

1400 Coliseum Blvd. 36110-2400 • Post Office Box 301463 Montgomery, Alabama 36130-1463 (334) 271-7700 • FAX (334) 271-7950

#### FINDING OF NO SIGNIFICANT IMPACT

The City of Moulton Lawrence County

SRF Project No. FS010193-02

January 8, 2021

The Alabama Department of Environmental Management has made \$1,000,000 in financial assistance available to The City of Moulton using funds from the Drinking Water State Revolving Fund (DWSRF) loan program. In accordance with State and Federal regulations that govern the program, the Alabama Department of Environmental Management has conducted a review to assess the potential impacts upon the environment that may result from implementation of this project.

The City of Moulton proposes a project to upgrade the existing water treatment plant and distribution system. The proposed project will consist of upgrading the current 10-inch water main from the Water Treatment Plant (WTP) to the distribution system, upgrade clearwell, replace existing sand filter media, paint exposed filter piping, install new sand filters, upgrade electrical and pump system, replace intake valves, upgrade pump station and install variable frequency drives at City Lake Reservoir, replace intake valves and upgrade pump stations at Sinking Creek Reservoir, add potassium permanganate/copper sulfate dosing stations at the City Lake and Sinking Creek surface water sources, upgrade existing sedimentation basin and install new sedimentation basin, install SCADA in the distribution system, install SCADA and altitude valves at all existing storage tanks, upgrade SCADA at the WTP, remove existing chemical storage tanks and chemical feed equipment and install district meters. Completion of this project will produce reliable quality drinking water and provide additional flow from the treatment plant into the distribution system.

The Alabama Department of Environmental Management has determined that the proposed project will not have a significant adverse impact on the environment and consequently is herewith issuing a Finding of No Significant Impact (FONSI) to support the use of DWSRF funds for the construction of the proposed project. However, this decision may be reconsidered if significant adverse information concerning the potential environmental impacts of the proposed project is discovered. Attached is an Environmental Assessment that details the proposed project and its impact upon the environment.



Mobile Branch 2204 Perimeter Road Mobile, AL 36615-1131 (251) 450-3400 (251) 479-2593 (Fax)

Comments relative to this project should be submitted in writing to Mrs. Chavon R. Jones, SRF Section, Permits & Services Division, Alabama Department of Environmental Management, P.O. Box 301463, Montgomery, Alabama 36130-1463, no later than 30 days after the date of public notice. The Alabama Department of Environmental Management will not take formal action to proceed with the project without carefully evaluating any public comments opposing the project.

Sincerely,

Lance R. LeFleur Director

LRL/EJR/CRJ/kbh

Attachment

#### **ENVIRONMENTAL ASSESSMENT**

The City of Moulton Lawrence County, Alabama

SRF Project No. FS010193-02

# A. Proposed Facilities and Actions

The City of Moulton proposes a project to upgrade the existing water treatment plant and distribution system. The proposed project will consist of upgrading the current 10-inch water main from the Water Treatment Plant (WTP) to the distribution system, upgrade clearwell, replace existing sand filter media, paint exposed filter piping, install new sand filters, upgrade electrical and pump system, replace intake valves, upgrade pump station and install variable frequency drives at City Lake Reservoir, replace intake valves and upgrade pump stations at Sinking Creek Reservoir, add potassium permanganate/copper sulfate dosing stations at the City Lake and Sinking Creek surface water sources, upgrade existing sedimentation basin and install new sedimentation basin, install SCADA in the distribution system, install SCADA and altitude valves at all existing storage tanks, upgrade SCADA at the WTP, remove existing chemical storage tanks and chemical feed equipment and install district meters. Completion of this project will produce reliable quality drinking water and provide additional flow from the treatment plant into the distribution system.

