

US EPA ARCHIVE DOCUMENT

Quarterly Project Progress Report

Construction Storm Water Excellence Initiative 2007

EPA Grant# EI-96489108-0

JUNE 2011

**U.S. EPA State Innovation Grant Program
National Center for Environmental Innovation**

**Tennessee Department of Environment and Conservation
University of Tennessee, Municipal Technical Advisory Service**



Municipal Technical Advisory Service

In cooperation with the Tennessee Municipal League

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Project Description

Construction Stormwater Excellence Initiative

(Tennessee's State Innovation Grant Project- 2007)

Grantor:

US EPA State Innovation grant Program, National Center for Environmental Innovation

Grantee:

Tennessee Department of Environment and Conservation (TDEC)
University of Tennessee, Municipal Technical Advisory Service (MTAS)

State Project Manager:

Robert Karesh, Tennessee Department of Environment and Conservation
Division of Water Pollution Control, Statewide Stormwater Coordinator
401 Church Street, L & C Annex, 6th Floor
Nashville, TN 37243-1534
Phone: (615) 253-5402 / Fax (615) 532-0686
Email: Robert.Karesh@tn.gov

Total Project Cost:

The total amount funded was \$200,000. The State of Tennessee has committed a minimum of \$100,000 of in-kind funding for the same period. There are no other federal contributions to this program.

Project Period:

October 1, 2007 to September 30, 2011 (Extension Requested)

**Key Milestones (Including Outputs),
Reflecting The Projected Timelines For Completion¹**

Objectives and Outputs	Original Start Date (Amended Start Date)	Original Completion Date (Amended Completion Date)	Complete?	Slippage Explanation/Other Comments
Objective: Stormwater group preliminary organizational meeting (pre-award) Output(s): TDEC/MTAS meetings to determine key MS4's for preliminary solicitation, etc.	September 2007	May 2008	Yes	This objective combined with the 3rd objective while waiting for final signatures.
Objective: Execute contract with the University of Tennessee's Municipal Technical Advisory Service (MTAS) Output(s): Due to MTAS's unique status within the State, their ability to deliver training and technical support statewide to local governments and their history as a TDEC partner in the Stormwater program, MTAS will be the sole contractor for the initiative.	October 2007	Final Signatures May 2008	Yes	Final signatures were received by Contracts Division/TDEC May 2008
Objective: TDEC-MTAS project team meetings Output(s): Continuing identification of MS4's for Stormwater group. Identifying specific contacts from various other stake holder organizations. Scheduling venues for organizational meetings. Developing agenda's, informational literature, etc.	October 2007 (March 2008)	May 2008	Yes	As with Objective #1, TDEC-MTAS continued to work together on project and planning meetings during the delayed pre-award time. The final signatures were received by May 2008.
Objective: Establish stormwater group (Tennessee Stormwater Association) Output(s): Organize initial meeting of the state regional group representative at a state level. Formalize the group. Set up a calendar of regional & state meetings, etc.	December 2007 (March 2008)	June 2008	Yes	Due to delayed signatures for official contract award to MTAS, the development of the statewide Stormwater Association was not begun until March 2008
Objective: Establish stakeholder committee Output(s): Identify, contact, and obtain participation from representatives of the stakeholder groups. Set up and formalize the committee. Set mission, agenda, meeting calendar and milestones.	December 2007 (May 2008)	May 2008	Yes	Due to delayed signatures for official contract award to MTAS, and the delayed establishment of the TNSA, the Stakeholder Committee was not established until May 2008

