



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: Gassaway Baptist Church
Attn: Mark Stump, Pastor
56 Beall Drive
Gassaway, WV 26624

DATE: January 15, 2015

ORDER NO.: 7974

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 Gassaway Baptist Church.

FINDINGS OF FACT

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

1. Gassaway Baptist Church is conducting land disturbance activity in Gassaway, Braxton County, West Virginia. Gassaway Baptist Church was issued WV/NPDES Water Pollution Control Permit No. WV0115924, Registration No. WVR106006, on April 3, 2012.
2. On July 11, 2013, West Virginia Department of Environmental Protection (WVDEP) personnel conducted an inspection of the facility. During the inspection, violations of the following sections of the terms and conditions of Gassaway Baptist Church's WV/NPDES permit and WV Legislative Rules were observed and documented:
 - a. Section C.12. – Effluents covered by this permit failed to be of such quality so as not to cause a violation of applicable water quality standards. Specifically, sediment deposits were created in the Elk River below the sediment basin on the east end of the site.

Promoting a healthy environment.

- b. Section D.1. – The permittee failed to at all times properly operate and maintain all facilities and systems of treatment and control. Specifically, the permittee failed to properly install and maintain diversion ditches. Concentrated storm water flow was exiting from the west end of the site with no controls in place.
- c. Section G.4.c. – The permittee failed to modify its Storm Water Pollution Prevention Plan (SWPPP) to reflect a change in the scope of operation. Specifically, additional disturbance, which was not reflected in the original site plans, was taking place in the northwest portion of the site.
- d. 47CSR2 Section 3.2.b. – Gassaway Baptist Church caused conditions not allowable in waters of the State by creating sediment deposits on the bottom of the Elk River.

As a result of the aforementioned violations, Notice of Violation (NOV) Nos. I13-04-0711-GCM and I13-04-0711-2-GCM were issued to Gassaway Baptist Church.

3. On August 2, 2013, WVDEP personnel conducted an inspection of the facility. During the inspection, violations of the following sections of Gassaway Baptist Church's WV/NPDES permit and WV Legislative Rules were observed and documented:
 - a. Section G.4.e.2. – The permittee failed to properly implement controls. Specifically, silt fence was improperly installed, there was no basin inlet protection, and drop inlet protection was inadequate.
 - b. Section B. – The permittee failed to comply with the approved SWPPP. A storm water diversion on the western perimeter of project was not in place as detailed by the SWPPP.
 - c. Section G.4.c. – The permittee failed to modify its SWPPP when there was a change in design, construction, scope of operation, or maintenance, which had a significant effect on the potential for the discharge of pollutants to waters of the State, or the SWPPP proved to be ineffective in achieving the general objectives of controlling pollutants in storm water discharges. The SWPPP was not changed to include the northwest drop inlet and related Best Management Practices (BMPs). The SWPPP was not changed to address the lack of adequate treatment at the east side basin.
 - d. Section G.4.e.2.A.i. – The permittee failed to provide interim stabilization on areas where construction activities had temporarily ceased for more than fourteen (14) days.
 - e. Section G.4.e.2.A.ii.f. – The permittee failed to protect fill slopes on western and northern portions of project.
 - f. Section D.1. – The permittee failed to operate and maintain all erosion control devices. Sediment was present in the basin, erosion and sediment were observed in diversions, and the silt fence was inundated.
 - g. 47CSR2 Section 3.2.b. – Gassaway Baptist Church caused conditions not allowable in waters of the State by creating sediment deposits on the bottom of the Elk River.

As a result of the aforementioned violations, NOV No. I13-04-034-JHH was issued to Gassaway Baptist Church.

4. On September 20, 2013, WVDEP personnel conducted an inspection of the facility. During the inspection, violations of the following sections of WV Legislative Rules and Gassaway Baptist Church's WV/NPDES permit were observed and documented:
 - a. Section G.4.e.2. – The permittee failed to properly implement controls. Specifically, silt fence was improperly installed, there was no basin inlet protection, and drop inlet protection was inadequate.
 - b. Section G.4.e.2.A.ii.f. – The permittee failed to protect fill slopes on the western and northern portions of project.
 - c. Section D.1. – The permittee failed to operate and maintain all erosion control devices. Sediment was present in the basin, erosion and sediment were observed in diversions, and the silt fence was inundated.
 - d. 47CSR2 Section 3.2.a. – Gassaway Baptist Church caused conditions not allowable in waters of the State by creating two separate distinctly visible plumes of settleable solids in the Elk River.

As a result of the aforementioned violations, NOV No. I13-04-0711-GCM was issued to Gassaway Baptist Church.