# B. Existing Environment

The City of Moulton is located in the northwest corner of Alabama. Moulton is the county seat in Lawrence County, Alabama and is approximately 54 miles east of the Alabama/Mississippi State line, and approximately 123 miles west of the Alabama/Georgia State line. Furthermore, it is located approximately 48 miles directly south of the Alabama/Tennessee State line, and approximately 280 miles directly north of the Alabama/Florida State line. The City of Moulton is located 44 miles west of Huntsville, Alabama and 72 miles northwest of Birmingham, Alabama.

#### C. Existing Water Facilities/System

The City of Moulton Water System serves approximately 3,100 metered customers in Lawrence County, Alabama. Moulton's water system includes a 3.26 MGD Water Treatment Plant (WTP) currently operating under NPDES Permit AL0053708, two (2) 200,000-gallon baffled clearwells, four (4) pump stations with a total capacity of 625 gallons per minute, two (2) ground tanks and two (2) elevated tanks with a total volume of 1,450,000 gallons. Moulton has two permitted surface water sources: Sinking Creek Reservoir and City Lake (Turkey Creek) Reservoir. Moulton has emergency connections with West Morgan East Lawrence Water Authority and West Lawrence Water Co-Op. Moulton currently wholesales water to West Lawrence Water Co-Op. Moulton's WTP is treated mechanically by mixing, flocculation, sedimentation and filtration; and chemically using potassium permanganate, aluminum sulfate, phosphate, lime, caustic soda, chlorine dioxide, copper sulfate, powdered activated carbon, polymer, and chlorine. All current sources of water are permitted and in compliance with the regulations of the Alabama Department of Environmental Management.

## D. Need for Proposed Facilities/System Improvements

The City of Moulton has the permitted production capability at the Water Treatment Plant (WTP), however the high service pumps cannot send more water to the distribution system due to the condition of the pipe leaving the WTP. A study to evaluate the water treatment plant and distribution system identified that pressures greater than 90 psi leaving the water treatment plant causes breaks. The requirement to keep pressures lowered when leaving the WTP restricts the amount of water that Moulton can provide to both Moulton and West Lawrence.

There are two transmission mains from the water treatment plant. One transmission main from the water treatment plant to the distribution system is one 10" class 160 PVC pipe with a segment of 12" D.I. pipe used to replace a segment which had continuous breaks. The 12" D.I. segment is located midway between the Moulton WTP and Moulton's downtown. The remaining portions of the 10" PVC pipe mentioned have undergone numerous repairs from line breaks. The second pipe is asbestos cement (otherwise called AC or transite). The life of AC pipe is 50-60 years. This pipe has been installed longer than the recommend life and has degradation and has constant breaks.

Up until the late 1990s when West Lawrence began purchasing water from West Morgan, Moulton had provided 90% of West Lawrence's water through five (5) purchase meters located on the Moulton distribution system. After modifying the hydraulics of their distribution system and valving off two Moulton purchase meters, West Lawrence fed the northern portion of their system from West Morgan and reduced the amount of water being purchased from Moulton. The northern most purchase meter located on Lawrence County Road 240 was valved off to allow Moulton to direct more water toward the downtown and industrial park areas. A second purchase meter valved off is located on Lawrence County Road 33. Closure of these two purchase meters creates a water model where purchase from Moulton is only being made at the middle and southern end of the water system in two locations to provide water to West Lawrence. West Lawrence currently purchases 30 million gallons per month from Moulton but needs more water in the southern portion of their system.

One of the purchase meters that remains active is located on Lawrence County Road 460 and feeds directly from the Moulton downtown area (Hospital Tank). Due to the size restriction of smaller pipes through the Moulton downtown area, the water demand in Moulton's downtown, and the volume of water demanded by West Lawrence, the 100,000-gallon Moulton Hospital Tank with an overflow elevation of 794.75' has difficulty maintaining an adequate water level to supply the pressure needs and storage to the remaining Moulton distribution system. At times, the Moulton Hospital tank is only 10% filled and Moulton is required to temporarily close the West Lawrence purchase meter located on County Road (CR) 460 to allow the Hospital tank to fill. Fire demands in the Moulton downtown area further worsen the storage and pressure issues.