¹ Please see Revised Timeline Schedule in Appendix B

**Key Milestones (Including Outputs),
Reflecting The Projected Timelines For Completion¹**

Objectives and Outputs	Original Start Date (Amended Start Date)	Original Completion Date (Amended Completion Date)	Complete?	Slippage Explanation/Other Comments
Objective: Issue new MS4 General Permit Output(s): <i>With the new minimum requirements for baseline MS4 programs, develop the additional minimum requirements for QLP. This was not part of Grant.</i>	Not part of grant	June 2008 (July 2010) (October 1, 2010)	Yes	TDEC worked with EPA to craft a permit that reflected the EPA's desire to see a "Green" permit with more emphasis on infiltration based permanent BMP's.
Objective: Facilitate meetings to establish criteria Output(s): <i>Set venue, agenda, etc., and facilitate meetings in order to achieve stakeholder input on the criteria for qualifying a local program.</i>	January 2008 (June 2008)	June 2010	Complete	Start date amended due to grant development delays but meetings have been held every quarter since the organizational Kickoff meeting held August 15, 2008. Prep work began in June 2008.
Objective: Develop and promote guidelines and incentives Output(s): <i>With the information from the stakeholder committee meetings, develop guidance material and an incentive program for qualifying local programs.</i>	Began in (September 2008)	June 2010	Complete	Start date amended due to grant development delays but meetings to develop incentives/criteria have been held every quarter since the organizational Kickoff meeting held August 15, 2008
Objective: Develop excellence recognition program Output(s): <i>With the information from additional stakeholder committee meetings, input from additional groups such as the Tennessee Municipal League, etc., develop excellence recognition program</i>	October 2009	September 2010 (February 2011)	Complete	Began initial discussion October 2009, and after amending the project timeline, we will have two more quarterly meetings to discuss & finalize Excellence Recognition. Permit issuance delays changed this to Feb 2011
Objective: MS4's implement new permit Output(s): <i>MS4's revise their programs in accordance with new permit</i>	July 2008 (July 2010)	January 2010 (January 2012)	In process	Issuance of permit delayed 2 years as explained.
Objective: Pilot the qualification of a MS4 Output(s): <i>Work with select MS4(s) volunteer(s) program(s) to work through guidance materials and document achieving the various elements involved in becoming a qualified program. Monitor the designated Qualified Program.</i>	June 2010 (June 2012)	June 2011 (June 2013)	No	To provide the MS4s with time to adhere to the new MS4 permit requirements, we requested a grant extension of two years. This projects the QLP Pilot start date for June 2012 and the QLP Program to go live in June 2013. Please see

Key Milestones (Including Outputs), Reflecting The Projected Timelines For Completion¹				
				Timeline in Appendix B.
Objectives and Outputs	Original Start Date (Amended Start Date)	Original Completion Date (Amended Completion Date)	Complete?	Slippage Explanation/Other Comments
Objective: Develop and deliver workshops across the state Output(s): <i>Based on the results of the pilot program, update the guidance materials. With the updated guidance materials and pilot program case history/histories, develop workshops lesson plans. Deliver workshops and guidance materials statewide.</i>	June 2011 (June 2013)	August 2011 (August 2013)	No	The timeline was adjusted by two additional years to provide the MS4s with enough time to adhere to the new MS4 permit requirements; we requested a grant extension of two years. This new timeline projects the QLP Pilot start date for June 2012 and the QLP Program to go live in June 2013. Please see Timeline in Appendix B.
Objective: Deliver a replicable solution to other states Output(s): <i>With updates to workshop lesson plans and materials based on participant feedback, develop final guidance materials, workshop lesson plans, case histories etc., for delivery to EPA.</i>	September 2011 (September 2013) *Note: the Gathering of supporting documentation in preparation for this item is ongoing.	September 2011 (September 2013)	No	The timeline was adjusted by two additional years to provide the MS4s with enough time to adhere to the new MS4 permit requirements; we requested a grant extension of two years. This new timeline projects the QLP Pilot start date for June 2012 and the QLP Program to go live in June 2013. Please see Timeline in Appendix B. Gathering of supporting documentation in preparation for this item is ongoing.

Part 1 – Synopsis of Accomplishments during the Reporting Period

The 13th reporting period (ending June 30, 2011, 2nd quarter (calendar year) 2011), was mainly part of the time needed under the requested extension for MS4's to work on familiarizing themselves with, and working on, their new Small MS4 Permit.

We followed up on the QLP Stakeholder Committee Meeting on February 17. Work was done by TDEC, MTAS, and the Committee on items necessary for the implementation of the QLP pilot.

TDEC has continued to support the establishment of the Tennessee Stormwater Association (TNSA) with efforts outside the scope and funding of this grant.

TNSA held regional meetings across the state which TDEC and MTAS attended in order to provide QLP and permit updates and provide education on the QLP process.

EPA is moving forward with a revised project timeline and project extension request, taking the issue of a new small MS4 permit and its impact on the project into account.²

² Appendix B

Part 2 – Narrative Discussion

2.1 QLP Stakeholder Committee

We followed up on items from the QLP Stakeholder Committee Meeting to February 17, 2011.

