

**AGENCY OF NATURAL RESOURCES
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
1 NATIONAL LIFE DRIVE, MAIN 2
MONTPELIER, VERMONT 05620-3521**

**DRAFT INDIRECT
DISCHARGE PERMIT**

Permit No.: ID-9-0278
PIN: BR97-0286

SECTION A - "ADMINISTRATION"

In compliance with provisions of 10 V.S.A. §1263, and in accordance with the following conditions, the permittee:

Town of Warren
P.O. Box 337
Warren, Vermont 05674

is authorized to discharge treated domestic sewage from a subsurface disposal system located at Brooks Field serving various homes and commercial properties located in Warren, Vermont, to groundwater and indirectly into the Mad River and an unnamed tributary of the Mad River.

This is a permit renewal.

A1. Permit Summary:

Expiration Date	September 30, 2022
Type of Waste	Treated Domestic Sewage
Treatment System	Septic Tank
Disposal System	Leachfield trenches
Drainage Basin	Winooski River
Constructed Design Capacity	30,000 gallons per day
Permitted Disposal Capacity	20,000 gallons per day
Receiving Waters	Mad River Unnamed Tributary of Mad River
Drainage Areas	
Mad River	Approx. 37.9 sq. mi.
Unnamed Tributary	Approx. 0.22 sq. mi.
Low Median Monthly Stream Flow (LMMF)	
Mad River	Approx. 19.3 c.f.s. (12,492,000 gpd)
Unnamed Tributary	Approx. 0.047 c.f.s. (31,300 gpd)
Dilution Ratio (at LMMF)	
Mad River	2498 : 1 (assumes 5,000 gpd discharge)
Unnamed Tributary	2 : 1 (assumes 15,000 gpd discharge)

A2. Compliance Schedule:

The following schedule summarizes the actions and requirements necessary for compliance with the conditions of this permit. The permittee shall complete the requirements in accordance with the dates indicated. See the designated section for specific details.

<u>Condition # & Description</u>	<u>Schedule Date</u>
A3. Apply for renewal of Indirect Discharge Permit	June 30, 2022
A14. Submit calculation of uncommitted reserve capacity	Annually by May 15th
D2(A). Have a Vermont Registered Professional engineer complete an inspection of sewage treatment and disposal system	Annually in April
D2(B). Submit Annual Inspection Report	Annually by July 1st
D2(C). Submit Schedule for implementing engineer's recommendations	Annually by August 1st
D3. Notify Secretary of pumping of tanks and septage disposal	As specified
E2. Sample and analyze septic tank effluent	June, August and October
E3. Sample and analyze groundwater	June, August and October
E4. Sample and analyze surface water	June, August and October

A3. Expiration Date:

This permit, unless revoked, or amended shall be valid until September 30, 2022 despite any intervening change in Water Quality Standards or the classification of receiving waters. Renewal of this Indirect Discharge permit will be subject to all rules applicable at the time of renewal, including biological standards to determine significant alteration of aquatic biota, if applicable.

The permittee should apply for an Indirect Discharge Permit renewal by June 30, 2022 for continued authorization to discharge treated domestic wastewater. For the purposes of Title 3, an application for renewal of this indirect discharge permit will be considered timely if a complete application is received by the expiration date.

A4. Effective Date:

This permit becomes effective on the date of signature.

A5. Revocation:

The Secretary may revoke this permit in accordance with 10 V.S.A. §1267.

A6. Transfer of Permit:

This permit is not transferable without prior written approval of the Secretary. The permittee shall notify the Secretary immediately, in writing, before any sale, lease or other transfer of ownership of the property from which the permitted discharge originates. The proposed transferee shall make application for a permit to be reissued in their name. Failure to apply shall be considered a violation of this permit. Responsibility for compliance with the conditions of this permit shall be the burden of the permittee until such time as transfer of the permit to the transferee is complete. All application and operating fees must be paid in full prior to transfer of this permit.

This permit shall be transferred only upon showing by the permittee or proposed transferee of compliance with the following conditions:

- a. The transferee shall be a legal entity, financially and technically competent to operate, inspect, maintain and replace the systems.
- b. The transferee shall demonstrate that it has the legal authority to raise revenues for the proper operation, inspection, and maintenance of the system.
- c. The transferee shall provide a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee to the Secretary.