When the CR 460 purchase meter is closed there is a lack of pressure on West Lawrence Water System's customer base south of Highway 24 leaving numerous West Lawrence customers without adequate pressure and flow, and at times complete outage. West Lawrence has hundreds of poultry production facilities in the southern area of their system. Lack of water to these areas has a tremendous economic impact on business owners. West Lawrence depends greatly on the constant feed from the CR 460 purchase meter, operating their booster pump station fed by this meter 24 hours a day to supply customers south of Highway 24.

There is another West Lawrence purchase meter located on the southern boundary of the Moulton distribution system on Lawrence County Road 59. The deficiencies mentioned above limit the full potential of water reaching this purchase meter and being passed to West Lawrence's south-east distribution system.

Ultimately, the hydraulic model of the water routed to the purchase meter locations must be revised. Water usage has increased since the 1990s and the system piping infrastructure and purchase meter locations need to be updated in order to provide Moulton and West Lawrence's customer base with the current water demand. To accomplish this, water must be sold at more

locations, as it was in the past. The WTP capacity and production capabilities must increase. The distribution capabilities must be resolved so more water can be pushed from the plant to the system via new pipe.

# E. Alternatives Analysis

# **Transmission Main Replacement (Alternatives)**

#### **No Action Alternative**

No action would allow main breaks to continue, which is lost revenue for the City of Moulton. Moulton would not be capable of supplying additional flow to the system or West Lawrence Water without a new transmission water main from the WTP to purchase water meters. Therefore, this option was not selected.

#### Alternative 1 – Installation of HDPE transmission mains

Installation of HDPE distribution pipe is an alternative. However, assuming all other requirements are the same between HDPE and ductile iron, HDPE would require the purchase of large diameter fusing equipment and generator to operate the equipment. Use of HDPE requires specialized training for employees contributing increased costs. HDPE is currently not used in the Moulton distribution system and would require stocking of HDPE for use when needed. Moulton already has ductile iron in use in the distribution system and has both the equipment to maintain the pipe and staff are already trained in the use of the material.

Presently, the cost of HDPE is approximately \$3.50 to \$5.00 per foot less than that of ductile iron however this is based on a seven-day cost proposal received from local supply houses. The cost of HDPE is closely tied to oil prices due to the petroleum by-products used in production of HDPE pipe, and any increase in petroleum production, caused by changes in supply or natural weather events, can drastically change that cost creating swings that affect the overall budget of the system. With multiple ductile iron production facilities located in the State of Alabama, ductile iron pipe can be a more reliably sourced product for years to come.

This alternative was not chosen because of the cost's initial difference.

#### Alternative 2 – PVC Pipe

PVC Pipe like ductile is used in the Moulton distribution system, however PVC like HDPE is closely tied to petroleum production. PVC does not have the ability to resist impacts or forced point loads due to rocks against the PVC pipe walls like ductile pipes. Bedrock is found in most areas of the system and placement of PVC pipe in these areas has demonstrated an increase of pipe breaks in the Moulton system above that of ductile iron pipe. PVC bends are not preferred in distribution mains due to pressure issues and water hammer that can cause increased pressure points at these locations. Typically, ductile iron fittings are used with the installation of PVC transmission pipe at directional changes rather than PVC fittings. Changes in materials used requires the use of special adapter fittings increasing the cost of using PVC pipe.

Based on reliability, accessibility of materials, fluctuation in market pricing, and the need for specialized fittings, PVC pipe was not selected.

#### **Water Treatment Plant Upgrades (Alternatives)**

The Moulton Water Treatment Plant Upgrades project is the project to upgrade the Moulton Water Treatment Plant. As such, all parts make up the whole of the plant for reliability and quality of produced water. Each component is required and needed to create a viable water production facility. Therefore, alternates are not discussed for each individual component. Potable water for an established community is vital.

