



west virginia department of environmental protection

Environmental Enforcement
601 57th Street SE
Charleston, WV 25304
Telephone: (304) 926-0470 Fax: (304) 926-0488

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

January 16, 2013

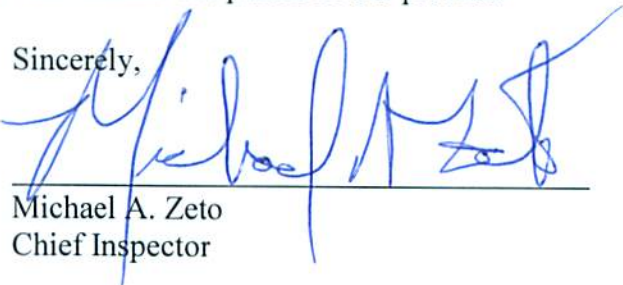
M3 Appalachia Gathering, LLC
ATTN: Frank D. Tsuru, Manager
742 Fairmont Avenue
Westover, WV 26501

CERTIFIED RETURN RECEIPT REQUESTED
91 7199 9991 7031 5535 5048
RE: Violation of Chapter 22, Article 11
of the WV State Code

Dear Mr. Tsuru:

Enclosed is revised CONSENT ORDER NUMBER 7746 dated January 16, 2013. This action is based upon the investigation and recommendation of the West Virginia Department of Environmental Protection's (WVDEP) Environmental Enforcement unit in response to M3 Appalachia Gathering, LLC violating Chapter 22, Article 11 of the WV State Code at its facilities located in Marion, Monongalia and Harrison Counties, West Virginia. This revision is based upon your recent meeting with David C. Simmons, Enforcement Hearing Officer. This administrative settlement is being offered on behalf of the director of the Division of Water and Waste Management.

Please review, sign and return the original copy of the revised ORDER to me within five (5) working days of receipt. Subsequently, WVDEP will initiate the public notice process.

Sincerely,

Michael A. Zeto
Chief Inspector

Enclosure

cc: Scott G. Mandirola, Director, DWWM (via e-mail)
Yogesh Patel, Asst. Director, DWWM/Permits (via e-mail)
Joseph M. Hickman, Assistant Chief Inspector, EE/WW (via e-mail)
Jeremy Bandy, Assistant Chief Inspector, EE (via e-mail)
David C. Simmons, Enforcement Hearing Officer, EE (via e-mail)
Laura McGee, Environmental Resources Specialist, EE (via e-mail)
Brad Swiger, Environmental Inspector Supervisor, EE/WW (via e-mail)
James Tallman, Environmental Inspector, EE/WW (via e-mail)
Shyrel Moellendick, MSSS, EE (via e-mail)

revised October 2012

Promoting a healthy environment.



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

TO: M3 Appalachia Gathering, LLC
ATTN: Frank D. Tsuru, Manager
742 Fairmont Avenue
Westover, WV 26501

DATE: January 16, 2013

ORDER NO.: 7746

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 M3 Appalachia Gathering, LLC (hereinafter "Momentum").

FINDINGS OF FACT

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

1. Momentum operates a natural gas gathering company in West Virginia.
2. Construction activities associated with Momentum natural gas pipelines located in Marion County, Monongalia County, and Harrison County, West Virginia, frequently traverse State waters. The construction project is identified as M3 Appalachian Gathering System.
3. On May 1, 2012, West Virginia Department of Environmental Protection (WVDEP) personnel responded to a release of drilling mud from a horizontal directional drilling activity in Marion County, West Virginia. During the response, WVDEP personnel requested that drilling mud and any soil contacting drilling mud be disposed of in a landfill. In addition, WVDEP personnel requested a copy of landfill receipts as proof of proper disposal. The receipts were received by WVDEP on November 28, 2012. During the response, a violation of the following section of WV Legislative Rules was observed and documented:

Promoting a healthy environment.

- a. 47CSR2 Section 3.2.a.-Momentum caused conditions not allowable in waters of the State by creating distinctly visible floating, suspended, and/or settleable solids in the Monongahela River and unnamed tributaries thereof.
4. On May 16, 2012, WVDEP personnel conducted an inspection of the construction project. During the inspection, violations of the following sections of WV Legislative Rules were observed and documented:
 - a. 47CSR2 Section 3.2.a.-Momentum caused conditions not allowable in waters of the State by creating distinctly visible floating, suspended, and/or settleable solids in Piney Run.
 - b. 47CSR2 Section 3.2.f.-Momentum caused conditions not allowable in waters of the State by creating a distinctly visible color in Piney Run.