A7. Minor Modifications of Permit:

The Secretary may modify this permit without requiring a permit application, a public notice, or a public hearing to correct typographical errors, or to increase the monitoring frequency in accordance with Condition E(6) of this permit.

A8. Indirect Discharge Rules:

This indirect discharge was originally reviewed and qualified for an Indirect Discharge Permit in accordance with Sections 14-402, 14-906, 14-1802 and 14-1803 of the Indirect Discharge Rules for new indirect discharges of sewage. A Wastewater System and Potable Water Supply Permit and possibly amendment of this permit will be required for any new connections to the sewage collection, treatment and disposal system.

A9. Right of Department to Inspect:

The permittee shall allow the Secretary or the Secretary's authorized representative upon the presentation of their credentials and at reasonable times:

- a. To enter upon permittee's premises in which any effluent source, treatment or disposal system is located or in which any records are required to be kept under the conditions of the permit;
- b. To have access to and copy any records required to be kept under conditions of this permit;
- c. To inspect any monitoring equipment or method required in this permit;
- d. To sample any discharge of waste, groundwater or surface water; and
- e. To inspect any collection, treatment, pollution management and disposal facilities required by this permit.

A10. Permit Availability:

A copy of this permit shall remain at the office of the permittee and upon request shall be made available for inspection by the Secretary.

A11. Minor Modifications to System:

Minor modifications of the engineering design which do not reduce the treatment effectiveness or increase the capacity of the system may be approved in writing by the Secretary without permit amendment.

A11. Minor Modifications to System (continued):

Before making modifications to the treatment and/or disposal system the permittee shall submit plans to the Secretary for review and approval. These plans must be approved before any of the modifications or additions are made.

A12. Correction of Failed System:

The Secretary may, upon discretion, issue an Amendment to the Indirect Discharge Permit for the design and reconstruction of a failed wastewater disposal system where the replacement system design was not previously approved. Before reconstruction of the failed system the permittee shall submit plans to the Secretary for review and approval. These plans must be approved before any reconstruction occurs. Due to the urgency of the need to correct failed disposal systems, the Secretary will process these Amendments as soon as possible.

A13. Operating Fees:

This indirect discharge is subject to operating fees. The permittee shall submit the operating fees in accordance with procedures provided by the Secretary.

A14. Calculation of Uncommitted Reserve Capacity:

By May 15th each year, the permittee shall submit a letter to the Secretary listing those facilities which were approved for connection to the sewage collection, treatment and disposal system during the previous twelve months and the approximate date of the connection of those facilities.

By May 15th each year, the permittee shall calculate the 95th percentile maximum day flow for the previous 24-month period, and using that flow, calculate the reserve capacity and uncommitted reserve capacity of the system. The permittee shall submit those calculations to the Secretary with the letter referenced above.

For calculation of reserve and uncommitted reserve capacity, the permittee shall use the following formulas:

$$\text{Reserve Capacity (gpd)} = 20,000 \text{ gpd} - \text{Max Day Flow (95}^{\text{th}} \text{ percentile)}$$

$$\text{Uncommitted Reserve Capacity (gpd)} = \text{Reserve Capacity (gpd)} - \text{Approved connections connected for less than 6 months (gpd)}$$

SECTION B "INDIRECT DISCHARGE"

B1. Location of Indirect Discharge:

This existing indirect discharge is located in the Winooski River drainage basin in the Town of Warren, Vermont. The indirect discharge can be located on the USGS, Warren, Vermont 7.5' quadrangle map approximately at Latitude N 44° 07' 04" and Longitude W 72° 51' 11".

B2. Nature of Indirect Discharge:

The sewage collection system for the Town of Warren consists of a network of septic tank effluent pumping systems (STEP systems) and gravity sewers supplemented by pump stations. For Phase I there are two main pump stations in the collection system; the Flat Iron Road Pump Station and the Village Pump Station. The former pumps into the gravity sewer system which, in turn, is pumped to the Brooks Field septic tanks by the Village Pump Station. The STEP system low pressure sewers join the force main which transmits septic tank effluent to the Brooks Field septic tanks, bypassing the gravity sewer system entirely.