To do nothing will continue the decline and loss of use of the existing water treatment plant services for over 3,000 residents of Moulton and the surrounding businesses. Not addressing the current needs of the WTP will continue to require more and more maintenance. Down time from inoperable equipment places the City at risk to be without water, thereby not providing water to customers and wholesale customers. Continuing along the current path will eventually result in the reduction of water the plant can produce. For these reasons, the Do Nothing alternative was not chosen.

### **Alternative 1 - Construct a new Water Treatment Facility**

The construction of a new Water Treatment Plant is estimated to cost approximately 65 to 75 million dollars. Requirements would include acquiring new property, permitting, development of distribution lines to reach the existing distribution system, new power system, roads, and the decommissioning of the existing plant. The construction of a new treatment facility would have environmental issues pertinent to the selected site which would be unidentifiable at this time. Due to cost and unknowns, the construction of a new facility was not chosen.

#### **Alternative 2 – Purchase Water from Interconnections**

The purchase of water from neighboring sources to supply the volume of water currently produced by Moulton was explored. This action would require the increase in size and installation of transmission mains for great distances to reach purchase locations. There is not an existing interconnection that can supply the amount of Water Moulton and West Lawrence will require now or in the future. Cost estimates to upgrade interconnections and piping infrastructure would exceed the amount required for a WTP upgrade. Moulton has two viable and sustainable water sources for treatment. Due to estimated costs this option was not selected.

#### F. Environmental Justice

As defined by the Environmental Protection Agency (EPA), environmental justice is the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations and policies. Fair treatment means that no group of people, including a racial, ethnic, or socioeconomic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.

Presidential Executive Order 12898, "General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing the disproportionately high and/or adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities.

The Environmental Justice map for the proposed project revealed that low income EJ populations are located in close proximity to the proposed project area. The proposed water system improvements will benefit all areas serviced by the water system. Upgrading the water system infrastructure will provide safe, sustainable drinking water for all areas of the community.

## G. Environmental Consequences; Mitigating Measures

The proposed project activities represent no overall or lasting adverse environmental impact except as normally and minimally associated with construction activities. Some short term effects including increased noise levels, dust, exhaust emissions, increased stream turbidity and/or the disruption of normal traffic flow maybe of minimal impact and occur during actual construction. While all such effects cannot be totally avoided, adherence to Best Management Practices (BMPs) during the course of the project will significantly minimize such conditions. Traffic disruptions will be greatly lessened by conformance to an approved traffic maintenance plan.

#### **Endangered Species and Critical Habitat**

Project review and concurrence was requested from the U.S. Fish and Wildlife (F&W) Service. The U.S. Fish and Wildlife Service provided a letter of concurrence. The letter stated, "No federally listed species/critical habitat are known to occur in the project area. As described, the project will have no significant impact on fish and wildlife resources."

# Historical and Archaeological

Review of proposed project work by the Alabama Historical Commission found no potential adverse impact of cultural resources. Project approval was granted upon the condition that the location, scope, and nature of construction activities remain as originally presented and occur within existing highway right-of-ways or previously disturbed areas. Should artifacts or archaeological features be encountered during execution of project activities, work should cease and the Alabama Historical Commission should be contacted immediately.

# Wetlands and Floodplains

The Department of the Army Corps of Engineers (COE) was solicited for comment and concurrence of proposed project work. The U.S. Army Corps of Engineers provided a letter of concurrence. The letter stated, "We have no objections to the applicant receiving grant funds, provided the applicant applies for and obtains any required permits prior to any disturbance to streams and/or wetlands that may occur during project construction. The applicant may apply at any time."

Project concurrence dated August 10, 2020, was also received from North Central Alabama Regional Council of Governments (NARCOG). The letter stated, "NARCOG has reviewed the information and maps supplied and we offer our concurrence for this project."