February 17, 2011 Agenda:

1. QLP Refresher
2. Proposed Construction General Permit
3. Final MS4 Permit
4. QLP Awards & Recognition
5. Becoming a QLP: Flowchart for QLP Application Preparation, Submittal and Approval
6. Results of the 1st QLP Survey per QAPP

Several resources had been developed or finalized in preparation for this meeting. Supporting documentation and additional contact and negotiation with other agencies were required on some of these:

- Procedure: the step by step application, probation, and approval process guidelines for an MS4 to become a Qualified Local program in the State of Tennessee
- TDEC approved standardized QLP application forms
- A final TDEC approved list of incentives for becoming a QLP:
 - Incentive #1: Standardized TDEC/ QLP Enforcement Protocol
 - Incentive #2: QLP status considered equivalent to program effectiveness monitoring
 - Incentive #3: MS4's applying for QLP Status will have to show that the necessary resources will be provided
 - Incentive #4: QLP Status requirements guaranteed static
 - Incentive #5: Streamlining QLP procedures
- A final TDEC approved list of potential awards or recognition measures for QLP's in Tennessee:
 - QLP Website
 - Special QLP Logo
 - Public Announcement/Press Release/Photo Opportunity with TDEC Commissioner
 - Additional Points awarded for State Revolving Fund (SRF) loans and Community Development Block Grants (CDBG)

- Articles in Magazines, Professional Newsletters and Websites

In particular, we concentrated on the following:

- Preparing for a QLP Advisory Committee meeting in the third quarter
- Finalizing the QLP Application and review and approval process
- Finalizing the supporting documentation and forms for the Minimum requirements
- Putting together a QLP public outreach campaign
- Finalizing the reporting and information sharing process and mechanisms between the QLP's and TDEC.

2.2 Revised Project Timeline and Formal Project Extension Request

As of this report, no extension has been approved; however we are basing our actions on the assurance that it will be issued. EPA is presently moving forward on the extension process.

The driving force justifying the need for the time extension was the delay in the issuance of Tennessee's new General Permit for Small MS4s. TDEC worked with EPA to craft a permit that reflected the EPA's desire to see a "Green" permit with more emphasis on infiltration based permanent BMP's. The MS4s will need time to revise their programs in accordance with the new permit. This unforeseen time adjustment would not leave enough time for a full Pilot Program prior to the original end date of the project.

2.3 Tennessee Stormwater Association

One of the key components to the education and outreach for input for the QLP option was the establishment of the Tennessee Stormwater Association. This was identified in the grant proposal. Support for this outreach and input is a grant activity. The Association has been invaluable in this process and will continue to be.

As provided for in this innovation grant, we have continued to support the TNSA during this reporting period.

TDEC has also continued to support the establishment of the TNSA with efforts outside the scope and funding of this grant.

Part 3 – Projection of Activities, Accomplishments, and Major Expenditures for Next Quarterly Report

During the next quarter we will be:

- Preparing for and holding a QLP Advisory Committee meeting
- Finalizing the QLP Application and review and approval process
- Continue Finalizing the supporting documentation and forms for the Minimum requirements
- Putting together a QLP public outreach campaign
- Finalizing the reporting and information sharing process and mechanisms between the QLP's and TDEC.

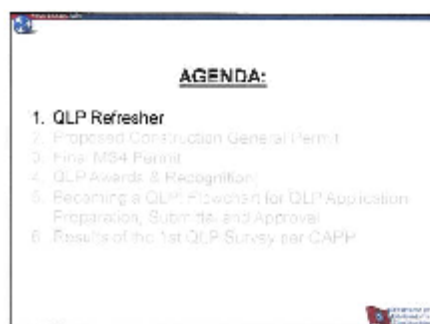
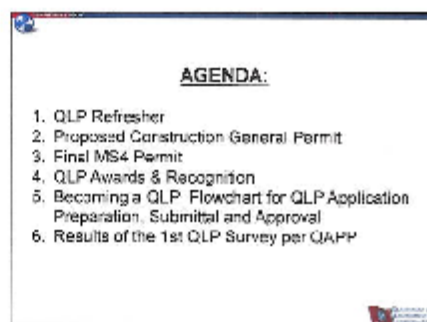
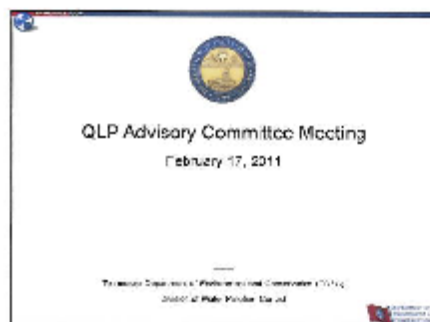
Part 4 – Financial Report

