



west virginia department of environmental protection

Division of Water and Waste Management
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0495
Fax: (304) 926-0463

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

**CONSENT ORDER
ISSUED UNDER THE
WATER POLLUTION CONTROL ACT
WEST VIRGINIA CODE, CHAPTER 22, ARTICLE 11**

TO: Antero Resources Corporation
ATTN: Alwyn A. Schopp, Regional Vice President
1615 Wynkoop Street
Denver, CO 80202

DATE: June 1, 2016

ORDER NO.: 8060

INTRODUCTION

This Consent Order is issued by the Director of the Division of Water and Waste Management (hereinafter "Director"), under the authority of West Virginia Code, Chapter 22, Article 11, Section 1 et seq. to Antero Resources Corporation (hereinafter "Antero").

FINDINGS OF FACT

In support of this Order, the Director hereby finds the following:

1. Antero is an oil and gas company conducting land disturbance activity in Harrison County, West Virginia.
2. On January 13, 2014, West Virginia Department of Environmental Protection (WVDEP) personnel conducted a complaint investigation relating to Antero activity near Chiefton in Harrison County. During the investigation, a violation of the following section of WV Legislative Rules was observed and documented:
 - a. 47CSR2 Section 3.2.b-Antero caused conditions not allowable in waters of the State by creating sediment deposits. Specifically, activities associated with Antero on and near Katy Lick - Sardis Road (County Route 7) resulted in deposition of sediments/solids in a UT of Limestone Run at and near GPS coordinates N 39° 18' 09.12" W 80° 25' 58.09." Debris from road sweeping, access road deterioration, dust and other sources created significant sediment deposits in waters of the State.

As a result of the aforementioned violation, Notice of Violation (NOV) No. W-NW-TWH-011314-001 was issued to Antero.

3. On August 18, 2014, WVDEP Office of Oil and Gas personnel conducted a site visit at the Antero Morris Frac Pit. During the visit, evidence of a spill occurring at a secondary containment structure on Antero's nearby water treatment facility at or near GPS coordinates 39° 18.2458' N 80° 25.8990' W was observed. The inspector alerted on-site personnel and notified WVDEP Environmental Enforcement personnel. During the spill response, the following observations were made:
 - a. Staining consistent with the reported breach of containment was evident on the felt underlying the secondary containment.
 - b. Gravel had been placed over an area where staining had been identified by an inspector with WVDEP Office of Oil and Gas.
 - c. Soil samples were taken in the vicinity of the reported breach of containment by WVDEP Environmental Enforcement personnel. The sample resulted in a Total Petroleum Hydrocarbons (TPH) Oil-Range Organics (ORO) level of 622 mg/kg, which is well above the TPH-ORO Action Level of 100mg/kg outlined in the WVDEP Groundwater Program Remediation Guidance Document.

To date, this spill has not yet been remediated.

4. On December 16, 2014, WVDEP personnel conducted a partial inspection of a spill reported at Antero's Water Process Facility. The spill report stated that the spill (Spill One) was contained inside of secondary containment, and that cleanup of the spill was complete. During the inspection, however, WVDEP personnel observed and documented that the reported spill from a leak in the frac tank was in progress, cleanup was not completed, and the wastewater was leaking outside of the dedicated containment system. It was also noted during the inspection that a second source of spillage (Spill Two) was occurring near the western footprint of the Water Process Facility near a small unnamed tributary of Limestone Run, and the soil in the area was dark and had a petroleum odor. Lab results of a soil sample taken at the eastern bank of the unnamed tributary at the spill site revealed elevated levels of Total Chloride, Total Strontium, Total Barium, TPH-Diesel Range Organics (DRO), and TPH-ORO as compared to a background sample taken at the western bank of the unnamed tributary. During the inspection, a violation of the following section of WV Legislative Rules was observed and documented:
 - a. 47CSR11 Section 2.5 –Antero failed to immediately take all measures necessary to contain spills.

As a result of the aforementioned violation, NOV No. W-NW-TWH-0121614-001 was issued to Antero.