5. On January 2, 2014, WVDEP personnel and representatives of Gassaway Baptist Church met to discuss the terms and conditions of this Order.
6. On January 16, 2014, WVDEP personnel conducted an inspection of the facility. During the inspection, violations of the following sections of Gassaway Baptist Church's WV/NPDES permit were observed and documented:
 - a. Section G.4.e.2. – The permittee failed to properly implement controls. Specifically, there were no perimeter controls around the topsoil stock pile or the western side of the disturbed area.
 - b. Section G.4.e.2.A.i. – The permittee failed to provide interim stabilization on the western side of the disturbed area where construction activities had temporarily ceased for more than fourteen (14) days.
 - c. Section G.4.e.2.A.ii.f. – The permittee failed to protect fill slopes on the western portion of the project.
 - d. Section D.1. – The permittee failed to operate and maintain all erosion control devices. Specifically, sediment was present in the trap, the trap lacked inlet protection, and the diversions were eroded and contained sediment deposits.
 - e. G.4.e.2.A.ii.k. – The permittee failed to use acceptable Best Management Practices. Specifically, straw bales were being used as erosion/sediment control devices.

As a result of the aforementioned violations, NOV No. I14-04-004-JHH was issued to Gassaway Baptist Church.

7. On January 16, 2014, WVDEP personnel received financial documents from Gassaway Baptist Church. The provided information was used to perform an economic analysis which evaluated Gassaway Baptist Church's ability to pay a civil administrative penalty.

8. On January 12, 2015, WVDEP personnel and representatives of Gassaway Baptist Church met to discuss the terms and conditions of this Order.

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. Gassaway Baptist Church shall immediately take all measures to initiate compliance with all terms and conditions of its WV/NPDES permit and pertinent laws and rules.
2. Within twenty (20) days of the effective date of this Order, Gassaway Baptist Church shall submit for approval a proposed plan of corrective action and schedule, outlining action items and completion dates for how and when Gassaway Baptist Church will achieve compliance with all terms and conditions of its WV/NPDES permit and pertinent laws and rules. The plan of corrective action shall make reference to WV/NPDES Permit No. WV0115924, Registration No. WVR106006, and Order No. 7974. The plan of corrective action shall be submitted to:

**WVDEP Environmental Inspector Supervisor
SE Regional Environmental Enforcement Office
254 Industrial Drive
Oak Hill, WV 25901**

A copy of this plan shall be submitted to:

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

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.

3. Because of Gassaway Baptist Church's Legislative Rule violations, Gassaway Baptist Church shall be assessed a civil administrative penalty of nineteen thousand four hundred ten dollars (\$19,410). Eleven thousand nine hundred ten dollars (\$11,910) of the civil administrative penalty shall be held in abeyance for a period of one (1) year after the effective date of this Order. The remaining seven thousand five hundred dollars (\$7,500) of the civil administrative penalty shall be paid to the West Virginia Department of Environmental Protection for deposit in the Water Quality Management Fund in accordance with the following schedule:

Payment 1 in the amount of \$1,250 due on or before March 1, 2015.

- Payment 2 in the amount of \$1,250 due on or before April 1, 2015.
- Payment 3 in the amount of \$1,250 due on or before May 1, 2015.
- Payment 4 in the amount of \$1,250 due on or before June 1, 2015.
- Payment 5 in the amount of \$1,250 due on or before July 1, 2015.
- Payment 6 in the amount of \$1,250 due on or before August 1, 2015.

Gassaway Baptist Church agrees to pay the eleven thousand nine hundred ten dollars (\$11,910) held in abeyance within thirty (30) days of notice from WVDEP that any additional construction activities conducted by Gassaway Baptist Church have caused conditions not allowable in waters of the State, as described in WV Legislative Rule 47CSR2 Section 3.2.

Payments made pursuant to this paragraph are not tax-deductible for purposes of state or federal law. **Payment shall be mailed to:**

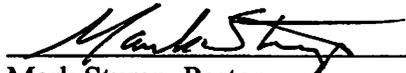
**Chief Inspector
Environmental Enforcement – Mail Code #031328
WVDEP
601 57th Street SE
Charleston, WV 25304**

OTHER PROVISIONS

1. Gassaway Baptist Church 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, Gassaway Baptist Church 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, Gassaway Baptist Church 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 Gassaway Baptist Church 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, Gassaway Baptist Church 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 Gassaway Baptist Church becomes aware of such a delay, notification shall be provided to the Director/Chief Inspector and Gassaway Baptist Church 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 Gassaway Baptist Church 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 Gassaway Baptist Church (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 Gassaway Baptist Church 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 Gassaway Baptist Church 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 Gassaway Baptist Church, its successors and assigns.
7. This Order shall terminate upon Gassaway Baptist Church's notification of full compliance with the "Order for Compliance" and verification of this notification by WVDEP.



