MSD
Metropolitan Sewer District

Louisville and Jefferson County Metropolitan Sewer District
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July 11, 2013

John P. Sheesley
Assistant Regional Counsel
United States Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

Subject: Operation and Maintenance Costs – Lees Lane Landfill Superfund Site, Jefferson County, Kentucky, Administrative Order on Consent, US EPA Docket No. 91-32-C

Dear Mr. Sheesley:

On January 9, 2013 a conference call regarding the Lees Lane Landfill Superfund Site was conducted between United States Environmental Protection Agency Region 4 (US EPA), Kentucky Department of Environmental Protection – Division of Waste Management (KDWM), and Louisville and Jefferson County Metropolitan Sewer District (MSD). During that conference call, MSD raised the issue that it believed that it had satisfied the agreed upon expenditure cap concerning the maintenance and operation costs at the landfill as set forth in the Administrative Consent Order, US EPA Docket No. 91-32-C. In this letter, MSD is providing documentation in regards to the satisfaction of operation and maintenance costs requirement.

As background, under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 USC §§ 9607, 9613, US EPA sought to recover past costs and estimated future maintenance and operations costs of the landfill. In 1989, US EPA estimated its past response costs to be $3,000,000, and estimated an additional $500,000 in future operations and maintenance costs. In 1989, MSD was identified as one of 30 potentially responsible parties, with 6% of the responsibility for payment. Based on that allocation, MSD's responsibility would have been $210,000. However, on behalf of Jefferson County, MSD made the offer to undertake and perform maintenance and operations work in lieu of a cash settlement. In 1991, MSD entered into the above-referenced Administrative Order on Consent with the US EPA which defines MSD's obligations in regard to the monitoring, operations and maintenance of the Lees Lane Landfill site.

The Consent Order states that MSD's obligation to perform the operation and maintenance work listed in Paragraph 1 items a through k "shall be subject to a present value monetary cap of $250,000." MSD has identified all known costs associated with the maintenance, operations and other costs related to the Lees Lane Landfill site. These expenditures are

detailed in the attached exhibit. As of December 31, 2012, MSD has spent a total of $1,416,058. In 1991 dollars, this cost is equivalent to $1,004,765. Of this total, $426,496 was expended for items subject to the monetary cap, this cost is equivalent to $284,608 in 1991 dollars, and exceeds the monetary cap stated in the Order.

The order further states that "MSD shall demonstrate that the full amount of the monetary cap has been expended by supplying EPA with … documentation evidencing that such charges, costs, and payments were expended in performance of one or more of items a through k, along with calculations discounting such expenditures to 1991 dollars." MSD has included this documentation in subsequent attachments. Included with this submission are summary documents showing the actual costs incurred by MSD, the discounted expenditures, and the multipliers used to develop the discounted expenditures; line item detail of each expenditure claimed by MSD; and documentation of each expenditure including invoices, purchase orders, outputs from MSD's accounting system, and work orders and/or labor estimates for work performed internally.

If the monetary cap is demonstrated to be met prior to the termination date of the Order, MSD is still obligated "to continue to perform all other monitoring activities and operation and maintenance work set forth in Attachment I, with the exception of items a through k" until July 2020. MSD believes that the monetary cap for specified repair categories has been met. Although the operations and maintenance costs of the facility have far exceeded US EPA's original $500,000 estimate, MSD recognizes its continued obligation to monitor, operate and maintain the site as specified in the operations and maintenance manual through July 2020. We respectfully submit this documentation for your review and consideration.

Sincerely,

Greg C. Heitzman
Executive Director

GCH/hnd

Enclosed: 2
cc: Donna Seadler, US EPA Region 4
Tim Hubbard, KDWM
Sheri Adkins, KDWM
Daniel Phelps, KDWM
Virginia Baker, KDWM