5. On December 18, 2014, WVDEP personnel conducted a partial inspection of Antero's Water Process Facility. During the inspection, WVDEP personnel observed that, in addition to the two spills observed and documented during the December 16, 2014 inspection, another spill (Spill Three) had occurred. Further investigation revealed that this spill had not been reported. WVDEP personnel observed another spill (Spill Four) in an area down gradient of the offload manifold covered with straw. Further investigation revealed that a tank truck had spilled its contents during off-loading activities, a spill

containment system had not been deployed, the contents had migrated off of the pad and onto the ground, straw had been deployed to soak up the contents, the soil was stained black, and the spill had not been reported. During the inspection, a violation of the following section of WV Legislative Rules was observed:

- a. 47CSR11 Section 2.5 –Antero failed to immediately take all measures necessary to contain spills.
6. On December 22, 2014, WVDEP personnel met with Antero at the Water Process Facility. During this meeting, the following items were discussed:
- a. Elevated chloride levels in a small constructed sump outside the secondary containment at Spill One were discussed. The sump is routinely evacuated, and its contents, including spillage and stormwater, are returned into the water treatment system.
 - b. A small constructed sump near Spill Two is frequently evacuated of stormwater and associated spillage. Black stained soil near Spill Two had been sampled and analyzed by Antero and reflected elevated levels of TPH-DRO. The sump had been constructed in or near the defined limit of a reported wetland and some fill may have been placed in the wetland.
 - c. Remediation of contaminated black stained soil near Spill Four is necessary. Antero was advised by WVDEP personnel to report the spill to the United States Environmental Protection Agency (USEPA). Antero agreed to provide a proposed sampling and remediation plan for the spill areas.
 - d. Antero agreed to provide a written copy of its Spill Reporting and Response Plan including training, reporting procedures, response procedures and other pertinent information.
 - e. The following action items were requested as a result of this meeting:
 - i. Submittal to WVDEP personnel of a proposed site investigation plan for the aforementioned four (4) spill locations that were confirmed or reasonably expected to contain contaminated soils.
 - ii. Submittal to WVDEP personnel of Antero's Standard Operating Procedures for spill reporting.
 - iii. Submittal to WVDEP personnel of Amanda Fernley's field reports detailing visits to the spill sites on December 18 and 19, 2014.
 - iv. Submittal to USEPA of a report that documents spill related impacts to Wetland One (1). Of specific concern were chloride results in the wetland sump that was collecting stormwater.
7. On January 30, 2015, WVDEP personnel received a preliminary proposed sampling and soil remediation plan for the aforementioned four (4) spill locations that were confirmed or reasonably expected to contain soil contamination. The plan stated that Shalewater Solutions, LLC. would cease operations at the site within the next six (6) to twelve (12) months, and, after operations were concluded at the Morris Pad location, Antero would conduct a more robust sampling and analysis of soil and water at the site. The completed sampling and soil remediation plan was intended to adequately cover the entire footprint of the water treatment process location in the form of grid soil and water sampling throughout the site. Antero represented that the completed plan would be submitted to WVDEP personnel for comment by April 1, 2015.

8. On February 7, 2015, WVDEP personnel were notified that a spill of contaminated stormwater had occurred at Antero's Water Process Facility when a truck driver contracted by Antero failed to close the valve on his hose. The trucking company retained a remediation company for clean-up, and WVDEP Personnel visited the site on February 10, 2015 to determine if additional remediation would be required. There was no visible staining on the ground, and a soil confirmation sample reflected a result below the action level for TPH.
9. On February 9, 2015, WVDEP personnel were notified of a spill of sludge from the treatment tank that occurred on February 8, 2015. The truck driver, a contractor, failed to empty the hose completely before placing it back on the truck, allowing the residual material to flow onto the ground. The trucking company retained a remediation company for clean-up, and WVDEP Personnel visited the site on February 10, 2015 to determine if additional remediation was needed. There was no visible staining on the ground, and a soil confirmation sample reflected a result below the action level for TPH.
10. On February 9, 2015, WVDEP personnel were notified of a spill of brine water from one of Antero's contracted trucks onto the asphalt at the Water Treatment Facility. An investigation by WVDEP personnel on February 10, 2015 determined that the fluid had flowed off of the pavement and onto the vegetation below. Antero representatives reported that only an inch of soil was removed, because there was a gas line running through the area. The line was marked, and additional soil was excavated on February 16, 2015. Soil confirmation samples reflected results below the action level for TPH.
11. On March 20, 2015, WVDEP personnel were notified of a spill at Antero's Water Treatment Facility that occurred on March 19, 2015. Antero reported that one of its contracted trucks loading treated water on the upper lot overflowed onto the pavement. Antero stated that the material did not leave the asphalt and was remediated using sphag sorb and pads; therefore, soil confirmation samples were not taken. An incident report and photos taken at the spill site on March 19, 2015 were provided by Antero during WVDEP personnel's investigation.
12. On April 7, 2015, WVDEP personnel received an email from Antero requesting an extension until May 15, 2015 for submittal of the aforementioned completed site investigation plan. The request was approved by WVDEP personnel.
13. On May 15, 2015, Antero submitted a proposed site investigation plan.
14. On June 12, 2015, WVDEP personnel responded to Antero's proposed site investigation plan. The plan was not approved, additional revisions were requested by WVDEP personnel, and a detailed list of comments was provided.
15. On August 27, 2015, Antero was issued WV/NPDES Permit No. WV0111457, Registration No. WVG611695, for its regulated activity at the Morris Pad Water Treatment Facility.

