MEMORANDUM

SUBJECT: Economic Analyses Completed for EPA by Abt for a Subset of Montana's Private Dischargers

FROM: Martin Hestmark, Assistant Regional Administrator
Ecosystems Protection and Remediation Program

TO: The File

DATE: February 26, 2015

The following list of Excel files and draft report were prepared by the EPA's contractor, Abt, in 2011:

- Substantial Impacts_ Mines Management (Montanore Mine)
- Substantial Impacts_ American Crystal Sugar Company
- Substantial Impacts_ Conoco Phillips Company
- Substantial Impacts_ Exxon Mobil Company
- Substantial Impacts_ Holcim
- Substantial Impacts_ Renewable Energy Corporation ASA
- IndustrialFacilites_reviewed
- Montana Discharger Financial Information
- Substantial and Widespread Impacts—Food Manufacturer
- Private Facilities Substantial and Widespread Impacts – Template 10.31.11
- Analysis of Potential Compliance Costs Associated with Proposed Nutrient Criteria for Montana Waters: Industrial Dischargers

The data presented in these documents summarize parent company financial data and apply EPA's 1995 economic guidance to evaluate possible substantial and widespread economic and social impacts to several private sector dischargers. These documents were developed in 2011 as the state initiated its work on the private sector economic analysis.

This information was considered by the EPA in its review of Montana's economic analysis. However, this information was not included in the state's final analysis. Our review focused on the economic data and information presented in Montana's final economic demonstration for private sector dischargers.

Our review and the basis for our approval of the state's final economic analysis is documented in the EPA's action letter dated February 26, 2015.