Summary of MSD Expenditures
Lees Lane Landfill

January 1992 through December 2012

July 8, 2013

Actual Expenditures
All Categories

Year	Month												Grand Total
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
1992	$ 21,129.26	$ -	$ -	$ -	$ -	$ 296.96	$ -	$ -	$ -	$ -	$ -	$ -	**$ 21,426.22**
1993	$ 20,999.55	$ -	$ -	$ -	$ -	$ 900.48	$ -	$ -	$ 274.40	$ -	$ -	$ -	**$ 22,174.43**
1994	$ 19,363.95	$ -	$ 2,131.20	$ -	$ -	$ 3,172.28	$ -	$ -	$ 2,256.64	$ -	$ -	$ 846.24	**$ 27,770.31**
1995	$ 20,278.39	$ -	$ 2,529.60	$ -	$ -	$ 1,479.08	$ -	$ -	$ -	$ -	$ -	$ -	**$ 24,287.07**
1996	$ 21,933.55	$ -	$ -	$ -	$ -	$ 3,174.60	$ -	$ -	$ 2,398.72	$ -	$ -	$ -	**$ 27,506.87**
1997	$ 22,034.02	$ -	$ -	$ -	$ -	$ 4,740.00	$ -	$ -	$ -	$ -	$ -	$ 2,484.48	**$ 29,258.50**
1998	$ 20,655.00	$ -	$ -	$ -	$ -	$ 1,242.24	$ -	$ 870.00	$ 2,792.92	$ -	$ -	$ -	**$ 25,560.16**
1999	$ 25,524.85	$ -	$ 160.00	$ -	$ 12,500.00	$ 5,095.68	$ -	$ -	$ 1,800.00	$ 6,250.80	$ -	$ 12,500.00	**$ 63,831.33**
2000	$ 25,979.25	$ -	$ -	$ -	$ -	$ 12,500.00	$ -	$ -	$ 367.20	$ 7,154.00	$ -	$ 12,500.00	**$ 58,500.45**
2001	$ 28,188.68	$ -	$ -	$ -	$ -	$ 16,163.68	$ -	$ -	$ 10,186.44	$ -	$ -	$ -	**$ 54,538.80**
2002	$ 27,583.22	$ -	$ -	$ -	$ 12,500.00	$ -	$ -	$ -	$ -	$ 7,154.00	$ -	$ 347.84	**$ 47,585.06**
2003	$ 34,605.28	$ -	$ 13,668.50	$ -	$ 12,500.00	$ -	$ -	$ -	$ 8,512.00	$ -	$ 12,500.00	$ -	**$ 81,785.78**
2004	$ 36,779.76	$ 4,815.00	$ 2,660.00	$ 1,995.00	$ 19,564.54	$ -	$ 44,486.71	$ 3,000.00	$ 10,319.09	$ 7,077.00	$ 23,119.00	$ 1,380.71	**$ 155,196.81**
2005	$ 31,619.08	$ 11,857.05	$ 5,808.39	$ 3,756.87	$ 10,500.00	$ 3,542.25	$ 16,739.22	$ 3,750.00	$ 8,077.00	$ -	$ 12,500.00	$ -	**$ 108,149.86**
2006	$ 12,693.83	$ 11,250.00	$ 1,000.00	$ 4,800.00	$ -	$ 15,820.80	$ 1,600.00	$ -	$ 7,077.00	$ 14,100.00	$ -	$ -	**$ 68,341.63**
2007	$ 2,534.50	$ 3,200.00	$ -	$ -	$ -	$ 19,271.16	$ 11,998.34	$ 2,595.00	$ 5,160.80	$ 1,224.00	$ 8,094.47	$ 15,765.40	**$ 69,843.67**
2008	$ 5,944.58	$ -	$ 10,188.16	$ 12,402.76	$ 4,050.61	$ 14,935.91	$ 3,552.43	$ 221.14	$ 2,763.18	$ 3,628.00	$ 1,604.30	$ 17,250.00	**$ 76,541.06**
2009	$ -	$ 1,363.04	$ -	$ 266.61	$ 8,273.62	$ 19,601.10	$ 492.80	$ 3,447.50	$ 2,292.80	$ 3,713.61	$ 15,934.48	$ 11,440.00	**$ 66,825.56**
2010	$ -	$ -	$ -	$ 266.61	$ 7,419.10	$ 17,991.60	$ 18,112.41	$ 4,818.70	$ 3,953.75	$ 8,097.10	$ 76,936.00	$ 3,941.02	**$ 141,536.29**
2011	$ -	$ 18,912.10	$ 8,458.51	$ 13,860.00	$ 5,139.82	$ 32,430.98	$ 10,155.38	$ 11,874.54	$ 2,656.09	$ 5,205.57	$ 19,734.48	$ 644.43	**$ 129,071.90**
2012	$ 166.11	$ 4,263.79	$ 4,342.63	$ 7,558.17	$ 11,162.50	$ 22,710.19	$ 1,859.84	$ 5,729.45	$ 5,231.14	$ 9,337.02	$ 32,507.42	$ 11,457.74	**$ 116,325.98**
Grand Total	**$ 378,012.86**	**$ 55,660.98**	**$ 50,946.99**	**$ 44,906.02**	**$ 103,610.19**	**$ 195,068.98**	**$ 108,997.12**	**$ 36,306.32**	**$ 76,119.16**	**$ 72,941.10**	**$ 202,930.15**	**$ 90,557.86**	**$ 1,416,057.74**