ORDER FOR COMPLIANCE

Now, therefore, in accordance with Chapter 22, Article 11, Section 1 et seq. of the West Virginia Code, it is hereby agreed between the parties, and ORDERED by the Director:

1. Antero shall immediately take all measures to initiate compliance with all pertinent laws and rules.
2. Within thirty (30) days of the effective date of this Order, Antero shall provide a report to WVDEP personnel that identifies all unpermitted sites in West Virginia for which coverage under WV/NPDES Multi-Sector General Water Pollution Control Permit No. WV0111457 is required.
3. Within forty-five (45) days of the effective date of this Order, Antero shall submit administratively complete WV/NPDES permit applications for all sites identified in the report required by Order for Compliance No. Two (2). Any questions regarding the application process shall be directed to WVDEP DWWM-Permitting Section at (304) 926-0495.
4. Within thirty (30) days of the effective date of this Order, Antero shall submit for approval a proposed plan of corrective action (POCA) outlining action items and completion dates for how and when Antero will complete the provisions of the POCA and achieve compliance with all terms and conditions of its WV/NPDES permit and pertinent laws and rules. The POCA shall include, but not be limited to, the following:
 - a. An approvable sampling plan for the aforementioned areas of concern. The plan shall include, but not be limited to, detailed sampling procedures and standards that will be used to evaluate sample results.
 - b. An approvable remediation plan for any areas in which the aforementioned sampling results indicate that remediation is necessary.

Upon approval, the plan of corrective action and schedule shall be incorporated into and become part of this Order, as if fully set forth herein. Failure to submit an approvable plan of corrective action and schedule or failure to adhere to the approved schedule is a violation of this Order.

The aforementioned report and plan of corrective action shall make reference to Order No. 8060 and shall be submitted to:

Chief Inspector
Environmental Enforcement - Mail Code #031328
WVDEP
601 57th Street SE
Charleston, WV 25304

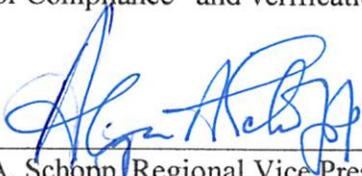
5. Because of Antero's Legislative Rule violations, Antero shall be assessed a civil administrative penalty of eleven thousand one hundred ninety dollars (\$11,190) to be paid to the West Virginia Department of Environmental Protection for deposit in the Water Quality Management Fund within thirty (30) days of the effective date of this Order. Payments made pursuant to this paragraph are not tax-deductible for purposes of State or federal law. **Payment shall include a reference to the Order No. and shall be mailed to:**

**Chief Inspector
Environmental Enforcement - Mail Code #031328
WV-DEP
601 57th Street SE
Charleston, WV 25304**

OTHER PROVISIONS

1. Antero hereby waives its right to appeal this Order under the provisions of Chapter 22, Article 11, Section 21 of the Code of West Virginia. Under this Order, Antero agrees to take all actions required by the terms and conditions of this Order and consents to and will not contest the Director's jurisdiction regarding this Order. However, Antero does not admit to any factual and legal determinations made by the Director and reserves all rights and defenses available regarding liability or responsibility in any proceedings regarding Antero other than proceedings, administrative or civil, to enforce this Order.
2. The Director reserves the right to take further action if compliance with the terms and conditions of this Order does not adequately address the violations noted herein and reserves all rights and defenses which he may have pursuant to any legal authority, as well as the right to raise, as a basis for supporting such legal authority or defenses, facts other than those contained in the Findings of Fact.
3. If any event occurs which causes delay in the achievement of the requirements of this Order, Antero shall have the burden of proving that the delay was caused by circumstances beyond its reasonable control which could not have been overcome by due diligence (i.e., force majeure). Force majeure shall not include delays caused or contributed to by the lack of sufficient funding. Within three (3) working days after Antero becomes aware of such a delay, notification shall be provided to the Director/Chief Inspector and Antero shall, within ten (10) working days of initial notification, submit a detailed written explanation of the anticipated length and cause of the delay, the measures taken and/or to be taken to prevent or minimize the delay, and a timetable by which Antero intends to implement these measures. If the Director agrees that the delay has been or will be caused by circumstances beyond the reasonable control of Antero (i.e., force majeure), the time for performance hereunder shall be extended for a period of time equal to the delay resulting from such circumstances. A force majeure amendment granted by the Director shall be considered a binding extension of this Order and of the requirements herein. The determination of the Director shall be final and not subject to appeal.
4. Compliance with the terms and conditions of this Order shall not in any way be construed as relieving Antero of the obligation to comply with any applicable law, permit, other order, or any other requirement otherwise applicable. Violations of the terms and conditions of this Order may subject Antero to additional penalties and injunctive relief in accordance with the applicable law.
5. The provisions of this Order are severable and should a court or board of competent jurisdiction declare any provisions to be invalid or unenforceable, all other provisions shall remain in full force and effect.
6. This Order is binding on Antero, its successors and assigns.