The project budget is on track for the goals and milestones of this project. Information Technology set up an internal account at MTAS under which project reporting continues to capture the Grant related hours. An invoice for January-March 2011 for \$9,833.77 was submitted to TDEC by MTAS on May 4, 2011, of this Quarter. A table based on that invoice is included below. TDEC, likewise, set up an internal tracking mechanism and continues to capture TDEC hours to apply toward the in-kind match. MTAS and TDEC began talks on revising the budget this quarter. Because budget amounts were projected, a budget amendment is necessary. This will not impact project results/delivery. MTAS and TDEC will be revising the budget for approval during the next period.

Budget Category	Total Approved EPA Project Budget	Current Invoice: Jan. 1-Mar.31, 2011	Cumulative to Date
Professional Salaries	\$80,000	\$4,851.45	\$90,237.10
Fringe Benefits/Insurance	\$24,000	\$2,644.21	\$30,705.38
Travel	\$10,000	\$619.62	\$8,926.03
Printing/Supplies	\$15,000	\$307.81	\$439.39
Training/Special Services	\$15,000	\$435.82	\$3,884.43
Fixed and Administrative Costs	\$56,000	\$1,282.67	\$20,128.85
Totals	\$200,000	\$9,833.77	

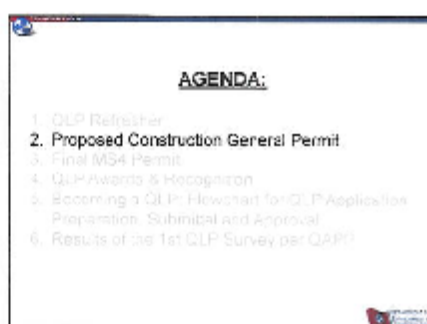
APPENDIX “A”

5/5/2011

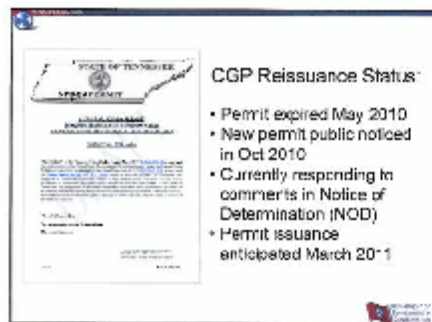


Tasks	Outputs	Completion Date
Establish Tennessee Stormwater Association	Set up a calendar of regional and state meetings, etc.	March 2008
Establish QLP stakeholder committee	Participation from representatives of the stakeholder groups	May 2008
Develop QLP Criteria and Incentives	Facilitate stakeholder input on the criteria for qualifying a local program	July 2010 (Update 2nd MS4 permit cycle 10/2010)

Tasks	Outputs	Completion Date
Pilot QLP Program	Work with volunteer MS4 programs and monitor.	June 2012
Finalize CLP Program	Modification based on experience with pilot period. Open enrollment	June 2013
Deliver replicable solution to other states	Develop final guidance materials for delivery to EPA.	August 2013

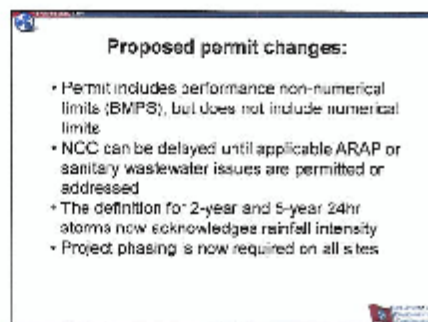


5/5/2011



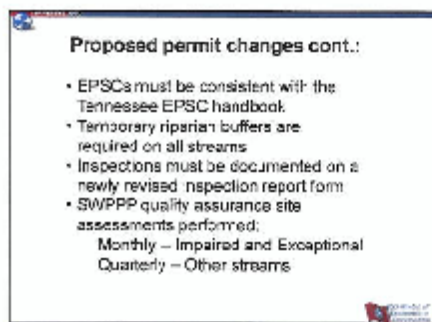
CGP Reissuance Status:

- Permit expired May 2010
- New permit public noticed in Oct 2010
- Currently responding to comments in Notice of Determination (NOD)
- Permit issuance anticipated March 2011



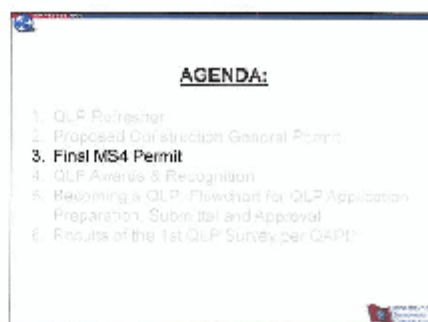
Proposed permit changes:

- Permit includes performance non-numerical limits (BMPs), but does not include numerical limits
- NCC can be delayed until applicable ARAP or sanitary wastewater issues are permitted or addressed
- The definition for 2-year and 5-year 24hr storms now acknowledge rainfall intensity
- Project phasing is now required on all sites



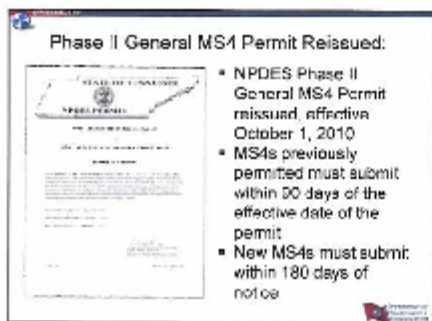
Proposed permit changes cont.:

- EPSCs must be consistent with the Tennessee EPSC handbook
- Temporary riparian buffers are required on all streams
- Inspections must be documented on a newly revised inspection report form
- SWPPP quality assurance site assessments performed:
 - Monthly – Impaired and Exceptional
 - Quarterly – Other streams



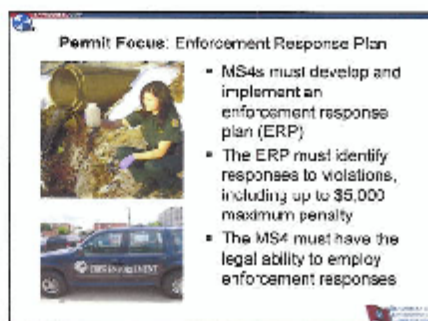
AGENDA:

1. QLP Refresher
2. Proposed Construction General Permit
3. Final MS4 Permit
4. QLP Awards & Recognition
5. Receiving a QLP - Flowchart for QLP Application Preparation, Submittal and Approval
6. Results of the 1st QLP Survey per GAPI



Phase II General MS4 Permit Reissued:

- NPDES Phase II General MS4 Permit reissued, effective October 1, 2010
- MS4s previously permitted must submit within 90 days of the effective date of the permit
- Now MS4s must submit within 180 days of notice




Permit Focus: Enforcement Response Plan

- MS4s must develop and implement an enforcement response plan (ERP)
- The ERP must identify responses to violations, including up to \$5,000 maximum penalty
- The MS4 must have the legal ability to employ enforcement responses


5/5/2011

Permit Focus: Construction Stormwater Control





- EPSCs required through ordinance or other regulatory mechanism
- Practices must be consistent with TDEC EPSC Handbook
- EPSC plans reviewed for completeness and effectiveness

Permit Focus: Construction Stormwater Control



- Requirements from current CGP for design storm and special conditions
- Require that operators control wastes such as building materials, concrete washout, chemicals and sanitary waste

Permit Focus: Construction Stormwater Control

- Perform site inspection and enforcement
- Develop and maintain an inventory of active public and private construction sites, containing relevant information for each site (tracking number, name, location, size, coverage date etc)

AGENDA:

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6. Results of the 1st QLP Survey per CGPP