Actual Expenditures
Operations & Maintenance

Year	Month												Grand Total
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
1992	$ 19,060.78												**$ 19,060.78**
1993	$ 20,999.55												**$ 20,999.55**
1994	$ 19,363.95					$ 205.80						$ 846.24	**$ 20,415.99**
1995	$ 20,278.39		$ 2,195.20			$ 845.00							**$ 23,318.59**
1996	$ 21,933.55					$ 845.00							**$ 22,778.55**
1997	$ 22,034.02												**$ 22,034.02**
1998	$ 20,655.00					$ 931.68		$ 870.00					**$ 22,456.68**
1999	$ 25,524.85				$ 12,500.00	$ 2,484.48			$ 1,800.00	$ 6,250.80		$ 12,500.00	**$ 61,060.13**
2000	$ 25,979.25					$ 12,500.00			$ 367.20	$ 7,154.00		$ 12,500.00	**$ 58,500.45**
2001	$ 27,548.68					$ 12,500.00			$ 7,154.00				**$ 47,202.68**
2002	$ 26,943.22				$ 12,500.00					$ 7,154.00			**$ 46,597.22**
2003	$ 31,100.64		$ 13,668.50		$ 12,500.00				$ 8,512.00		$ 12,500.00		**$ 78,281.14**
2004	$ 30,368.08				$ 12,500.00		$ 3,000.00	$ 3,000.00	$ 207.00	$ 7,077.00	$ 18,500.00		**$ 74,652.08**
2005	$ 23,067.87				$ 10,500.00	$ 800.26	$ 15,500.00	$ 3,750.00	$ 7,077.00		$ 12,500.00		**$ 73,195.13**
2006	$ 12,693.83	$ 11,250.00		$ 4,800.00		$ 12,500.00	$ 1,600.00		$ 7,077.00	$ 14,100.00			**$ 64,020.83**
2007	$ 1,984.50	$ 3,200.00				$ 17,247.16	$ 2,541.44				$ 5,081.07	$ 15,765.40	**$ 45,819.57**
2008	$ 92.58		$ 5,180.78	$ 1,617.19	$ 4,050.61	$ 14,935.91	$ 3,552.43	$ 221.14	$ 2,763.18	$ 3,628.00	$ 1,604.30	$ 17,250.00	**$ 54,896.11**
2009				$ 266.61	$ 6,115.37	$ 19,601.10	$ 492.80	$ 3,447.50	$ 2,292.80	$ 3,713.61	$ 15,934.48	$ 2,700.00	**$ 54,564.27**
2010				$ 266.61	$ 4,519.10	$ 16,447.50	$ 5,106.60	$ 3,201.10		$ 7,697.10			**$ 37,238.01**
2011		$ 18,507.70	$ 2,830.80			$ 24,348.27	$ 6,331.51	$ 3,201.10	$ 830.55	$ 4,762.61	$ 19,734.48		**$ 80,547.02**
2012	$ 166.11	$ 609.07	$ 664.44	$ 6,561.07		$ 17,361.07	$ 1,859.84	$ 3,859.45	$ 2,382.94	$ 1,492.00	$ 21,563.22	$ 5,403.78	**$ 61,922.97**
Grand Total	**$ 349,794.85**	**$ 33,566.77**	**$ 24,539.72**	**$ 13,511.48**	**$ 75,185.08**	**$ 153,553.22**	**$ 39,984.61**	**$ 21,550.28**	**$ 40,463.66**	**$ 63,029.12**	**$ 107,417.55**	**$ 66,965.42**	**$ 989,561.77**