7. This Order shall terminate upon Antero's notification of full compliance with the "Order for Compliance" and verification of this notification by WVDEP.



Allyn A. Schopp, Regional Vice President
Antero Resources Corporation

Date 6/9/2016

Public Notice begin:

Date

Public Notice end:

Date

Scott G. Mandirola, Director
Division of Water and Waste Management

Date



Finding of Fact (FOF) No. 2 - P1130008 – Compromised BMPs observed contributing to settleable solids in Toms Fork



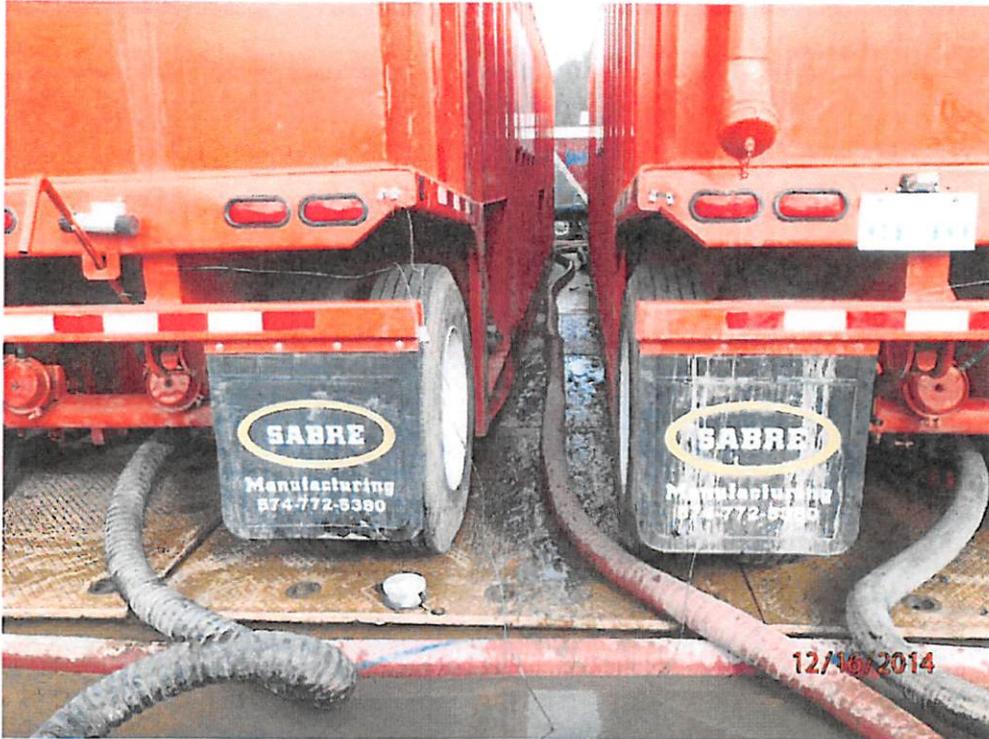
FOF No. 2 - P1130038 – Compromised BMPs observed contributing to settleable solids in Toms Fork



FOF No. 3 - P8180008 – Staining observed outside of secondary containment and gravel placed in an area where staining was observed by WVDEP inspector who identified the spill