The force main from the Village Pump Station discharges into the first cell (compartment) of a five cell, 50,000 gallon septic tank at Brooks Field. Several of the cells of the septic tank can be bypassed to facilitate cleaning and pumping of sludge and scum. The existing septic tanks at Brooks Field, previously permitted under WW-5-1077, have been converted into emergency storage tankage. The septic tank discharges to the existing Pump Station #1, a duplex unit which is interconnected with the new Pump Station #2 which contains ten pumps. There are twelve 5,000 gallons per day (gpd) leachfields in the disposal area, including six primary fields and six alternates. Pump Station #1 discharges to Fields #1 and #2 and the new Pump Station #2 discharges to Fields #3 through #12. The disposal fields are trench leachfields, each with fourteen 100-foot-long and 4-foot-wide trenches for a total application area of 5,600 square feet. The application rate is 0.9 gpd per square foot. The effluent discharged to the leachfields will infiltrate through the soil to groundwater beneath the disposal area. Groundwater in the area flows to either the Mad River or an unnamed tributary to the Mad River.

SECTION C "SYSTEM APPROVALS"

C1. Approved Plans – Contract No. 1:

The construction of the sewage treatment and disposal system for the Town of Warren, Vermont was completed substantially in accordance with the following plans and specifications prepared by Donald Phillips, P.E., of Forcier Aldrich & Associates:

Sheet #	Description	Date	Revised
2	General Location Plan	5/02	12/02
3	General Notes and Legend	5/02	
4	Main Street North - Plan and Profile - Station 0+00 to 7+00	5/02	
5	Brook Road - Plan and Profile - Station 0+00 to 2+47	5/02	
6	Flat Iron Road/Brook Road – Plan and Profile - Station 0+00 to 5+48	5/02	2/03
7	Brook Road - Plan and Profile- Station 5+48 to 11+15	5/02	2/03
8	Gratton Drive - Plan and Profile - Station 0+00 to 9+22	5/02	2/03
10	Main Street South - Plan and Profile - Station 0+00 to 7+00	5/02	
11	Main Street South - Plan and Profile - Station 7+00 to 15+48	5/02	
12	Covered Bridge Road and Mill Road - Plan and Profile - Station 0+00 to 6+92	5/02	2/03
13	Covered Bridge Road to Route 100 - Plan and Profile - Station 0+00 to 5+00	5/02	2/03
14	Site Plan Service Connections to Existing Sewers/Main Street Low Pressure Sewer	5/02	12/02
15	Main Street Bridge Crossing and Low Pressure Sewer Profile - Station 0+00 to -5+50	5/02	2/03
16	Flat Iron Road Pump Station - Site Plan, Electrical and Details	5/02	2/03
17	Village Pump Station Upgrade – Plan, Sections and Details	5/02	3/03
18	Brooks Field Overall Site Plan	5/02	12/02
19	Brooks Field Disposal System Site Plan	5/02	12/02
20	Brooks Field Septic Tank Process and Emergency Storage Tanks, Plans, Sections and Details	5/02	12/02
21	Brooks Field Pump Station Improvements	5/02	12/02
22	Brooks Field Wastewater Disposal System - Sections and Details	5/02	12/02
25	Gravity Sewer Details	5/02	
26	STEP System, Low Pressure Sewers, Force Main and Miscellaneous Details	5/02	1/03
28	Brook Road Bridge Crossings Plan, Elevation and Details	5/02	2/03
29	Roadway, Grinder Pump and Miscellaneous Details	5/02	12/02

C1. Approved Plans – Contract No. 1 (continued):

and the document “Town of Warren Decentralized Wastewater Improvement Project - Contract No. 1 -- May 2002;” which were stamped “APPROVED” by the Department of Environmental Conservation. No changes shall be made to the approved plans and documents without the prior written approval of the Secretary.