Actual Expenditures Subject to Monetary Cap

Year	Month												Grand Total
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
1992	$ 2,068.48					$ 296.96							**$ 2,365.44**
1993						$ 900.48			$ 274.40				**$ 1,174.88**
1994			$ 2,131.20			$ 2,966.48			$ 2,256.64				**$ 7,354.32**
1995			$ 334.40			$ 634.08							**$ 968.48**
1996						$ 2,329.60			$ 2,398.72				**$ 4,728.32**
1997						$ 4,740.00						$ 2,484.48	**$ 7,224.48**
1998						$ 310.56			$ 2,792.92				**$ 3,103.48**
1999			$ 160.00			$ 2,611.20							**$ 2,771.20**
2000													**$ -**
2001	$ 640.00					$ 3,663.68			$ 3,032.44				**$ 7,336.12**
2002	$ 640.00											$ 347.84	**$ 987.84**
2003	$ 3,504.64												**$ 3,504.64**
2004	$ 6,411.68	$ 4,815.00	$ 2,660.00	$ 1,995.00	$ 7,064.54		$ 41,486.71		$ 10,112.09		$ 4,619.00	$ 1,380.71	**$ 80,544.73**
2005	$ 8,551.21	$ 11,857.05	$ 5,808.39	$ 3,756.87		$ 2,741.99	$ 1,239.22		$ 1,000.00				**$ 34,954.73**
2006			$ 1,000.00			$ 3,320.80							**$ 4,320.80**
2007	$ 550.00					$ 2,024.00	$ 9,456.90	$ 2,595.00	$ 5,160.80	$ 1,224.00	$ 3,013.40		**$ 24,024.10**
2008	$ 5,852.00		$ 5,007.38	$ 10,785.57									**$ 21,644.95**
2009		$ 1,363.04			$ 2,158.25							$ 8,740.00	**$ 12,261.29**
2010					$ 2,900.00	$ 1,544.10	$ 13,005.81	$ 1,617.60	$ 3,953.75	$ 400.00	$ 76,936.00	$ 3,941.02	**$ 104,298.28**
2011		$ 404.40	$ 5,627.71	$ 13,860.00	$ 5,139.82	$ 8,082.71	$ 3,823.87	$ 8,673.44	$ 1,825.54	$ 442.96		$ 644.43	**$ 48,524.88**
2012		$ 3,654.72	$ 3,678.19	$ 997.10	$ 11,162.50	$ 5,349.12		$ 1,870.00	$ 2,848.20	$ 7,845.02	$ 10,944.20	$ 6,053.96	**$ 54,403.01**
Grand Total	**$ 28,218.01**	**$ 22,094.21**	**$ 26,407.27**	**$ 31,394.54**	**$ 28,425.11**	**$ 41,515.76**	**$ 69,012.51**	**$ 14,756.04**	**$ 35,655.50**	**$ 9,911.98**	**$ 95,512.60**	**$ 23,592.44**	**$ 426,495.97**

Consumer Price Index

All Urban Consumers – CPI-U
US City Average – All Items
Source: bls.gov

Year	Month											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1992	138.10	138.60	139.30	139.50	139.70	140.20	140.50	140.90	141.30	141.80	142.00	141.90
1993	142.60	143.10	143.60	144.00	144.20	144.40	144.40	144.80	145.10	145.70	145.80	145.80
1994	146.20	146.70	147.20	147.40	147.50	148.00	148.40	149.00	149.40	149.50	149.70	149.70
1995	150.30	150.90	151.40	151.90	152.20	152.50	152.50	152.90	153.20	153.70	153.60	153.50
1996	154.40	154.90	155.70	156.30	156.60	156.70	157.00	157.30	157.80	158.30	158.60	158.60
1997	159.10	159.60	160.00	160.20	160.10	160.30	160.50	160.80	161.20	161.60	161.50	161.30
1998	161.60	161.90	162.20	162.50	162.80	163.00	163.20	163.40	163.60	164.00	164.00	163.90
1999	164.30	164.50	165.00	166.20	166.20	166.20	166.70	167.10	167.90	168.20	168.30	168.30
2000	168.80	169.80	171.20	171.30	171.50	172.40	172.80	172.80	173.70	174.00	174.10	174.00
2001	175.10	175.80	176.20	176.90	177.70	178.00	177.50	177.50	178.30	177.70	177.40	176.70
2002	177.10	177.80	178.80	179.80	179.80	179.90	180.10	180.70	181.00	181.30	181.30	180.90
2003	181.70	183.10	184.20	183.90	183.50	183.70	183.90	184.60	185.20	185.00	184.50	184.30
2004	185.20	186.20	187.40	188.00	189.10	189.70	189.40	189.50	189.90	190.90	191.00	190.30
2005	190.70	191.80	193.30	194.60	194.40	194.50	195.40	196.40	198.80	199.20	197.60	196.80
2006	198.30	198.70	199.80	201.50	202.50	202.90	203.50	203.90	202.90	201.80	201.50	201.80
2007	202.40	203.50	205.40	206.70	207.90	208.40	208.30	207.90	208.50	208.90	210.20	210.00
2008	211.10	211.70	213.50	214.80	216.60	218.80	219.964	219.086	218.783	216.573	212.425	210.228
2009	211.143	212.193	212.709	213.240	213.856	215.693	215.351	215.834	215.969	216.177	216.330	215.949
2010	216.687	216.741	217.631	218.009	218.178	217.965	218.011	218.312	218.439	218.711	218.803	219.179
2011	220.223	221.309	223.467	224.906	225.964	225.722	225.922	226.545	226.889	226.421	226.230	225.672
2012	226.655	227.663	229.392	230.085	229.815	229.478	229.104	230.379	231.407	231.317	230.221	229.601