Project concurrence dated August 18, 2020, was also received from the Tennessee Valley Authority (TVA). The letter stated, "It appears that no TVA property is being requested for the project. Activities that do not create new or additional obstruction would not require approval under Section 26a of the TVA Act."

#### H. Public Participation: Sources Consulted

A Public Meeting was held at 5:00 p.m. on Monday, July 20, 2020, at the Moulton City Hall located at 720 Seminary Street, Moulton, Alabama. The meeting provided information and an open discussion to receive comments and concerns related to the proposed project and justification of improvements proposed for funding by the DWSRF loan. No objections or comments were expressed.

Sources to be consulted about this project for information or concurrence include the following:

Alabama Department of:

Agriculture and Industries

Conservation and Natural Resources

Economic and Community Affairs (ADECA)

Public Health

State Soil and Water Conservation

Alabama Forestry Commission Alabama Historical Commission

US Army Corps of Engineers

Department of Interior – Fish and Wildlife Service
US Environmental Protection Agency
Lawrence County Health Department

# DEPARTMENT OF THE ARMY



CORPS OF ENGINEERS, NASHVILLE DISTRICT WESTERN REGULATORY FIELD OFFICE 2424 DANVILLE ROAD SW SUITE N DECATUR AL 35603

September 17, 2020

SUBJECT: File No. LRN-2020-00905; City of Moulton DWSRF Project, Almon & Crow Branches; Crow Branch, Muddy Fork, Big Nance Creek; Tennessee River Mile 274.0 Left Bank; Lawrence Alabama.

Bartley Taft
The Kelley Group
P.O. Box 45
Tuscumbia, Alabama 35674

Dear Mr. Taft:

This is in response to your July 23, 2020, request for our comments regarding the subject project.

The U.S. Army Corps of Engineers (USACE) has regulatory responsibilities pursuant to Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403) and Section 404 of the Clean Water Act (33 U.S.C. 1344). Under Section 10, the USACE regulates all work in, or affecting, navigable waters of the U.S. Under Section 404, the USACE regulates the discharge of dredged and/or fill material into waters of the U.S. (33 CFR Part 328).

A review of the information provided indicates the subject activity may involve work in wetlands/waters of the U.S.; therefore, a Department of the Army permit may be required.

We understand the project proposal may not have specific design plans at this time, and this inquiry is an initial review to obtain grant funds. We have no objections to the applicant receiving grant funds for the proposal.

If you have questions regarding this matter, please contact Eric Sinclair at the above address or telephone (256) 350-5620. Thank you for the opportunity to review and comment on this proposed project.

Sincerely,

William E Sinclair

Regulatory Project Manager

Regulatory Division

U.S. Army Corps of Engineers



# ALABAMA HISTORICAL COMMISSION

468 South Perry Street Montgomery, Alabama 36130-0900 334-242-3184 / Fax: 334-240-3477 Lisa D. Jones
Executive Director
State Historic Preservation Officer

September 14, 2020

Wendy Delinski The Kelley Group 105 West 2<sup>nd</sup> Street Tuscumbia, AL 35674

Re: AHC 20-1159

Moulton Water System Improvements

Lawrence County

Dear Ms. Delinski:

We concur with the above referenced project provided all construction activities will occur within **existing and previously disturbed** highway right-of-way and/or other previously disturbed areas. For the purposes of this letter, previous disturbance is defined as mechanical disturbance to either culturally sterile subsoil, or the maximum depth of the proposed undertaking. It should be noted that agricultural plowing does not typically meet this threshold of disturbance, nor do previously undisturbed portions of the ROW that require clearing of additional vegetation. Any area that is to be involved and does not fall into one of the above categories will require a cultural resource assessment by a professional archaeologist. Submit the resulting report to our office for review and determination prior to project initiation.