C2. Approved Plans – Contract No. 2:

The construction of the collection and treatment system for Contract No. 2 for the Town of Warren, Vermont was completed substantially in accordance with the following plans and specifications prepared by Forcier Aldrich & Associates:

Sheet #	Description	Date
2	General Location Plan	3/03
3	General Notes and Legend	3/03
4	Main Street North/Route 100 - Plan and Profile - - Station 0+00 to 8+00	3/03
4A	#52 Main Street Plan	3/04
5	West Hill Road - Plan and Profile - Station 8+00 to 11+77	3/03
6	Trout Hollow Road – - Plan and Profile - Station 0+00 to 5+00	3/03
7	Trout Hollow Road - Plan and Profile - Station 5+00 to 8+30	3/03
8	Main Street South - Plan and Profile - Station 0+00 to 8+00	3/03
9	Main Street South - Plan and Profile - Station 8+00 to 15+00	3/03
10	Main Street Bridge Crossing- Plan, Elevation, Section and Details	3/03
11	West Hill Road Stream Crossing Plan, Profile and Details	3/03
22A	Veralli STEP System	3/03
24	STEG and Gravity Sewer Service Details	3/03
25	STEP System Details	3/03
26	Forcemains, Low Pressure Sewers and Cleanout Manholes	3/03
27	Septic Tanks and Distribution Boxes Plans Sections and Details	3/03
33	Main Street Bridge Crossing Support Structure Plan and Details	3/03

and the documents entitled “Town of Warren Decentralized Wastewater Improvement Project Contract No. 1 and No. 2 – Basis For Final Design – May 2002, Amendment No. 1 – December, 2002, Amendment No. 2 – July, 2003” and “Town of Warren Decentralized Wastewater Improvement Project - Contract No. 2 – March 2003” which were stamped “APPROVED” by the Department of Environmental Conservation. No changes shall be made to the approved plans and documents without the prior written approval of the Secretary.

C3. Variances:

Due to site constraints including bedrock outcrops, required separation to wells and proximity to streams, the following properties were granted a variance from the required setback distance of ten feet from septic tanks/pump stations to the top of bank or slope greater than 30%:

- Johannesen Property (Contract No. 2; Drawing #4)
- Larock Property (Contract No. 2; Drawing #5)
- Paquin Property (Contract No. 2; Drawing #5)
- Macissac Property (Contract No. 2; Drawing #7)
- Detton Property (Contract No. 2; Drawing #9)

When installing the tankage, the permittee was required to maximize the setback distance from the top of bank or slope greater than 30% and take all necessary steps to ensure that the site is stabilized against future erosion.

C4. Approved Plans – Reconstruction of Field No. 1:

The reconstruction of Field No. 1 at Brooks Field for the Town of Warren, Vermont was completed substantially in accordance with the following plans and specifications prepared by Forcier, Aldrich & Associates:

Drawing #	Description	Date
1.	Disposal Field No. 1 Refurbishment Site Plan	Feb. 2004
2.	Disposal Field No. 1 Refurbishment Piping Plan	Feb. 2004
3.	Disposal Field No. 1 Refurbishment Sections	Feb. 2004
4.	Disposal Field No. 1 Refurbishment Construction Notes	Feb. 2004
5.	Disposal Field No. 1 Sieve Requirements	Feb. 2004

SECTION D "SYSTEM OPERATION"

D1. General Operating Requirements:

The sewage treatment and disposal system shall be operated at all times in a manner that will: (1) not permit the discharge of sewage onto the surface of the ground; (2) not result in the surfacing of sewage; (3) not result in the direct discharge of sewage into the waters of the State; (4) not result in a violation of the Vermont Water Quality Standards and (5) not cause a significant alteration of the aquatic biota in the receiving waters.

In accordance with accepted design practices, the effluent disposal rate to the disposal fields shall not exceed 20,000 gallons per day except as may occur on an occasional basis during normal operation.

D2. Annual Inspection, Report and Implementation Schedule:

(A) Annual Inspection:

Annually during the month of April, the permittee shall engage a Vermont Registered Professional engineer to make a thorough inspection, evaluation and report of the complete sewage collection, treatment and disposal system. The engineer's inspection shall include, but not be limited to the following:

1. inspecting the entire collection system, removing manhole covers to observe the condition of the gravity sewers, septic tanks, and manholes, including air release, valve and cleanout manholes, and noting any signs of inflow or excess infiltration; approximately one-third of the gravity sewer manholes shall be inspected each year with every gravity sewer manhole inspected at least once in a three-year period;
2. evaluating the accumulation of solids and scum in all septic tanks and STEP pump tanks and verifying the pumping of these structures, if necessary. The Town's designated system operator may check the sludge and scum levels in each STEP tank prior to the date of the inspection and report those measurements to the engineer for inclusion in the annual inspection report;
3. reviewing the records of inspections of the STEP systems and individual grinder pump stations (if applicable) conducted during the previous year by Town of Warren personnel;
4. checking the proper operation of all pumps, alarms and controls in the Flat Iron Pump Station, Village Pump Station, and all grinder pump stations (as applicable);
5. checking all septic tank effluent filters and evaluating if they need cleaning or replacement;
6. checking the proper operation of all pumps, alarms and controls for Brooks Field Pump Stations #1 and #2
7. checking the calibration of the six magnetic flow meters;
8. checking the depth of ponding in all shallow in-field observation wells for the fields in use at the time;
9. verifying the alternation of the fields; and
10. noting any necessary repairs or maintenance that needs to be performed on the sewage collection, treatment, and disposal system.

D2. Annual Inspection, Report and Implementation Schedule (continued):

(B) Annual Inspection Report:

By July 1st each year, the permittee shall have a professional engineer submit an annual report including the following items:

1. a complete list of the items inspected and the results of the inspection;
2. an evaluation of the degree of ponding observed in the shallow in-field observation wells;
3. a tabulation of the depth to groundwater (below ground surface) in the groundwater monitoring wells;
4. the measured depths of scum and sludge in all cells (compartments) of the 50,000 gallon septic tank; and
5. a discussion of the recommended repairs and maintenance required.

(C) Implementation Schedule:

By August 1st each year, the permittee shall notify the Secretary in writing stating how the engineer's recommendations were or are to be implemented, including a schedule for the required repair and maintenance items which have not yet been completed.

D3. Septage Disposal:

During the system's annual inspection, the depth of sludge and scum shall be measured in all septic tanks. The septic tanks shall be pumped if: 1) the sludge is closer than twelve (12) inches to the outlet baffle or; 2) the scum layer is closer than three (3) inches to the septic tank outlet baffle or; 3) if otherwise recommended by the inspecting engineer. The permittee shall notify the Secretary in writing of the name and address of the pumper and the municipal sewage treatment facility or other facility approved by the Secretary where the septage was or is to be disposed.

D4. System Operation and Maintenance:

The sewage collection, treatment and disposal system shall be operated and maintained at all times in a manner satisfactory to the Secretary and in a manner that will not pose a risk to the public health and safety, or cause contamination of drinking water supplies, groundwater and/or surface water.

D5. Reporting of Failures:

The permittee shall immediately report any failure of the sewage collection, treatment, or disposal system to the Secretary, first by telephone within 24 hours of the failure and then in writing within 5 days of the failure. The written notice shall include a discussion of the actions taken or to be taken to correct the failure.

D6. Discharge Restrictions:

The permittee shall not allow any person to discharge or cause to be discharged anything other than sanitary sewage to this collection, treatment and disposal system.

SECTION E "MONITORING"

E1. Sampling and Testing Procedures:

All wastewater, groundwater and surface water sampling, preservation, handling and test procedures used to comply with the monitoring requirements herein shall conform to procedures specified in the most current edition of Standard Methods for the Examination of Water and Wastewater APHA - AWWA - WPCF, and the Vermont Water Quality Standards unless written approval of an alternate method is received from the Agency.

The laboratory identified in the Quality Control/Quality Assurance Plan (QA/QC Plan) shall demonstrate successful participation in third party proficiency testing recognized by ISO or NELAP for all parameters and shall analyze any check sample provided by the Secretary. Failure to obtain an acceptable result for either the Secretary's check sample or successful third-party proficiency testing may be a basis for requiring an alternate analytical laboratory.

E2. Effluent Monitoring:

The septic tank effluent shall be sampled and analyzed as follows:

PARAMETER	UNITS	SAMPLE TYPE	SAMPLE FREQUENCY
Flow	gpd	-	Continuous ⁽¹⁾
Biochemical Oxygen Demand (5-day)	mg/L	Grab	June, August and October
Total Suspended Solids	mg/L	Grab	June, August and October
Oil and Grease	mg/L	Grab	June, August and October
pH	S.U.	Grab	June, August and October
Chloride	mg/L	Grab	June, August and October
Total Kjeldahl Nitrogen (TKN)	mg/L	Grab	June, August and October
Nitrate Nitrogen	mg/L	Grab	June, August and October
Total Phosphorus	mg/L	Grab	June, August and October
⁽¹⁾ Sewage flow measurements shall be submitted by the 15th day of the month following the date of measurement.			
Effluent samples shall be taken at the septic tank effluent sampling point in Brooks Field Pump Station #1 as shown on Sheet #21.			
The results of the effluent analysis shall be submitted to the Secretary by the 15th day of the second month following the date of sampling.			