CPI Factor Development

- Base Year: 1991
- Average 1991 CPI: 136.2
- CPI Factor = Base CPI ÷ CPI
- Example: January 1992
  - CPI: 138.10
  - CPI Factor: 136.2 ÷ 138.10 = 0.99
- Actual Expenditure × CPI Factor = Discounted Expenditure

CPI Factors

Year	Month											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1992	0.99	0.98	0.98	0.98	0.97	0.97	0.97	0.97	0.96	0.96	0.96	0.96
1993	0.96	0.95	0.95	0.95	0.94	0.94	0.94	0.94	0.94	0.93	0.93	0.93
1994	0.93	0.93	0.93	0.92	0.92	0.92	0.92	0.91	0.91	0.91	0.91	0.91
1995	0.91	0.90	0.90	0.90	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89
1996	0.88	0.88	0.87	0.87	0.87	0.87	0.87	0.87	0.86	0.86	0.86	0.86
1997	0.86	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.84	0.84	0.84	0.84
1998	0.84	0.84	0.84	0.84	0.84	0.84	0.83	0.83	0.83	0.83	0.83	0.83
1999	0.83	0.83	0.83	0.82	0.82	0.82	0.82	0.82	0.81	0.81	0.81	0.81
2000	0.81	0.80	0.80	0.80	0.79	0.79	0.79	0.79	0.78	0.78	0.78	0.78
2001	0.78	0.77	0.77	0.77	0.77	0.77	0.77	0.77	0.76	0.77	0.77	0.77
2002	0.77	0.77	0.76	0.76	0.76	0.76	0.76	0.75	0.75	0.75	0.75	0.75
2003	0.75	0.74	0.74	0.74	0.74	0.74	0.74	0.74	0.74	0.74	0.74	0.74
2004	0.74	0.73	0.73	0.72	0.72	0.72	0.72	0.72	0.72	0.71	0.71	0.72
2005	0.71	0.71	0.70	0.70	0.70	0.70	0.70	0.69	0.69	0.68	0.69	0.69
2006	0.69	0.69	0.68	0.68	0.67	0.67	0.67	0.67	0.67	0.67	0.68	0.67
2007	0.67	0.67	0.66	0.66	0.66	0.65	0.65	0.66	0.65	0.65	0.65	0.65
2008	0.65	0.64	0.64	0.63	0.63	0.62	0.62	0.62	0.62	0.63	0.64	0.65
2009	0.65	0.64	0.64	0.64	0.64	0.63	0.63	0.63	0.63	0.63	0.63	0.63
2010	0.63	0.63	0.63	0.62	0.62	0.62	0.62	0.62	0.62	0.62	0.62	0.62
2011	0.62	0.62	0.61	0.61	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60
2012	0.60	0.60	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59