Consultation with the State Historic Preservation Office does not constitute consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public. If archaeological materials are encountered during construction, the procedures codified at 36 CFR 800.13(b) will apply. Archaeological materials consist of any items, fifty years old or older, which were made or used by man. These items include but are not limited to, stone projectile points (arrowheads), ceramic sherds, bricks, worked wood, bone and stone, metal, and glass objects. The federal agency or the applicant receiving federal assistance should contact our office immediately. If human remains are encountered, the provisions of the Alabama Burial Act (*Code of Alabama* 1975, §13A-7-23.1, as amended; Alabama Historical Commission Administrative Code Chapter 460-X-10 Burials) should be followed. This stipulation shall be placed on the construction plans to ensure contractors are aware of it.

We appreciate your commitment to helping us preserve Alabama's historic archaeological and architectural resources. Should you have any questions, please contact Amanda McBride at 334.230.2692 or Amanda.McBride@ahc.alabama.gov. Have the AHC tracking number referenced above available and include it with any future correspondence.

Sincerely,

Lee Anne Wofford

Deputy State Historic Preservation Officer

Le anne Woffon

LAW/AMH/nw



TA/SH 2020-TH-1356



BY: CMS

P.O. Box 45 Tuscumbia, AL 35674 www. kelleynetwork.com

P: 256.248.7030 • F: 1.866.225.7488

July 23, 2020

William J. Pearson
U.S. Fish and Wildlife
1208-B Main Street
Daphne, Alabama 36526
VIA EMAIL bill pearson@fws.gov

RE: City of Moulton – DWSRF Project – Request for Concurrence

Dear Mr. Pearson:

The City of Moulton seeks to make improvements to its water system and is seeking Drinking Water State Revolving Fund (DWSRF) assistance from the Alabama Department of Environmental Management (ADEM). We respectfully request your agency's review of this project for concurrence.

The water system improvements project consists of water treatment plant upgrades, water line infrastructure improvements and constructing new booster pump station.

Maps of the proposed improvements are attached for your review.

All work will be located within previously disturbed areas within existing water lines. Project footprint is located within existing Alabama Department of Transportation right-of-way, Lawrence County right-of-way and existing City of Moulton right-of-way and property holdings.

After review, feel free to email the letter of concurrence to kelley@kelleynetwork.com.

Thank you for your time and consideration of this project.

Respectfully submitted,

Bartley W. Taft, P.E.

Attachments

PERSONAL PROPERTY OF THE PROPE

U.S. Fish and Wildlife Service 1208-B Main Street – Daphne, Alabama 36526 Phone: 251-441-5181 Fax: 251-441-6222

No federally listed species/critical habitat are known to occur in the project area. As described, the project will have no significant impact on fish and wildlife resources. IF PROJECT DESIGN CHANGES ARE MADE, PLEASE SUBMIT NEW PLANS FOR REVIEW. We recommend use of best management practices specific to your project (See http://www.fws.gov/daphne/section7/bmp.html).

Mylu-Olyan

SFP 0 4 2020

William J. Pearson, Field Supervisor

Date

# 3



August 10, 2020

The Kelley Group ATTN: Bart Taft, P.E. P.O. Box 45 Tuscumbia, AL 35674

RE: Letter of Concurrence

City of Moulton - DWSRF Project Lawrence County, Alabama

Dear Mr. Taft:

The North Central Alabama Regional Council of Governments (NARCOG) has reviewed the information and maps supplied for the proposed water system improvements project referenced above located in Lawrence County, Alabama, and we offer our concurrence for this project. NARCOG understands that the proposed project consists of:

- Water treatment plant upgrades
- Water line infrastructure improvements
- Constructing a new booster pump station

In conclusion, NARCOG finds the proposed project to be consistent and compatible with local, state, and regional plans, not withstanding any negative environmental impacts. Should you need any further assistance, please do not hesitate to call me at (256) 355-4515.