As a result of the aforementioned violations, Notice of Violation (NOV) No. NW-BCS-051612-001 was issued to Momentum.

5. On June 5, 2012, WVDEP personnel conducted an inspection of the construction project. During the inspection, a violation of the following section of WV Legislative Rules was observed and documented:
 - a. 47CSR2 Section 3.2.a.- Momentum caused conditions not allowable in waters of the State by creating distinctly visible floating, suspended, and/or settleable solids in Jakes Run and unnamed tributaries thereof.

As a result of the aforementioned violation, NOV No. NW-JGT--060512-001 was issued to Momentum.

6. On June 6, 2012, in response to NOV No. NW-BCS-051612-001, WVDEP received a Plan of Corrective Action (POCA) from Momentum. Outlined in the POCA were the following:
 - a. Stream banks were graded, seeded, and mulched or covered with curlex matting.
 - b. Post-construction Best Management Practices (BMPs), including water bars, curlex matting, seeding, and silt fence or compost filter sock were to be installed on adjacent stream crossings.
 - c. Temporary bridges in the area were to be repaired with additional BMPs installed downstream.
 - d. The following additional project-wide procedures were to be implemented:
 - i. At least one Environmental Inspector (EI) would be required to coordinate with the pipeline construction supervisor on a daily basis to ensure Erosion and Sediment (E and S) BMPs were installed and maintained.
 - ii. Stream diversions would be monitored closely and would require the installation of velocity dissipaters.
 - iii. Dewatering would be closely monitored, and filter bags would be placed in vegetative areas per WVDEP guidelines.
 - iv. Work areas would be cleaned of trash and debris at the end of each day.

- v. Silt fencing along the Right-of-Way (ROW) would be monitored to prevent failure.
 - vi. Each tie-in crew would have an environmental crew available for installing post-construction BMPs.
7. On June 26, 2012, in response to NOV No. NW-JGT--060512-001, WVDEP received a POCA from Momentum. Outlined in the POCA were the following:
- a. The temporary bridge on Statler Run Road was repaired.
 - b. Additional BMPs were installed, including erosion control blankets, silt fence, and compost filter socks.
 - c. Momentum met with the management of the construction contractor, Sheehan Pipe Line Company, to discuss issues associated with the project culminating in a project-wide shut down on June 18, 2012.
 - d. Workforce would be held responsible and accountable for ensuring compliance and functionality of all BMPs.
 - e. Any BMPs affected during the work day would be replaced and/or repaired by the end of the day.
 - f. Additional personnel would be employed to help prevent environmental issues in the future.
8. On June 9, 2012, WVDEP personnel conducted an inspection of the construction. During the inspection, a violation of the following section of WV Legislative Rules was observed and documented:
- a. 47CSR2 Section 3.2.a.- Momentum caused conditions not allowable in waters of the State by creating distinctly visible floating, suspended, and/or settleable solids in Tevebaugh Creek.

As a result of the aforementioned violation, NOV No. NWJGT--060912-001 was issued to Momentum.

9. On June 15, 2012, at Momentum's request, WVDEP conducted a formal meeting at the WVDEP Fairmont Regional Office. Outlined during the meeting were the following:
- a. Momentum planned on idling blasting operations associated with construction utilities.
 - b. WVDEP stated that it considered blasting operations in streambeds to be included in the original twenty-four (24) hour timeframe outlined in the WV Division of Natural Resources (WVDNR) Right of Entry Permit.
 - c. Momentum stated that it would attempt to modify the timetable for working in the streambed to comply with the intent of the WVDNR Right of Entry Permit.
 - d. Momentum stated that it would provide a copy of E and S controls and a list of pending locations for blasting operations for WVDEP to review.
 - e. Momentum stated that it would place an increased emphasis on EI vigilance and remediation efforts on all affected streambeds.