Awards and Recognition

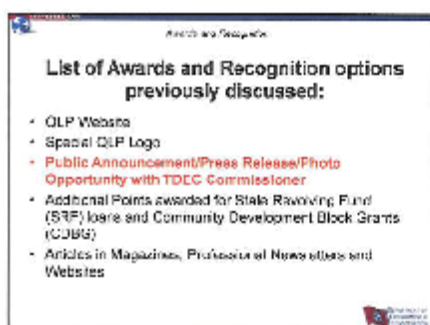
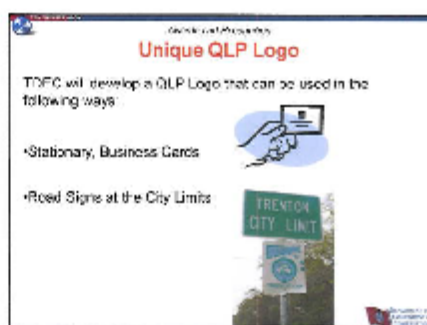
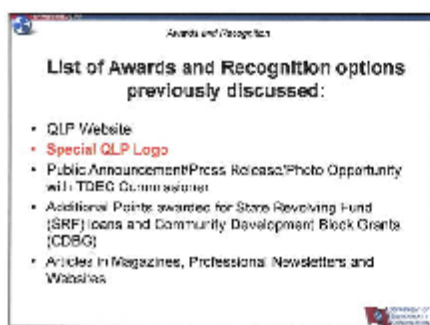
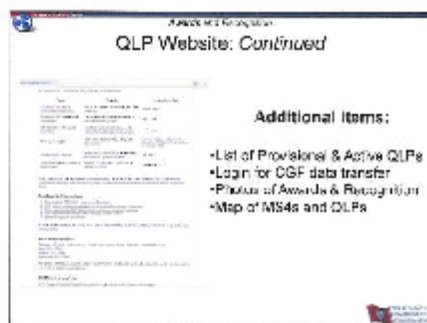
Awards & Recognition Options, Opportunities, & Incentives For Qualified Local Programs

Awards and Recognition

List of Awards and Recognition options previously discussed:

- QLP Website
- Special QLP Logo
- Public Announcement/Press Release/Photo Opportunity with TDEC Commissioner
- Additional Points awarded for State Revolving Fund (SRF) loans and Community Development Block Grants (CDBG)
- Articles in Magazines, Professional Newsletters and Websites

5/5/2011



5/5/2011

Awards and Recognition

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- Articles in Magazines, Professional Newsletters and Websites

Awards and Recognition

Additional Points awarded for State Revolving Fund (SRF) loans and Community Development Block Grants (CDBG)

Clean Water State Revolving Fund

- **State Revolving Fund**
 - SRF funding is available solely for stormwater related projects
 - Currently discussing the award of Priority points to QLPs applying for a stormwater, wastewater or drinking water SRF loan
- **Community Development Block Grants**
 - Currently Exploring possibilities in awarding Priority Points

Awards and Recognition

List of Awards and Recognition options previously discussed:

- QLP Website
- Special QLP Logo
- Public Announcement/Press Release/Photo Opportunity with TDEC Commissioner
- **Additional Points awarded for State Revolving Fund (SRF) loans and Community Development Block Grants (CDBG)**
- **Articles in Magazines, Professional Newsletters and Websites**

Awards and Recognition

Articles in Magazines, Professional Newsletters and Websites

- TDEC will coordinate with the publishing community to showcase QLPs and related program information in professional newsletters, professional magazines and websites

Home Builder **STORMWATER** **QLP**

AGENDA:

1. QLP Refresher
2. Proposer Construction General Permit
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6. Results of the 1st QLP Survey per QAPP

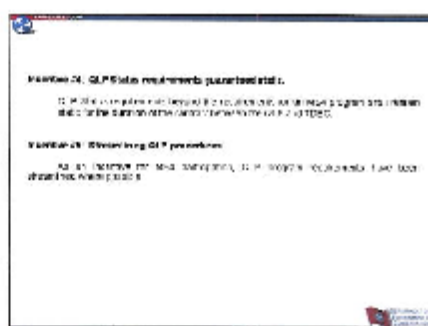
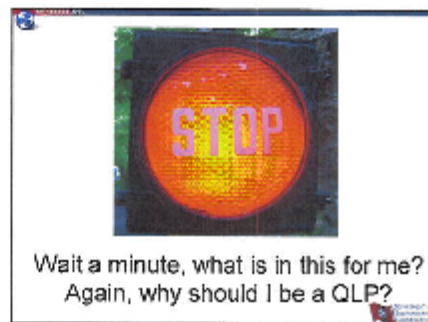
Revised Minimum Requirements for QLP Certification

MS4


MS4

MS4

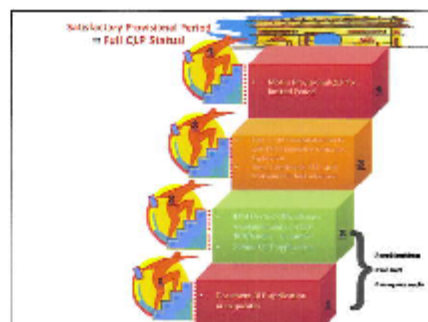

- Language modified to make consistent with new MS4 and proposed CGP permit
- Removal of requirement for compliance with turbidity effluent limitations and monitoring requirements



5/5/2011




O.K., I can see why I might be interested. What is that process?