Mark Stump, Pastor
Gassaway Baptist Church

1-20-15

Date

Public Notice begin:

Date

Public Notice end:

Date

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

Date

revised March 2013

RECEIVED

JAN 23 2015

**ENVIRONMENTAL
ENFORCEMENT**

Photo Log
Gassaway Baptist Church Consent Order



West side of the site – 7/11/2013



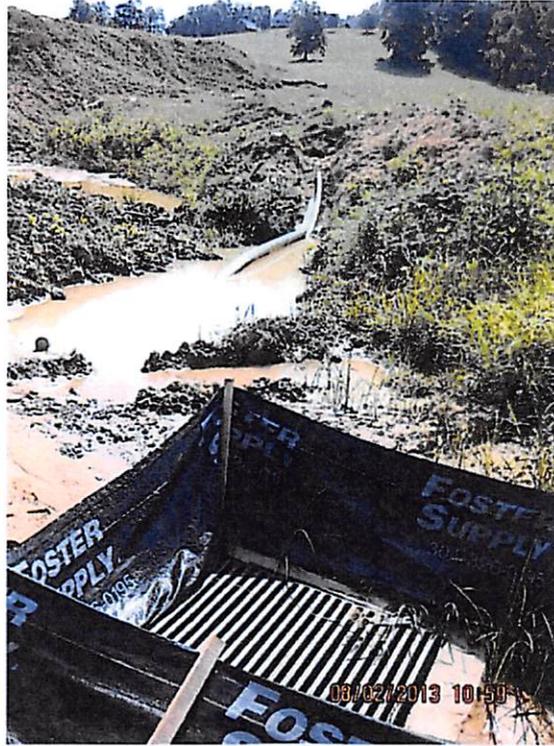
7/11/13 - Unprotected drop inlet below West side of site.

Photo Log
Gassaway Baptist Church Consent Order



07/11/13 - Sediment trap's discharge, causing deposits in Elk River.

Photo Log
Gassaway Baptist Church Consent Order



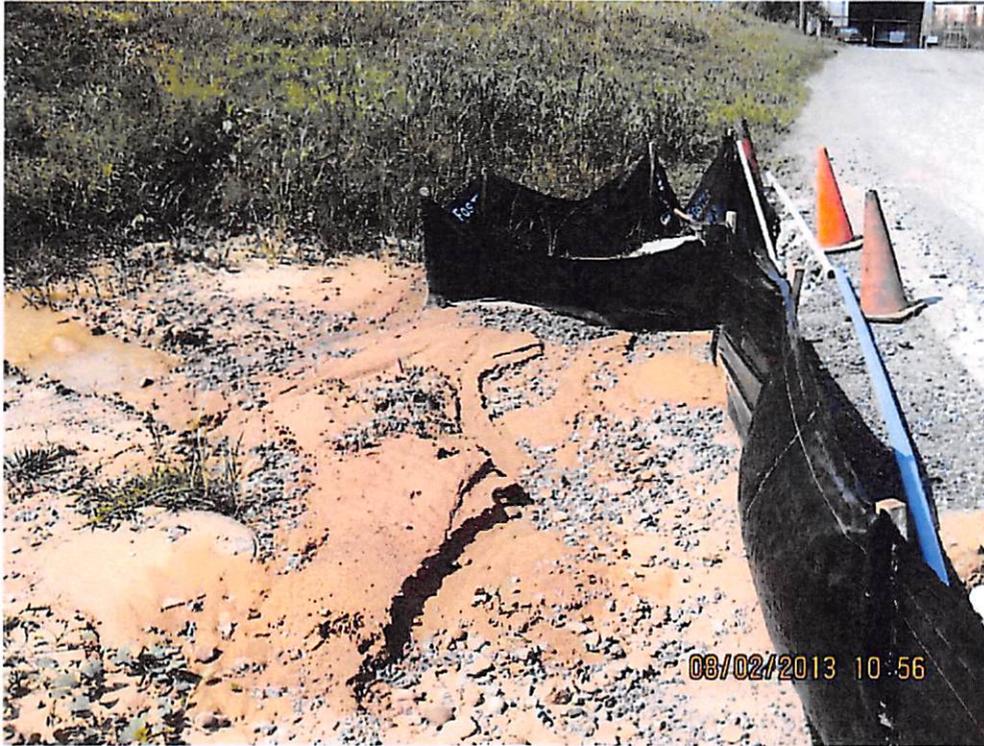
8/2/13 - Drop inlet on northwest corner of project.