E3. Groundwater Monitoring:

The groundwater in the eight downgradient groundwater monitoring wells shall be sampled and analyzed in accordance with the following:

PARAMETER	UNITS	SAMPLE TYPE	SAMPLE FREQUENCY
Nitrate Nitrogen	mg/L	Grab	June, August and October
Total Dissolved Phosphorus	mg/L	Grab	June, August and October
pH	S.U.	Grab	June, August and October
Chloride	mg/L	Grab	June, August and October
Depth to Groundwater (below ground surface)	Feet and tenths of feet	----	At time of sampling
<p>Because of changing water table conditions, the samples from the groundwater monitoring wells may not be able to be collected on the same day or in the same week. If a monitoring well has water at any time during the month, then a sample from that well is required to be collected and analyzed.</p>			
<p>The results of these analyses shall be submitted to the Secretary by the 15th day of the second month following the date of sampling.</p>			
<p>The Secretary may require the installation of additional groundwater sampling wells should the previously installed wells fail to intercept groundwater.</p>			

E4. Receiving Stream Monitoring:

A. Chemical and Bacteriological:

The permittee shall sample the unnamed tributary of the Mad River at locations upstream and downstream of the indirect discharge as identified in the QA/QC Plan approved by the Secretary and have the samples analyzed for the following:

PARAMETER	UNITS	SAMPLE TYPE	SAMPLE FREQUENCY
Nitrate Nitrogen	mg/L	Grab	June, August and October
Total Phosphorus	mg/L	Grab	June, August and October (see Note #1)
Total Dissolved Phosphorus	mg/L	Grab	June, August and October (see Note #1)
pH	S.U	Grab	June, August and October
Chloride	mg/L	Grab	June, August and October
Escherichia coli	Colonies per 100 ml	Grab	June, August and October
<p><u>Note #1:</u> Two independent samples shall be taken and analyzed on each sampling date.</p>			
<p><u>Note #2:</u> The permittee shall not sample the receiving stream within 24 hours of any storm event affecting the stream watershed.</p>			
<p>The results shall be submitted to the Secretary by the 15th day of the second month following the date of sampling.</p>			

B. Biological:

If requested by the Secretary, the permittee shall perform biological monitoring of the unnamed tributary of the Mad River during the months of August -September each year at approved locations upstream and downstream of the indirect discharge.

E5. Summary Water Quality Evaluation:

By June 30, 2022, the permittee shall have a qualified water quality specialist submit an evaluation to the Secretary of all the past groundwater and surface water quality data and determine what, if any, short or long-term impacts there have been on groundwater or surface water quality. The biological monitoring data shall also be included, if applicable.

E6. Other Monitoring Requirements:

No other water quality monitoring of the system is required under this permit. However, the Secretary reserves the right to require monitoring of the system in accordance with Condition A(7) should operation of the system fail to meet the requirements of Sections D(1) and D(4).

SECTION F "COMPLIANCE REVIEW"

If the results of any inspection or monitoring indicate that a violation of the effluent disposal rate, or a violation of the Vermont Water Quality Standards, is occurring, or is likely to occur, the Secretary may require the permittee to take appropriate corrective actions to eliminate or reduce the possibility of a violation.

The issuance of this permit, ID-9-0278, to the Town of Warren by the Secretary relies upon the data, designs, judgement and other information supplied by the applicant, the applicant's consultants and other experts who have participated in the preparation of the application. The Secretary makes no assurance that this system will meet the performance objectives of the applicant and no warranties or guarantees are given or implied.

SECTION G "EFFECTIVE DATE"

This Indirect Discharge Permit, ID-9-0278, issued to the Town of Warren for the discharge of treated domestic sewage from the municipal sewage collection, treatment and disposal system located in Warren, Vermont is effective on this _____ day of January 2018.

Emily Boedecker, Commissioner
Department of Environmental Conservation

By: _____ DRAFT _____
Mary Clark, Program Manager
Indirect Discharge Program