- Stormwater Management Plan
- 2010 Permit Compliant Ordinances
- Administrative Penalty Process (SO 500)
- Substantial compliance with construction minimum measure of the MS4 permit
- Completed resource self-evaluation
- Stop and EPSC review procedures
- Enforcement Response Plan
- Project tracking procedures

Construction Activity Inventory and Reporting:

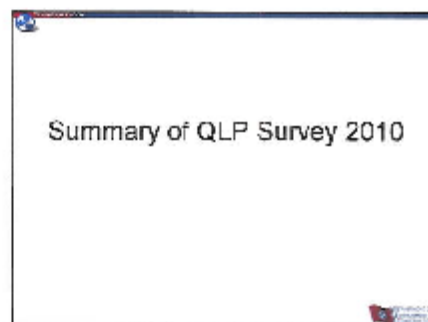
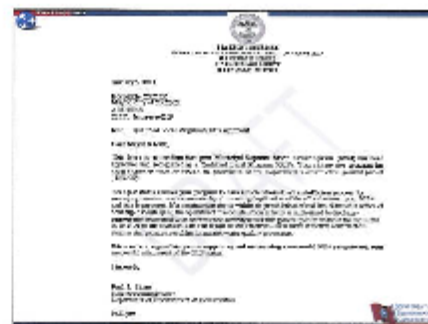
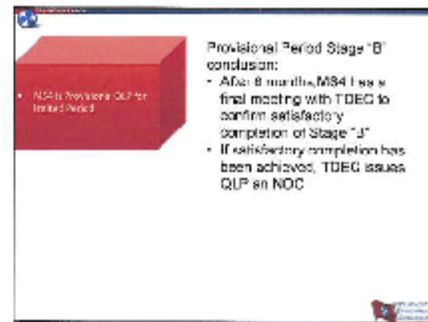


- Currently developing virtual private network (VPN) portal to report construction activities via Waterlog
- Researching ability to establish a node as alternative
- Each QLP will be saved a block of coverage numbers

Construction Activity Reporting Fields:

1. Submittal date	11. Total acres
2. Coverage date	12. T&E
3. Coverage No.	13. Exceptional or impaired waters
4. SWPPP provided	14. Wetland delineation
5. Site/project name	15. ARAP obtained
6. Owner/operator(s)	16. Related enforcement and compliance documents
7. Lat/long	
8. Start date	
9. End date	
10. Acres disturbed	



APPENDIX “B”

- B-1 Formal Time Extension Request Letter
- B-2 QLP Timeline Proposal and Comparison



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER POLLUTION CONTROL
401 Church Street
L&C Annex 6th Floor
Nashville, TN 37243-1534

March 9, 2010

Mr. Sean Flynn
USEPA Region 4
Planning and Environmental Accountability Branch
61 Forsyth Street, S.W.
Atlanta, GA 30303-8960

Re: ***Grant Extension Request***
Construction Stormwater Excellence Initiative 2007
EPA Grant # EI-96489108-0

Dear Mr. Flynn:

On February 10, 2010, we had a conference call meeting with you and Mr. Gerald Filbin to discuss the possibility of a two-year no additional cost time extension for our grant referenced above. This correspondence serves to document that meeting and to formally request an extension to our existing timeline.

We are requesting a two year extension for the purpose of providing time for MS4s participating in the grant's QLP Pilot Period to accomplish the following two actions:

- Revise their stormwater programs in accordance with new General Permit for small MS4s;
- Enable a full QLP pilot period.

Our General Permit for Small MS4s expired on February 26, 2008. Although we had originally projected the permit would be re-issued in June 2009, due to delays, it is now scheduled to be reissued in July 2010. The development of the permit has been mainly delayed due to the number and complexity of new or revised permit elements. The permit will go through a 60 day formal public comment period and the final issuance of the permit is anticipated in July 2010.