Discounted Expenditures
All Categories

Year	Month												Grand Total
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
1992	$ 20,838.56	$ -	$ -	$ -	$ -	$ 288.49	$ -	$ -	$ -	$ -	$ -	$ -	**$ 21,127.05**
1993	$ 20,057.07	$ -	$ -	$ -	$ -	$ 849.34	$ -	$ -	$ 257.57	$ -	$ -	$ -	**$ 21,163.99**
1994	$ 18,039.47	$ -	$ 1,971.94	$ -	$ -	$ 2,919.35	$ -	$ -	$ 2,057.26	$ -	$ -	$ 769.93	**$ 25,757.94**
1995	$ 18,376.03	$ -	$ 2,275.64	$ -	$ -	$ 1,320.99	$ -	$ -	$ -	$ -	$ -	$ -	**$ 21,972.65**
1996	$ 19,348.12	$ -	$ -	$ -	$ -	$ 2,759.29	$ -	$ -	$ 2,070.38	$ -	$ -	$ -	**$ 24,177.79**
1997	$ 18,862.56	$ -	$ -	$ -	$ -	$ 4,027.37	$ -	$ -	$ -	$ -	$ -	$ 2,097.87	**$ 24,987.80**
1998	$ 17,408.48	$ -	$ -	$ -	$ -	$ 1,037.99	$ -	$ 725.18	$ 2,325.16	$ -	$ -	$ -	**$ 21,496.81**
1999	$ 21,159.37	$ -	$ 132.07	$ -	$ 10,243.68	$ 4,175.88	$ -	$ -	$ 1,460.15	$ 5,061.59	$ -	$ 10,115.86	**$ 52,348.61**
2000	$ 20,961.93	$ -	$ -	$ -	$ -	$ 9,875.29	$ -	$ -	$ 287.93	$ 5,599.86	$ -	$ 9,784.48	**$ 46,509.48**
2001	$ 21,926.32	$ -	$ -	$ -	$ -	$ 12,367.94	$ -	$ -	$ 7,781.23	$ -	$ -	$ -	**$ 42,075.49**
2002	$ 21,213.07	$ -	$ -	$ -	$ 9,468.85	$ -	$ -	$ -	$ -	$ 5,374.38	$ -	$ 261.89	**$ 36,318.19**
2003	$ 25,939.68	$ -	$ 10,106.68	$ -	$ 9,277.93	$ -	$ -	$ -	$ 6,259.90	$ -	$ 9,227.64	$ -	**$ 60,811.83**
2004	$ 27,048.61	$ 3,522.04	$ 1,933.26	$ 1,445.31	$ 14,091.43	$ -	$ 31,990.97	$ 2,156.20	$ 7,401.05	$ 5,049.17	$ 16,485.90	$ 988.19	**$ 112,112.15**
2005	$ 22,582.69	$ 8,419.87	$ 4,092.62	$ 2,629.42	$ 7,356.48	$ 2,480.49	$ 11,667.77	$ 2,600.56	$ 5,533.64	$ -	$ 8,615.89	$ -	**$ 75,979.42**
2006	$ 8,718.61	$ 7,711.37	$ 681.68	$ 3,244.47	$ -	$ 10,619.98	$ 1,070.86	$ -	$ 4,750.55	$ 9,516.45	$ -	$ -	**$ 46,313.97**
2007	$ 1,705.53	$ 2,141.72	$ -	$ -	$ -	$ 12,594.68	$ 7,845.29	$ 1,700.04	$ 3,371.23	$ 798.03	$ 5,244.84	$ 10,224.99	**$ 45,626.36**
2008	$ 3,835.39	$ -	$ 6,499.43	$ 7,864.32	$ 2,547.06	$ 9,297.40	$ 2,199.63	$ 137.48	$ 1,720.17	$ 2,281.60	$ 1,028.62	$ 11,175.72	**$ 48,586.83**
2009	$ -	$ 874.89	$ -	$ 170.29	$ 5,269.28	$ 12,377.17	$ 311.67	$ 2,175.51	$ 1,445.95	$ 2,339.72	$ 10,032.25	$ 7,215.26	**$ 42,212.00**
2010	$ -	$ -	$ -	$ 166.57	$ 4,631.46	$ 11,242.43	$ 11,315.53	$ 3,006.28	$ 2,465.22	$ 5,042.38	$ 47,890.95	$ 2,448.99	**$ 88,209.80**
2011	$ -	$ 11,639.06	$ 5,155.34	$ 8,393.43	$ 3,098.03	$ 19,568.76	$ 6,122.30	$ 7,139.03	$ 1,594.43	$ 3,131.33	$ 11,880.99	$ 388.93	**$ 78,111.64**
2012	$ 99.82	$ 2,550.82	$ 2,578.41	$ 4,474.10	$ 6,615.46	$ 13,478.97	$ 1,105.65	$ 3,387.25	$ 3,078.91	$ 5,497.66	$ 19,231.57	$ 6,796.77	**$ 68,895.38**
Grand Total	**$ 308,121.30**	**$ 36,859.77**	**$ 35,427.06**	**$ 28,387.90**	**$ 72,599.67**	**$ 131,281.81**	**$ 73,629.68**	**$ 23,027.53**	**$ 53,860.73**	**$ 49,692.18**	**$ 129,638.66**	**$ 62,268.88**	**$ 1,004,795.18**

