-four (24), the Defendant shall immediately and automatically be liable for and shall pay a stipulated penalty according to the following payment schedule.

(a) For each day of each failure to meet a deadline and/or requirement, up to thirty (30) days - One Hundred Fifty Dollars (\$150.00) per day for each deadline and/or requirement not met.

(b) For each day of each failure to meet a deadline and/or requirement, from thirty-one (31) to sixty (60) days - Three Hundred Dollars (\$300.00) per day for each deadline and/or requirement not met.

(c) For each day of each failure to meet a deadline and/or requirement, over sixty-one days (61) - FiveHundred Fifty Dollars (\$550.00) per day for each deadline and/or requirement not met.

28. Any payment required to be made under the provisions of Paragraph 27 of this Order shall be made by delivering to Plaintiff's counsel, in the manner provided for in paragraph 25 of this Consent Order, in the appropriate amounts, within thirty (30) days from the date of the failure to meet the requirement of the Consent Order, made payable to the order of "Treasurer, State of Ohio".

XVI. COMPLIANCE NOT DEPENDENT ON GRANTS OR LOANS

29. Performance of the terms of this Consent Order by Defendant are not conditioned on the receipt of any Federal or State grant or loan funds. In addition, Defendant's performance is not excused by the failure to obtain any Federal or State grant or loan funds, or by the processing of any applications for the same.

XVIII. RETENTION OF JURISDICTION

30. The Court will retain jurisdiction of this action for the purpose of enforcing Defendant's compliance with this Consent Order.

XIX. COSTS

31. Defendant City of Steubenville is hereby ordered to pay the court costs of this action.

XX. ENTRY OF CONSENT ORDER AND FINAL JUDGEMENT BY CLERK


32. The parties agree and acknowledge that final approval by the Plaintiff and Defendant, City of Steubenville and entry of this Consent Order is subject to the requirement of 40 C.F.R. §123(d)(1)(iii), which provides for notice of the lodging of this Consent Order, opportunity for public comment, and the consideration of any public comment. Both the State and Defendant, City of Steubenville reserve the right to withdraw this Consent Order based on comments received during the public comment period.

33. Pursuant to Rule 58 of the Ohio Rules of Civil Procedure, upon signing of this Consent Order by the Court, the clerk is hereby directed to enter it upon the journal. Within three (3) days of entering the judgment upon the journal, the clerk is hereby directed to serve upon the parties notice of the judgment and its date of entry upon the journal in the manner prescribed by

Rule 5(B) of the Ohio Rules of Civil Procedure and note the service in the appearance docket.

IT IS SO ORDERED:

April 22, 1998
DATE

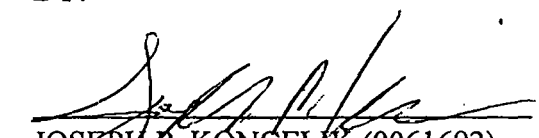


JUDGE, COURT OF COMMON PLEAS
JEFFERSON COUNTY, OHIO


APPROVED:

STATE OF OHIO, ex rel.
BETTY D. MONTGOMERY
ATTORNEY GENERAL OF OHIO
BY:

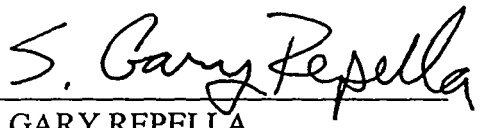
CITY OF STEUBENVILLE



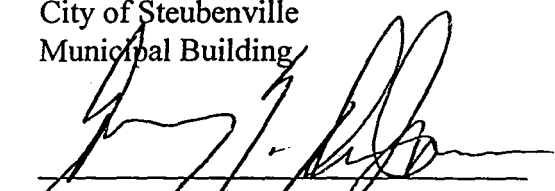
JOSEPH P. KONCELIK (0061692)
BOB KARL (0042293)
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Columbus, Ohio 43215-3428



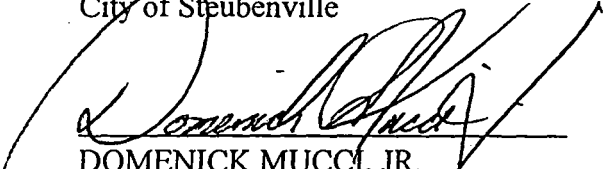
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S. GARY REPELLA
Director of Law
City of Steubenville
Municipal Building



GARY DUFOUR
City Manager
City of Steubenville



DOMENICK MUCCI, JR.
Mayor
City of Steubenville