10. On July 3, 2012, in response to NOV No. NW-JGT--060912-001, WVDEP received a POCA from Momentum. Outlined in the POCA were the following:
- a. Momentum installed E and S BMPs, including water bars, wire-backed silt fence, and compost filter socks, leading up to Tevebaugh Creek.
 - b. Momentum emphasized the increase of personnel who address environmental issues and its commitment to preventing issues in the future.
11. On August 31, 2012, WVDEP personnel responded to a release of bentonite drilling mud from a horizontal directional drilling activity in Monongalia County, West Virginia. During the response, violations of the following sections of WV Legislative Rules were observed and documented:
- a. 47CSR2 Section 3.2.a.- Momentum caused conditions not allowable in waters of the State by creating distinctly visible floating, suspended, and/or settleable solids in Dunkard Creek.
 - b. 47CSR2 Section 3.2.f.- Momentum caused conditions not allowable in waters of the State by creating a distinctly visible color in Dunkard Creek.

As a result of the aforementioned violations, NOV No. NW-JGT--083112-001 was issued to Momentum.

12. On September 21, 2012, in response to NOV No. NW-JGT--083112-001, WVDEP received a POCA from Momentum. Outlined in the POCA were the following:
- a. Momentum would focus on containment and monitoring until drilling is completed on Dunkard Creek.
 - b. Momentum utilized pump trucks to remove drilling mud from the containment area.
 - c. Any drilling mud waste would be disposed of properly per WVDEP's requirements.
 - d. Momentum would notify WVDEP when drilling activities are completed, containment materials are removed, and the site is remediated.
13. On October 2, 2012, WVDEP personnel responded to a release of bentonite drilling mud from a horizontal directional drilling activity in Monongalia County, West Virginia. During the response, violations of the following sections of WV Legislative Rules were observed and documented:
- a. 47CSR2 Section 3.2.a.- Momentum caused conditions not allowable in waters of the State by creating distinctly visible floating, suspended, and/or settleable solids in Dunkard Creek.
 - b. 47CSR2 Section 3.2.f.- Momentum caused conditions not allowable in waters of the State by creating a distinctly visible color in Dunkard Creek.

As a result of the aforementioned violations, NOV No. NW-JGT-100212-001 was issued to Momentum.

14. On November 28, 2012, at Momentum's request, WVDEP conducted a formal meeting at the WVDEP Charleston Headquarters. Outlined during the meeting were the following:
 - a. Momentum's past NOVs.
 - b. Momentum stated the items that it plans to include in its plan of corrective action.
 - c. Momentum stated that it would seek WV/NPDES General Water Pollution Control Permit for Stormwater Associated with Construction Activities for all of its future construction activities in West Virginia.
 - d. Momentum stated that it would continue to place an increased emphasis on EI vigilance and remediation efforts on all affected streambeds.

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. Momentum shall immediately take all measures to initiate compliance with all pertinent laws and rules.
2. Within twenty (20) days of the effective date of this Order, Momentum shall submit for approval a proposed plan of corrective action and schedule, outlining action items and completion dates for how and when Momentum will achieve compliance with all pertinent laws and rules. The plan of corrective action shall be submitted to:

**WVDEP Environmental Inspector Supervisor
NW Regional Environmental Enforcement Office
2031 Pleasant Valley Road
Fairmont, WV 26554**

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. Momentum shall seek and secure all appropriate permits from local, state and federal authorities prior to initiation of all future construction activities.
4. Momentum shall apply for coverage under WV/NPDES General Water Pollution Control Permit for Stormwater Associated with Construction Activities for all future activities with one acre or greater of land disturbance.

5. Because of Momentum's Legislative Rule violations, Momentum shall be assessed a civil administrative penalty of thirty-seven thousand eight hundred thirty dollars (\$37,830) 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

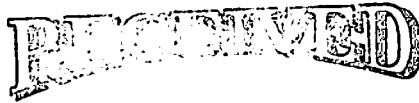
1. Momentum hereby waives its right to appeal this Order under the provisions of Chapter 22, Article 11, Section 21 of the Code of West Virginia. Under this Order, Momentum agrees to take all actions required by the terms and conditions of this Order and consents to and will not contest the Director's jurisdiction regarding this Order. However, Momentum 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 Momentum 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, Momentum 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 Momentum becomes aware of such a delay, notification shall be provided to the Director/Chief Inspector and Momentum 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 Momentum 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 Momentum (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 Momentum 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 Momentum 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 Momentum, its successors and assigns.
7. This Order shall terminate upon Momentum's notification of full compliance with the "Order for Compliance" and verification of this notification by WVDEP.