Discounted Expenditures
Operations and Maintenance

Year	Month												Grand Total
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
1992	$ 18,798.54	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ 18,798.54**
1993	$ 20,057.07	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ 20,057.07**
1994	$ 18,039.47	$ -	$ -	$ -	$ -	$ 189.39	$ -	$ -	$ -	$ -	$ -	$ 769.93	**$ 18,998.78**
1995	$ 18,376.03	$ -	$ 1,974.81	$ -	$ -	$ 754.68	$ -	$ -	$ -	$ -	$ -	$ -	**$ 21,105.52**
1996	$ 19,348.12	$ -	$ -	$ -	$ -	$ 734.45	$ -	$ -	$ -	$ -	$ -	$ -	**$ 20,082.57**
1997	$ 18,862.56	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ 18,862.56**
1998	$ 17,408.48	$ -	$ -	$ -	$ -	$ 778.50	$ -	$ 725.18	$ -	$ -	$ -	$ -	**$ 18,912.16**
1999	$ 21,159.37	$ -	$ -	$ -	$ 10,243.68	$ 2,036.02	$ -	$ -	$ 1,460.15	$ 5,061.59	$ -	$ 10,115.86	**$ 50,076.68**
2000	$ 20,961.93	$ -	$ -	$ -	$ -	$ 9,875.29	$ -	$ -	$ 287.93	$ 5,599.86	$ -	$ 9,784.48	**$ 46,509.48**
2001	$ 21,428.50	$ -	$ -	$ -	$ -	$ 9,564.61	$ -	$ -	$ 5,464.81	$ -	$ -	$ -	**$ 36,457.91**
2002	$ 20,720.87	$ -	$ -	$ -	$ 9,468.85	$ -	$ -	$ -	$ -	$ 5,374.38	$ -	$ -	**$ 35,564.11**
2003	$ 23,312.64	$ -	$ 10,106.68	$ -	$ 9,277.93	$ -	$ -	$ -	$ 6,259.90	$ -	$ 9,227.64	$ -	**$ 58,184.79**
2004	$ 22,333.33	$ -	$ -	$ -	$ 9,003.17	$ -	$ 2,157.34	$ 2,156.20	$ 148.46	$ 5,049.17	$ 13,192.15	$ -	**$ 54,039.83**
2005	$ 16,475.32	$ -	$ -	$ -	$ 7,356.48	$ 560.39	$ 10,803.99	$ 2,600.56	$ 4,848.53	$ -	$ 8,615.89	$ -	**$ 51,261.16**
2006	$ 8,718.61	$ 7,711.37	$ -	$ 3,244.47	$ -	$ 8,390.83	$ 1,070.86	$ -	$ 4,750.55	$ 9,516.45	$ -	$ -	**$ 43,403.15**
2007	$ 1,335.42	$ 2,141.72	$ -	$ -	$ -	$ 11,271.90	$ 1,661.76	$ -	$ -	$ -	$ 3,292.30	$ 10,224.99	**$ 29,928.08**
2008	$ 59.73	$ -	$ 3,305.02	$ 1,025.42	$ 2,547.06	$ 9,297.40	$ 2,199.63	$ 137.48	$ 1,720.17	$ 2,281.60	$ 1,028.62	$ 11,175.72	**$ 34,777.87**
2009	$ -	$ -	$ -	$ 170.29	$ 3,894.74	$ 12,377.17	$ 311.67	$ 2,175.51	$ 1,445.95	$ 2,339.72	$ 10,032.25	$ 1,702.90	**$ 34,450.21**
2010	$ -	$ -	$ -	$ 166.57	$ 2,821.10	$ 10,277.56	$ 3,190.29	$ 1,997.09	$ -	$ 4,793.29	$ -	$ -	**$ 23,245.90**
2011	$ -	$ 11,390.18	$ 1,725.33	$ -	$ -	$ 14,691.67	$ 3,817.03	$ 1,924.52	$ 498.57	$ 2,864.88	$ 11,880.99	$ -	**$ 48,793.17**
2012	$ 99.82	$ 364.38	$ 394.51	$ 3,883.86	$ -	$ 10,304.16	$ 1,105.65	$ 2,281.71	$ 1,402.53	$ 878.49	$ 12,756.92	$ 3,205.54	**$ 36,677.56**
Grand Total	**$ 287,495.81**	**$ 21,607.65**	**$ 17,506.35**	**$ 8,490.60**	**$ 54,613.02**	**$ 101,104.02**	**$ 26,318.24**	**$ 13,998.24**	**$ 28,287.56**	**$ 43,759.43**	**$ 70,026.76**	**$ 46,979.43**	**$ 720,187.10**