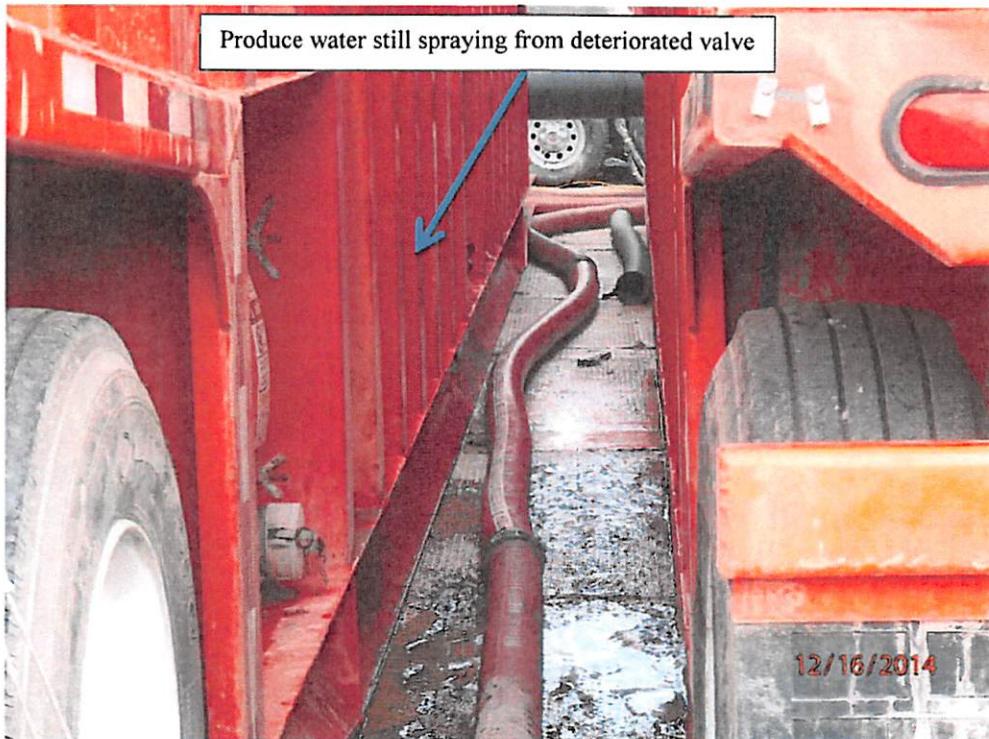


FOF No. 3 - P8180017 – Staining observed outside of secondary containment and gravel placed in an area where staining was observed by WVDEP inspector who identified the spill



PC161722

FOF No. 4 - Spill continuing, clean-up in progress, not contained in plastic (Spill 1)



PC161723

FOF No. 4 - Spill continuing, clean-up in progress, not contained in plastic (Spill 1)



PC161724

FOF No. 4 - Spill continuing, clean-up in progress, not contained in plastic (Spill 1)



PC161726

FOF No. 4 - Spill continuing, clean-up in progress, not contained in plastic (Spill 1)



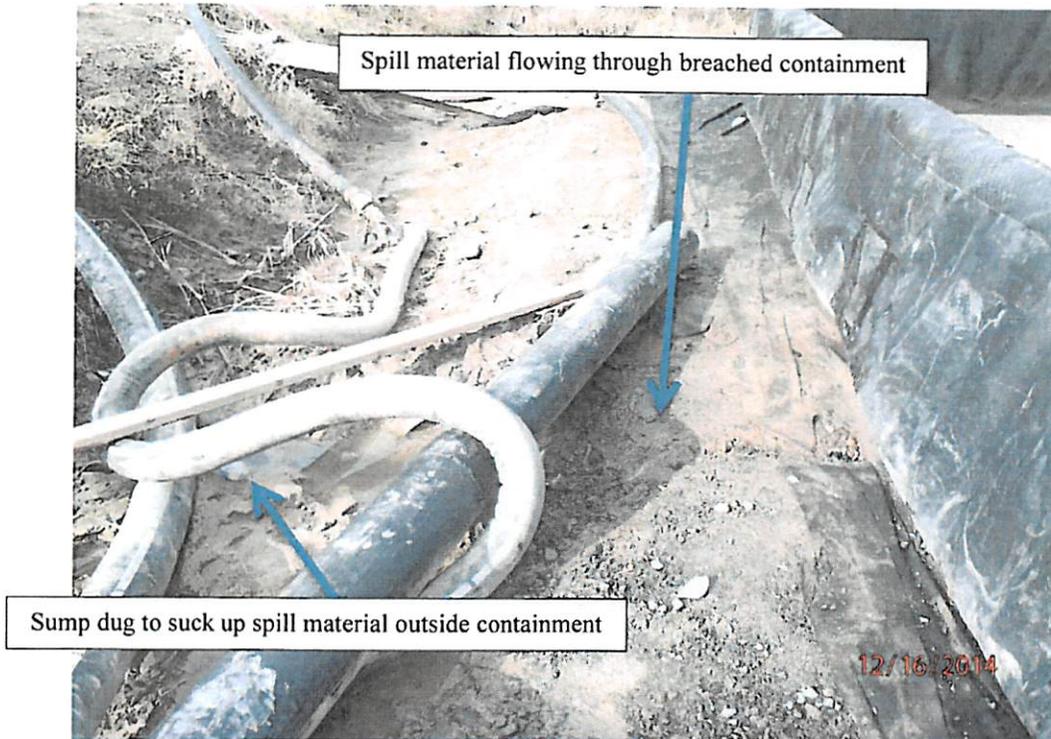
PC161727

FOF No. 4 - Spill continuing, clean-up in progress, not contained in plastic (Spill 1)



PC161728

FOF No. 4- Spill continuing, clean-up in progress, not contained in plastic (Spill 1)