Sincerely,

oseph F Hester, AICP V

Director of Planning and Development

cc: Ro

Robby Cantrell, Executive Director

File



Tennessee Valley Authority, Post Office Box 1010, Muscle Shoals, Alabama 35662-1010

August 18, 2020

Mr. Bartley W. Taft, P.E. Engineers of the South On behalf of West Lawrence Water Authority Post Office Box 45 Tuscumbia, Alabama 35674

Dear Mr. Taft:

CITY OF MOULTON DRINKING WATER STATE REVOLVING FUND (DWSEF) APPLICATION – LAWRENCE COUNTY, ALABAMA

We have reviewed your July 23, 2020 letter notifying the Tennessee Valley Authority (TVA) of the City of Moulton's application for Drinking Water State Revolving Fund for the water treatment plant upgrades, water line infrastructure and constructing new booster pump station.

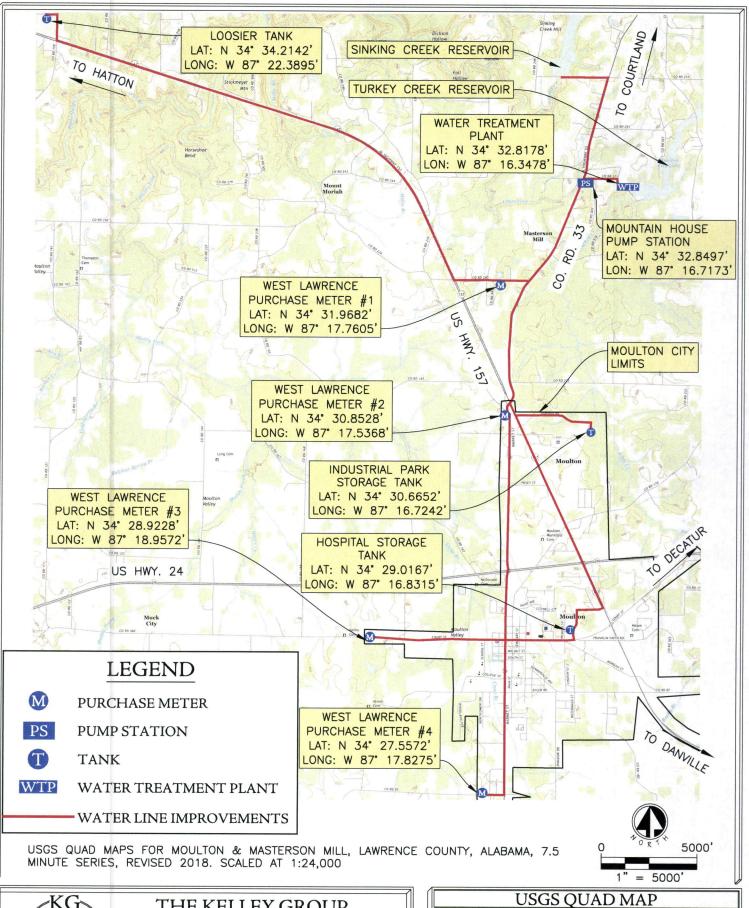
Based on the information submitted, it appears that no TVA property is being requested for the project. Activities that do not create new or additional obstruction are not new obstructions and would not require approval under Section 26a of the TVA Act. If you determine that any of the proposed activities will create a new obstruction, then the proposal would require approval from TVA. A completed application, final plans with detailed drawings, and appropriate application fee should be sent to TVA for review.

We appreciate the opportunity to work with you and look forward to working with you in the future. If you have any additional questions or concerns, please feel free to contact me by email, <a href="mailto:ikaustin@tva.gov">ikaustin@tva.gov</a> or at (256) 386-3456.

Sincerely,

Kenley Austin Program Manager

Reservoir Land Use & Permitting





# THE KELLEY GROUP

Tuscumbia, Alabama 35674 Phone: 256.248.7030 Fax: 1.866.225.7488

civil • municipal • planning • grant writing

**QUAD MAP** 

CITY OF MOULTON LAWRENCE COUNTY, ALABAMA

PROJECT NUMBER SHEET NUMBER 7/2020