Discounted Expenditures Subject to Monetary Cap

Year	Month												Grand Total
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
1992	$ 2,040.02	$ -	$ -	$ -	$ -	$ 288.49	$ -	$ -	$ -	$ -	$ -	$ -	**$ 2,328.51**
1993	$ -	$ -	$ -	$ -	$ -	$ 849.34	$ -	$ -	$ 257.57	$ -	$ -	$ -	**$ 1,106.91**
1994	$ -	$ -	$ 1,971.94	$ -	$ -	$ 2,729.96	$ -	$ -	$ 2,057.26	$ -	$ -	$ -	**$ 6,759.16**
1995	$ -	$ -	$ 300.83	$ -	$ -	$ 566.31	$ -	$ -	$ -	$ -	$ -	$ -	**$ 867.13**
1996	$ -	$ -	$ -	$ -	$ -	$ 2,024.83	$ -	$ -	$ 2,070.38	$ -	$ -	$ -	**$ 4,095.21**
1997	$ -	$ -	$ -	$ -	$ -	$ 4,027.37	$ -	$ -	$ -	$ -	$ -	$ 2,097.87	**$ 6,125.24**
1998	$ -	$ -	$ -	$ -	$ -	$ 259.50	$ -	$ -	$ 2,325.16	$ -	$ -	$ -	**$ 2,584.66**
1999	$ -	$ -	$ 132.07	$ -	$ -	$ 2,139.86	$ -	$ -	$ -	$ -	$ -	$ -	**$ 2,271.94**
2000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**
2001	$ 497.82	$ -	$ -	$ -	$ -	$ 2,803.33	$ -	$ -	$ 2,316.42	$ -	$ -	$ -	**$ 5,617.57**
2002	$ 492.20	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 261.89	**$ 754.09**
2003	$ 2,627.03	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ 2,627.03**
2004	$ 4,715.29	$ 3,522.04	$ 1,933.26	$ 1,445.31	$ 5,088.26	$ -	$ 29,833.63	$ -	$ 7,252.59	$ -	$ 3,293.76	$ 988.19	**$ 58,072.32**
2005	$ 6,107.37	$ 8,419.87	$ 4,092.62	$ 2,629.42	$ -	$ 1,920.10	$ 863.78	$ -	$ 685.11	$ -	$ -	$ -	**$ 24,718.26**
2006	$ -	$ -	$ 681.68	$ -	$ -	$ 2,229.14	$ -	$ -	$ -	$ -	$ -	$ -	**$ 2,910.82**
2007	$ 370.11	$ -	$ -	$ -	$ -	$ 1,322.79	$ 6,183.53	$ 1,700.04	$ 3,371.23	$ 798.03	$ 1,952.55	$ -	**$ 15,698.28**
2008	$ 3,775.66	$ -	$ 3,194.40	$ 6,838.89	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ 13,808.96**
2009	$ -	$ 874.89	$ -	$ -	$ 1,374.54	$ -	$ -	$ -	$ -	$ -	$ -	$ 5,512.36	**$ 7,761.79**
2010	$ -	$ -	$ -	$ -	$ 1,810.36	$ 964.86	$ 8,125.24	$ 1,009.18	$ 2,465.22	$ 249.10	$ 47,890.95	$ 2,448.99	**$ 64,963.90**
2011	$ -	$ 248.88	$ 3,430.01	$ 8,393.43	$ 3,098.03	$ 4,877.08	$ 2,305.27	$ 5,214.52	$ 1,095.86	$ 266.46	$ -	$ 388.93	**$ 29,318.47**
2012	$ -	$ 2,186.45	$ 2,183.90	$ 590.24	$ 6,615.46	$ 3,174.81	$ -	$ 1,105.54	$ 1,676.37	$ 4,619.17	$ 6,474.65	$ 3,591.23	**$ 32,217.82**
Grand Total	**$ 20,625.49**	**$ 15,252.12**	**$ 17,920.71**	**$ 19,897.30**	**$ 17,986.65**	**$ 30,177.79**	**$ 47,311.45**	**$ 9,029.29**	**$ 25,573.17**	**$ 5,932.75**	**$ 59,611.90**	**$ 15,289.46**	**$ 284,608.07**