Photo Log
Gassaway Baptist Church Consent Order



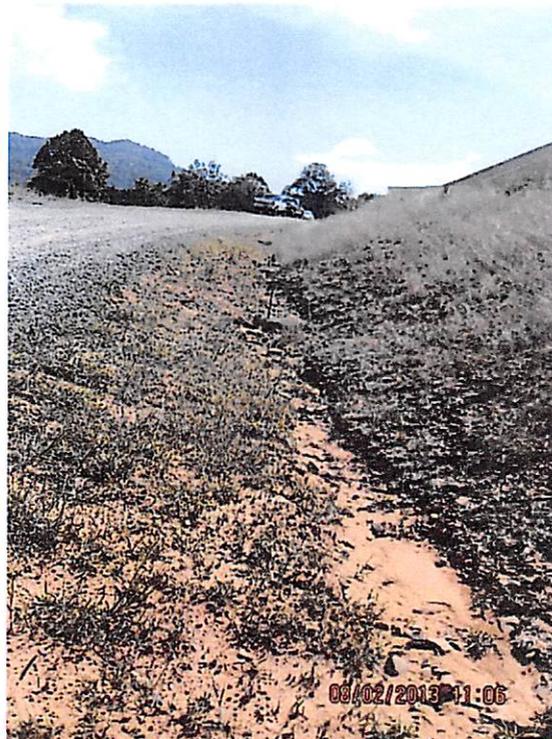
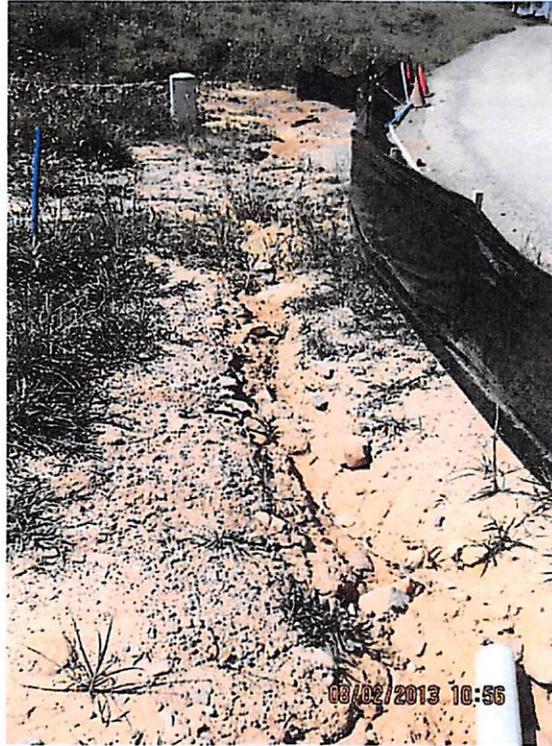
8/2/13 - Silt fence around drop inlet improperly installed.

Photo Log
Gassaway Baptist Church Consent Order



8/2/13 - Sediment deposits in diversions.

Photo Log
Gassaway Baptist Church Consent Order



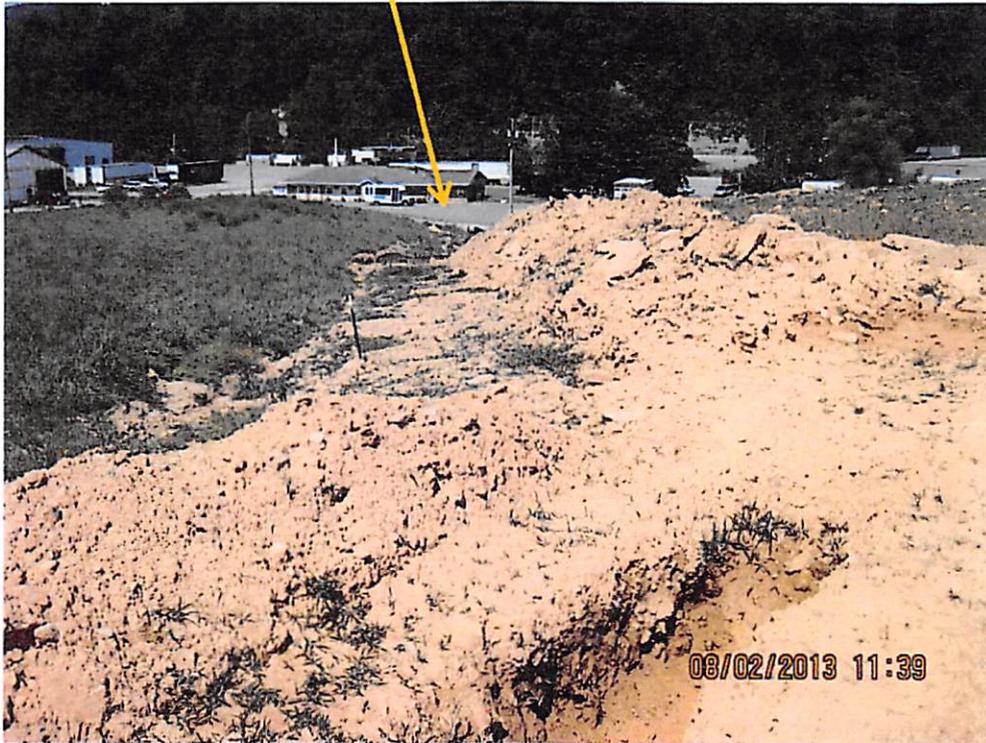
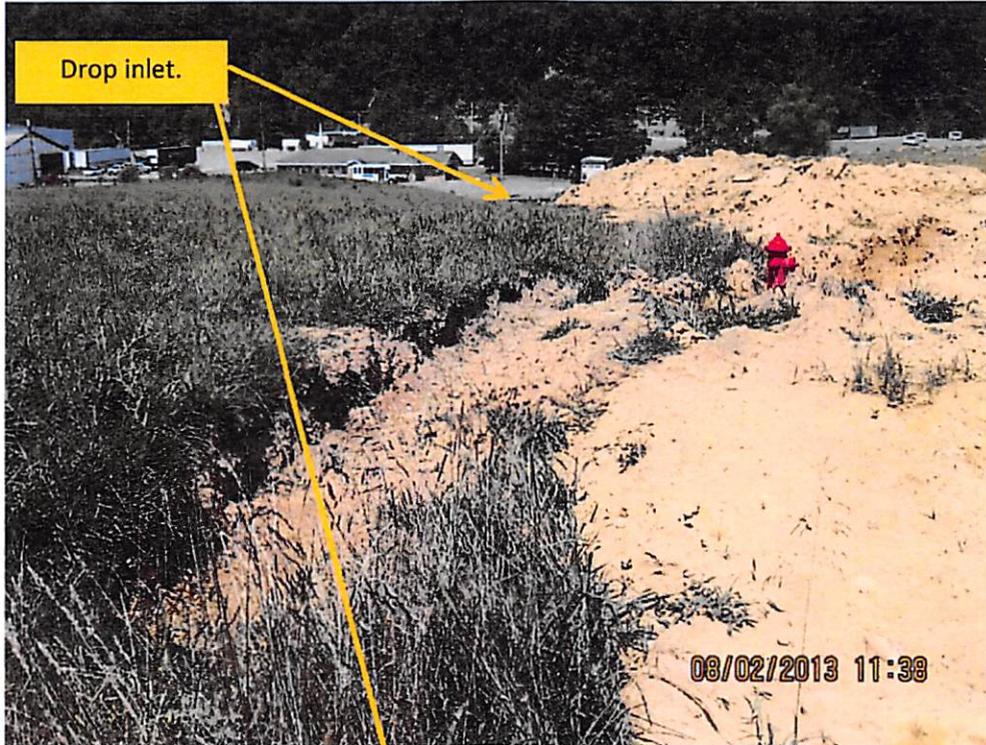
8/2/13 - Erosion noted in diversions.