Frank D. Tsuru
Frank D. Tsuru, Manager
M3 Appalachia Gathering, LLC

January 18, 2013
Date

Public Notice begin:



JAN 23 2013

Date

Public Notice end:

ENVIRONMENTAL
ENFORCEMENT

Date

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

Date



Photo 1. M3 inadvertent release of drilling mud on Monongahela River HDD (Horizontal Directional Drill) activity.



Photo 2. Additional aerial photography of M3 Monongahela River HDD activity.



Photo 3. M3 Monongahela River HDD containment.



Photo 4. M3 Monongahela River HDD activity with additional release.



Photo 5. Site of inadvertent release of drilling mud from HDD activity into a UT of Monongahela River.



Photo 6. UT of Monongahela River.



Photo 7. M3 stream crossing of Jake Run in Monongalia County.



Photo 8. M3 stream crossing of Jake Run in Monongalia County.



Photo 9. E&S BMPs in need of maintenance and/or repair on a stream crossing of Jake Run.



Photo 10. Sediment leaving M3 project site into Jake Run, a violation of State Code 47CSR2-3.



Photo 11. Use of hay bales as a primary E&S BMP (hay bales in need of maintenance and/or repair) and no bank stabilizer visible on Tevebaugh Creek in Marion County.



Photo 12. Stream crossing, post-blasting, on Tevebaugh Creek in Marion County with hay bales as primary E&S BMP.



Photo 13. M3 inadvertent release of drilling mud due to HDD activity on Dunkard Creek in Monongalia County.



Photo 14. Containment around inadvertent release on Dunkard Creek.



Photo 15. Containment around ingress to inadvertent release sites on Dunkard Creek.



Photo 16. Second inadvertent release due to HDD activity on Dunkard Creek in Monongalia County.



Photo 17. Sediment blanket on bed of Dunkard Creek due to inadvertent release of drilling mud.



Photo 18. Expanded area influenced by inadvertent release of drilling mud into Dunkard Creek.



Photo 19. Original containment area for inadvertent release into Dunkard Creek (shown at date of second release).



Photo 20. Containment around furthest-upstream inadvertent release into Dunkard Creek (showing turbidity curtain and sandbags).

Base Penalty Calculation

(pursuant to 47CSR1-6.1)

Responsible Party: M3 Appalachia Gathering, LLC Receiving Stream: Piney Run, Tevebaugh Creek, Dunkard Creek

Treatment System Design Maximum Flow: N/A MGD

Treatment System Actual Average Flow: N/A MGD (if known)

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

1)	Potential for Harm Factor	Factor Range	FOF#												
			3a	4a	4b	5a	8a	11a	11b	13a	13b				
a)	Amount of Pollutant Released	1 to 3	2	2	2	2	2	2	2	2	2				
b)	Toxicity of Pollutant	0 to 3	1	1	1	1	1	1	1	1	1				
c)	Sensitivity of the Environment	0 to 3	1	1	1	1	1	1	1	1	1				
d)	Length of Time	1 to 3	1	1	1	1	1	1	1	1	1				
e)	Actual Exposure and Effects thereon	0 to 3	1	1	1	1	1	1	1	1	1				
Average Potential for Harm Factor			1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	No	No	No	No
2)	Extent of Deviation Factor	Factor Range													
	Degree of Non-Compliance	1 to 3	3	3	3	3	3	3	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 <=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
3a	Moderate	Major	\$4,200	1	\$4,200
4a	Moderate	Major	\$4,200	1	\$4,200
4b	Moderate	Major	\$4,200	1	\$4,200
5a	Moderate	Major	\$4,200	1	\$4,200
8a	Moderate	Major	\$4,200	1	\$4,200
11a	Moderate	Major	\$4,200	1	\$4,200
11b	Moderate	Major	\$4,200	1	\$4,200
13a	Moderate	Major	\$4,200	1	\$4,200
13b	Moderate	Major	\$4,200	1	\$4,200
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					\$37,800

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 -	20		\$7,560
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	(\$3,780)
6.2.b.3 - Cooperation with the Secretary		10	(\$3,780)
6.2.b.5 - Ability to Pay			\$0
Penalty Adjustments			\$30
Penalty =			\$37,830

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:	