FOF No. 4 - Spill continuing, clean-up in progress, not contained in plastic (Spill 1)



PC161732

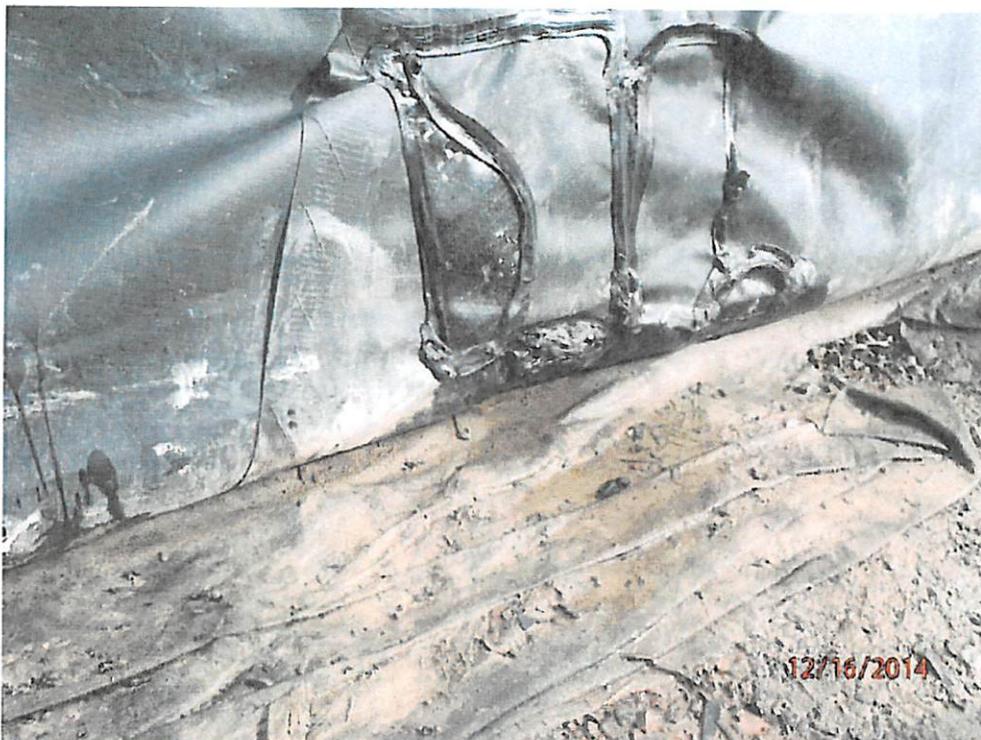
FOF No. 4 - Spill continuing, clean-up in progress, not contained in plastic (Spill 1)



FOF No. 4 - Spill continuing, clean-up in progress, not contained in plastic (Spill 1)