Photo Log
Gassaway Baptist Church Consent Order



8/2/13 - No established diversions to northwest portion of project.

Photo Log
Gassaway Baptist Church Consent Order



8/2/13 - No established diversions to northwest portion of project.

Photo Log
Gassaway Baptist Church Consent Order



8/2/13 - Improperly installed silt fence on northwest portion of project.

Photo Log
Gassaway Baptist Church Consent Order



8/2/13 - Silt fence not properly installed or maintained in northwest portion of site.



8/2/13 - Fill slopes on the north and western sides of the project have not been protected. Significant numbers of erosion rills and gullies were noted on these fill slopes.

Photo Log
Gassaway Baptist Church Consent Order



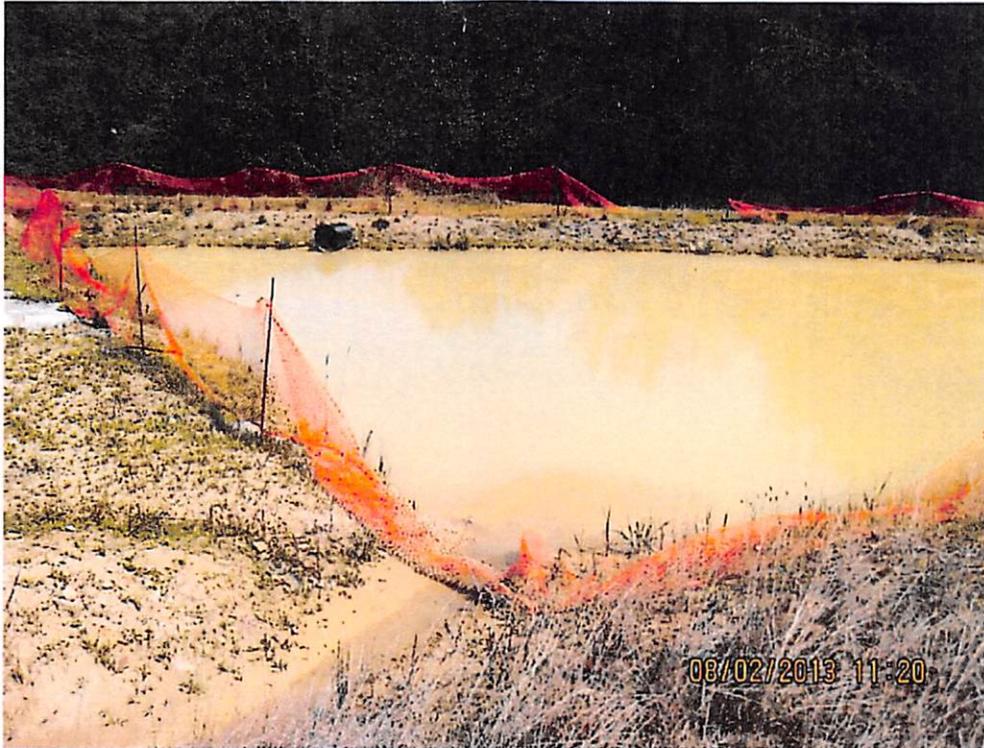
8/2/13 - Fill slopes on the north and western sides of the project have not been protected. Significant numbers of erosion rills and gullies were noted on these fill slopes.

Photo Log
Gassaway Baptist Church Consent Order



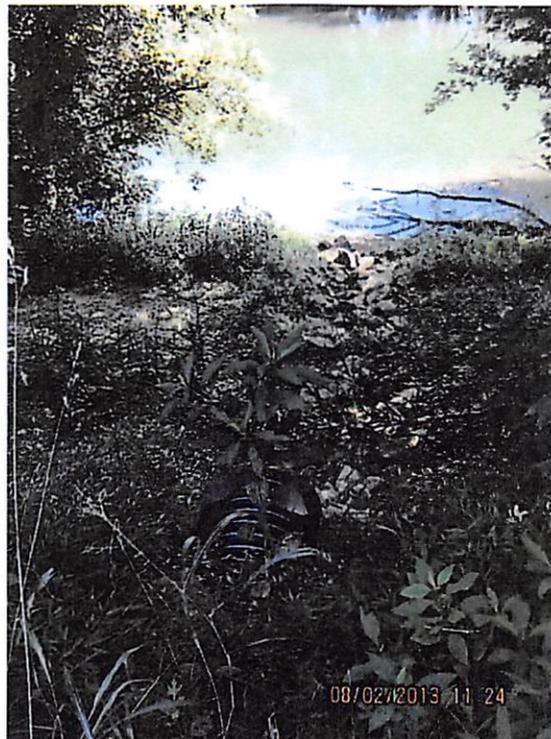
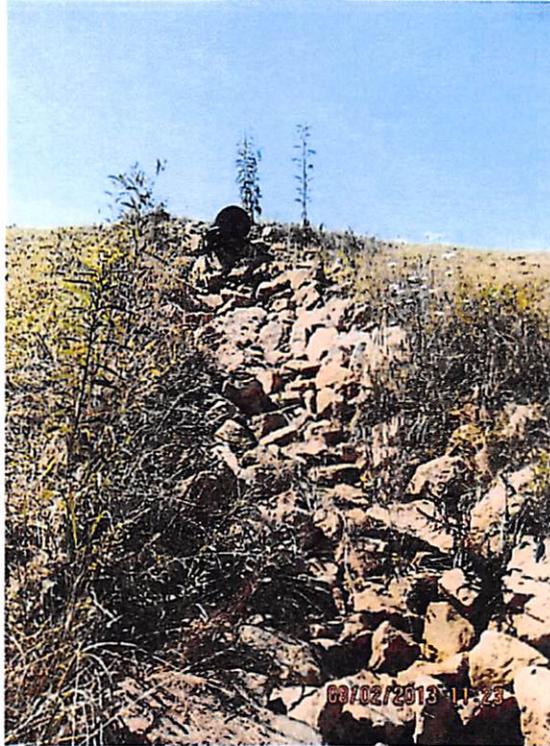
8/2/13 - Fill slopes on the north and western sides of the project have not been protected. Significant numbers of erosion rills and gullies were noted on these fill slopes.

Photo Log
Gassaway Baptist Church Consent Order



8/2/13 - Basin on east side, there is no inlet protection, a sediment delta exists near inlet, and the design is conducive to short circuiting (inadequate settling).

Photo Log
Gassaway Baptist Church Consent Order



8/2/13 - Basin discharge to Elk River.

Photo Log
Gassaway Baptist Church Consent Order



8/2/13 - Sediment deposits were noted in the Elk River at the discharge terminus of the basin.