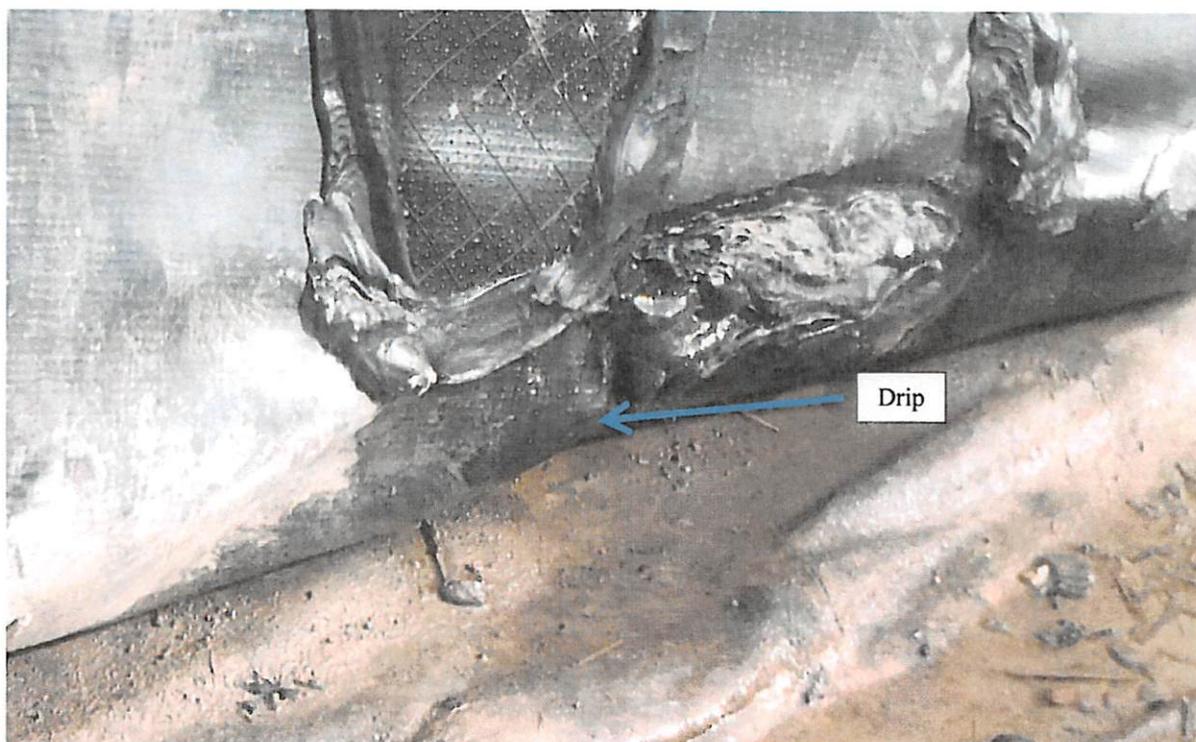


FOF No. 4 - Spill continuing, clean-up in progress, not contained in plastic (Spill 1)



PC161737

FOF No. 4 - Spill continuing, clean-up in progress, not contained in plastic (Spill 1)



PC161737 (Zoomed)

FOF No. 4 - Spill continuing, clean-up in progress, not contained in plastic (Spill 1)



PC161721

FOF No. 4 - Spill area tested positive for TPH-DRO and contained odors (Spill 2)



PC161718

FOF No. 4 - Spill area tested positive for TPH-DRO and contained odors (Spill 2)

12/17/14
16-46

SPILL REPORT FORM

SHALEWATER
Resources

Instructions: Complete for any type of hazardous material/waste spill or incident. Provide a copy of this report to the Mine Safety & Health Administration.

1. Personnel Involved in Spill Reporting:

Name, Title, and Phone Number: Jonathan Holton, Chief Operator
574-216-2294

Personnel that was informed of spill when it took place:

Name, Title, and Phone Number: Paul Rich, Site Environmental Specialist
611-622-8282

2. Contractor:

Name and Title of Person Responsible for Spill Response: Georg Holton, Site Manager, Ashland
Phone Number: 214-216-2294

3. General Spill Information:

Common Name of Spilled Substance: Treated Water

Quantity Spilled (Estimate): less than 5 gallons

Quantity Concentration of Material (Estimate): 24 X 20 1/2

Date of Spill: 12/17/14

Time Spill Started: AM 12:00 Time Spill Ended: PM 4:00

Time Spill was Reported to Antero Personnel: AM PM

Time Spill was Reported to Shalewater Personnel: AM 4:30 PM

4. Spill Location and Conditions:

Paid Location: Morris Pad

Route that truck was taking To: Wickham from Wickham

12/18/2014

PC181757

FOF No. 5 - Spill not reported to spill line (Spill 3)



12/22/2014

PC221776

FOF No. 5 - Spill not reported to spill line (Spill 3)



PC221777

FOF No. 5 - Spill not reported to spill line (Spill 3)



PC181752

FOF No. 5 - Additional spill area not reported to spill line (Spill 4)

Base Penalty Calculation

(pursuant to 47CSR1-6.1)

Responsible Party: Antero Resources
Appalachian Corp. Receiving Stream:

UT of Limestone Run

Treatment System Design Maximum Flow: N/A MGD

Treatment System Actual Average Flow: N/A MGD

Enter FOF# and rate each finding as to Potential and Extent.

1)	Potential for Harm Factor	Factor Range	FOF#											
			2a	4a	5a									
a)	Amount of Pollutant Released	1 to 3	2	1	1									
b)	Toxicity of Pollutant	0 to 3	1	1	1									
c)	Sensitivity of the Environment	0 to 3	1	1	1									
d)	Length of Time	1 to 3	1	1	1									
e)	Actual Exposure and Effects thereon	0 to 3	1	1	1									
Average Potential for Harm Factor			1	1	1	No								
2)	Extent of Deviation Factor	Factor Range												
	Degree of Non-Compliance	1 to 3	2	3	3									

Potential for Harm Factors:

- 1)c - Sensitivity of the Environment Potentially Affected (0 for "dead" stream)
- 1)d - Length of Time of Violation
- 1)e - Actual Human/Environmental Exposure and Resulting Effects thereon

Examples/Guidance:

Note: Rate as 1 for Minor, 2 for Moderate and 3 for Major. Rate as 0 if it does not apply.

Minor = exceedance of permit limit by <=40% for Avg. Monthly or <=100% for Daily Max., exceed numeric WQ standard by <= 100%, or report doesn't contain some minor information.