Photo Log
Gassaway Baptist Church Consent Order



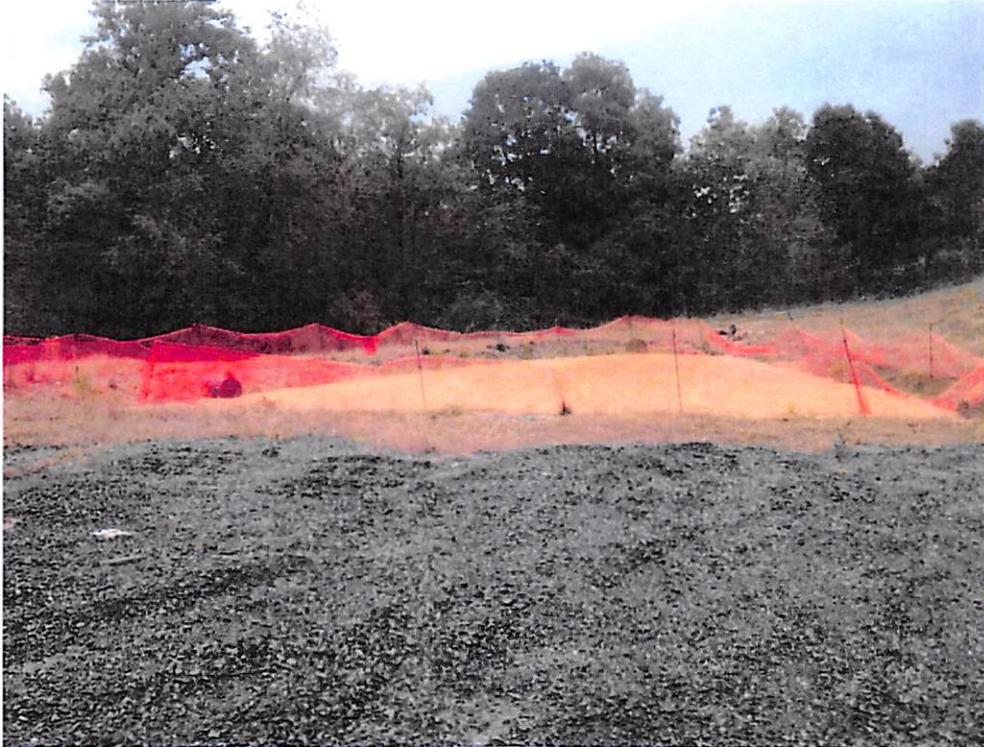
8/2/13 - Large portions of project where no activity has occurred for 14 days have not received temporary stabilization.

Photo Log
Gassaway Baptist Church Consent Order



8/2/13 - Large portions of project where no activity has occurred for 14 days have not received temporary stabilization.

Photo Log
Gassaway Baptist Church Consent Order



09/20/2013 - Settling basin on east portion of site.



09/20/2013 - Discharge from east settling basin causing conditions not allowable in Elk River.

Photo Log
Gassaway Baptist Church Consent Order



09/20/2013 - Ditch line leading to northwest drop inlet.



09/20/2013 - Newly installed northwest settling basin.

Photo Log
Gassaway Baptist Church Consent Order



09/20/2013 - Newly installed northwest settling basin and discharge.



09/20/2013 - Discharge from northwest settling basin.

Photo Log
Gassaway Baptist Church Consent Order

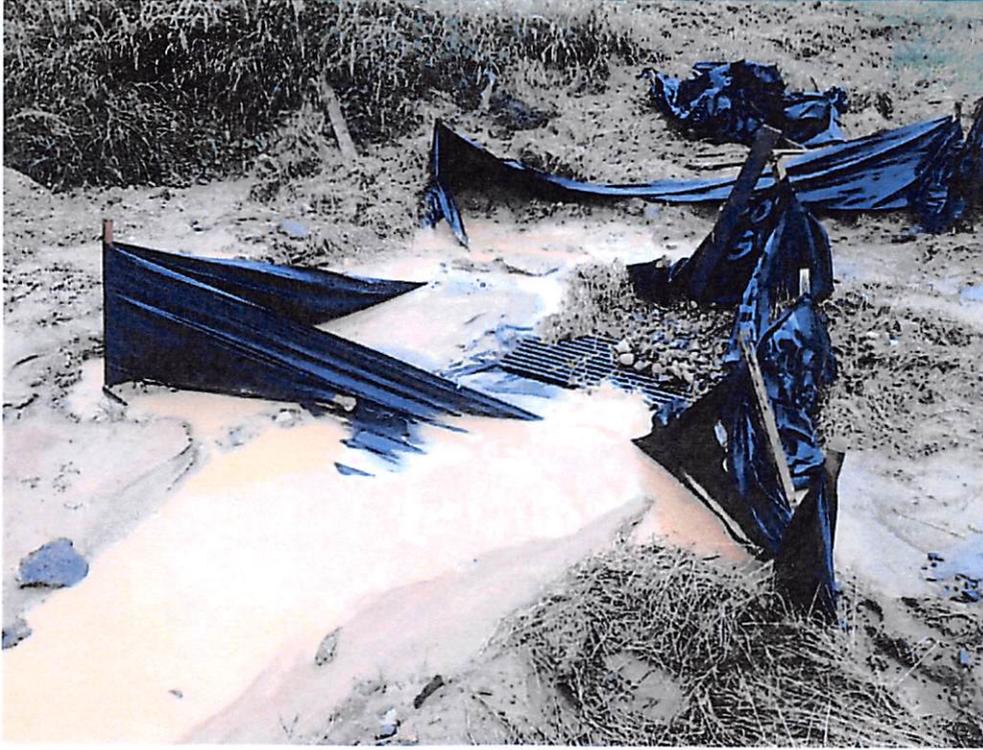


09/20/2013 - Discharge from northeast settling basin and improperly maintained silt fence.