Moderate = exceedance of permit limit by >= 41% and <= 300% for Avg. Monthly, >= 101% and <= 600% for Daily Max., exceed numeric WQ standard by >= 101% and <= of 600% or report doesn't fully address intended subject matter.

Major = exceedance of permit limit by >= 301% for Avg. Monthly, >= 601% for Daily Max., exceed numeric WQ standard by >= 601%, failure to submit a report, failure to obtain a permit, failure to report a spill, etc. Note that a facility in SNC should be rated as major for length of time and degree of non-compliance.

Narrative WQ standard violations - case-by-case.

		Extent of Deviation from Requirement		
		Major	Moderate	Minor
Potential for Harm to Human Health or the Environment	Major	\$8,000 to \$10,000	\$6,000 to \$8,000	\$5,000 to \$6,000
	Moderate	\$4,000 to \$5,000	\$3,000 to \$4,000	\$2,000 to \$3,000
	Minor	\$1,500 to \$2,000	\$1,000 to \$1,500	Up to \$1,000

FOF #	Potential for Harm	Extent of Deviation	Penalty	Multiple Factor	Base Penalty
2a	Moderate	Moderate	\$3,200	1	\$3,200
4a	Minor	Major	\$2,000	1	\$2,000
5a	Minor	Major	\$2,000	1	\$2,000
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
0	FALSE	FALSE	FALSE	1	\$0
Total Base Penalty					\$7,200

3.

Penalty Adjustment Factors

(pursuant to 47CSR1-6.2)

Penalty Adjustment Factor

- 6.2.b.1 - Degree of or absence of willfulness and/or negligence - 0% to 30% increase
- 6.2.b.4 - Previous compliance/noncompliance history - 0% to 100% increase - based upon review of last three (3) years - Warning = maximum of 5% each, N.O.V. = maximum of 10% each, previous Order = maximum of 25% each - Consistent DMR violations for <1 year = 10% maximum, for >1 year but <2 years = 20% maximum, for >2 years but <3 years = 30% maximum, for >3 years = 40 % maximum
- 6.2.b.6 - Economic benefits derived by the responsible party (increase to be determined)
- 6.2.b.7 - Public Interest (increase to be determined)
- 6.2.b.8 - Loss of enjoyment of the environment (increase to be determined)
- 6.2.b.9 - Staff investigative costs (increase to be determined)
- 6.2.b.10 - Other factors

Size of Violator: 0 - 50% decrease

NOTE: This factor is not available to discharges that are causing a water quality violation. This factor does not apply to a commercial or industrial facility that employees or is part of a corporation that employees more than 100 individuals.

Avg. Daily WW Discharge Flow (gpd)	% Reduction Factor
< 5,000	50
5,000 to 9,999	40
10,000 to 19,999	30
20,000 to 29,999	20
30,000 to 39,999	10
40,000 to 99,999	5
> 100,000	0

Additional Other factors to be determined for increases or decreases on a case-by-case basis.

- Public Notice Costs (cost for newspaper advertisement)
- 6.2.b.2 - Good Faith - 10% decrease to 10% increase
- 6.2.b.3 - Cooperation with the Secretary - 0% to 10% decrease
- 6.2.b.5 - Ability to pay a civil penalty - 0% to 100% decrease

Base Penalty Adjustments

(pursuant to 47CSR1-6.2)

Penalty Adjustment Factor	% Increase	% Decrease	Base Penalty Adjustments
6.2.b.1 - Willfulness and/or negligence -	30		\$2,160
6.2.b.4 - Compliance/noncompliance history	25		\$1,800
6.2.b.6 - Economic benefits - (flat monetary increase)			\$0
6.2.b.7 - Public Interest - (flat monetary increase)			\$0
6.2.b.8 - Loss of enjoyment - (flat monetary increase)			\$0
6.2.b.9 - Investigative costs - (flat monetary increase)			\$0
6.2.b.10 - Other factors (size of violator)			\$0
6.2.b.10 - Additional Other Factors - Increase (flat monetary increase)			\$0
6.2.b.10 - Additional Other Factors - Decrease (flat monetary decrease)			\$0
Public Notice Costs (flat monetary increase)	\$30		\$30
6.2.b.2 - Good Faith - Increase			\$0
6.2.b.2 - Good Faith - Decrease			\$0
6.2.b.3 - Cooperation with the Secretary			\$0
6.2.b.5 - Ability to Pay			\$0
Penalty Adjustments			\$3,990
Penalty =			\$11,190

Estimated Economic Benefit Item	Estimated Benefit (\$)
Monitoring & Reporting	
Installation & Maintenance of Pollution Control Equipment	
O&M expenses and cost of equipment/materials needed for compliance	
Permit Application or Modification	
Competitive Advantage	
Estimated Economic Benefit	\$0
Comments: Economic benefit was considered but not applied.	