09/20/2013 - Drop inlet on northwest portion of site.

Photo Log
Gassaway Baptist Church Consent Order



09/20/2013 - Drop inlet on northwest portion of site.



09/20/2013 - Northwest drop inlet discharge causing condition not allowable in Elk River.

Photo Log
Gassaway Baptist Church Consent Order



09/20/2013 - Northwest drop inlet discharge causing condition not allowable in Elk River.



1/16/14 – The diversion on the northern perimeter of the site was eroded and not well established.

Photo Log
Gassaway Baptist Church Consent Order



1/16/14 – The small sediment trap at the terminus of the diversion below the fill slope needed inlet protection and required sediment removal.

Photo Log
Gassaway Baptist Church Consent Order



1/16/14 -Straw bales were used as checks in diversion on the northern perimeter of site. The diversion was eroded and contained sediment.

Photo Log
Gassaway Baptist Church Consent Order



1/16/14 – The disturbed area on the western side lacked temporary stabilization/perimeter controls.

Photo Log
Gassaway Baptist Church Consent Order



1/16/14 - Portions of the parking lot fill slope were not stabilized and were eroded.

Photo Log
Gassaway Baptist Church Consent Order



1/16/14 - Portions of the parking lot fill slope were not stabilized and were eroded.

Photo Log
Gassaway Baptist Church Consent Order



1/16/14 – The diversion was eroded and contained sediment at the southeastern perimeter (to the sediment basin). Straw bales were being used as checks.

Photo Log
Gassaway Baptist Church Consent Order



1/16/14 - No perimeter controls around the topsoil stock pile on the eastern slope of the project.

Base Penalty Calculation

(pursuant to 47CSR1-6.1)

Responsible Party:

Gassaway Baptist Church

Receiving Stream:

Elk River

Treatment System Design Maximum Flow: _____ MGD

Treatment System Actual Average Flow: _____ MGD (if known)

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

1)	Potential for Harm Factor	Factor Range	FOF#												
			2.b.	2.c.	2.d.	3.a.	3.b.	3.c.	3.d.	3.e.	3.f.	3.g.	4.a.	4.b.	4.c.
a)	Amount of Pollutant Released	1 to 3	1	1	1	1	1	1	1	1	1	1	1	1	1
b)	Toxicity of Pollutant	0 to 3	1	0	1	1	1	0	1	1	1	1	1	1	1
c)	Sensitivity of the Environment	0 to 3	1	0	1	1	1	0	1	1	1	1	1	1	1
d)	Length of Time	1 to 3	1	1	1	1	1	2	1	1	2	1	2	2	3
e)	Actual Exposure and Effects thereon	0 to 3	0	0	1	0	0	0	0	0	0	1	0	0	0
Average Potential for Harm Factor			0.8	0.4	1	0.8	0.8	0.6	0.8	0.8	1	1	1	1	1.2
2)	Extent of Deviation Factor	Factor Range													
	Degree of Non-Compliance	1 to 3	1	1	1	1	1	2	1	1	2	1	3	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 $\leq 40\%$ for Avg. Monthly or $\leq 100\%$ for Daily Max., exceed numeric WQ standard by $\leq 100\%$, or report doesn't contain some minor information.

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

Major = exceedance of permit limit by $\geq 301\%$ for Avg. Monthly, $\geq 601\%$ for Daily Max., exceed numeric WQ standard by $\geq 601\%$, 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
2.b.	Minor	Minor	\$800	1	\$800
2.c.	Minor	Minor	\$400	1	\$400
2.d.	Minor	Minor	\$1,000	1	\$1,000
3.a.	Minor	Minor	\$800	1	\$800
3.b.	Minor	Minor	\$800	1	\$800
3.c.	Minor	Moderate	\$1,300	1	\$1,300
3.d.	Minor	Minor	\$800	1	\$800
3.e.	Minor	Minor	\$800	1	\$800
3.f.	Minor	Moderate	\$1,500	1	\$1,500
3.g.	Minor	Minor	\$1,000	1	\$1,000
4.a	Minor	Major	\$2,000	1	\$2,000
4.b.	Minor	Major	\$2,000	1	\$2,000
4.c.	Moderate	Major	\$4,200	1	\$4,200
4.d.	Minor	Moderate	\$1,500	2	\$3,000
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
Total Base Penalty					\$20,400

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 -	15		\$3,060
6.2.b.4 - Compliance/noncompliance history			\$0
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		10	(\$2,040)
6.2.b.3 - Cooperation with the Secretary		10	(\$2,040)
6.2.b.5 - Ability to Pay			\$0
Penalty Adjustments			(\$990)
Penalty =			\$19,410

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:	