Due to the permit delay, MS4s will not have time to review the new permit and effectively update their programs prior to participating in the grant's Pilot Period, which is currently scheduled for June 2010. Keeping the grant under the current schedule would

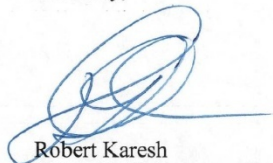
result in the MS4s using a portion of the Pilot Period for program update, rather than piloting the QLP program.

We feel it is important to the success of this grant to provide MS4s time to revise their stormwater programs in accordance with new permit requirements, as well as enable a full QLP pilot period. A two year extension would provide this needed additional time. Resultantly, the grant's QLP Pilot start date would be set for June 2012, and the QLP Program to go live in June 2013. This time extension includes no need for additional funds.

Please see the attached timeline document and adjusted grant milestones document. It is requested that our grant project period be extended from September 2011 to September 2013. We believe this extension will allow us to successfully meet the project tasks described in the attachments.

Thank you for your consideration of our grant extension request.

Sincerely,



Robert Karesh
Statewide Stormwater Coordinator
Department of Environment and Conservation
Division of Water Pollution Control

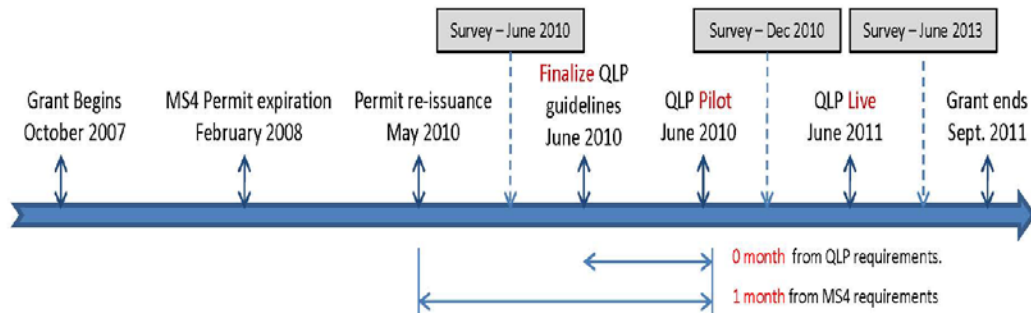
B-2

1) Timeline - At time of grant initiation

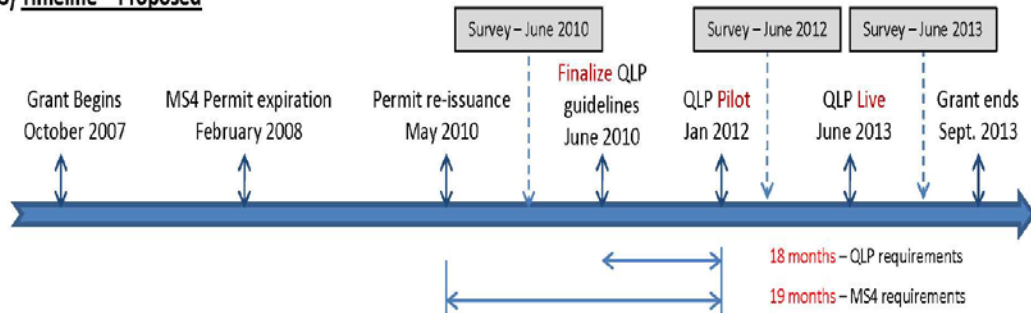
In order to provide the MS4s with enough time to adhere to the new MS4 permit requirements, we requested a grant extension of two years. This new timeline projects the QLP Pilot start date for June 2012 and the QLP Program to go live in June 2013.



2) Timeline - Current



3) Timeline - Proposed



APPENDIX “C”

C-1 MTAS Invoice

Tennessee Department of Environment and Conservation									
L & C Tower, 6th Floor, Attn. Sandra Kane									
401 Church Street									
Nashville, TN 37243									
Jan. 1, 2011 through March 31, 2011									
Detail for Invoice # 2278									
Invoice date: 5/4/11									
UTK Fed ID # 62-6001636									
						Amount	Current	Total	
						Billed To Date	Period	Amount	
						(Incl current period)	1/1/11-3/31/11	Due	
	Professional Salaries					\$90,237.10	\$4,851.45	\$4,851.45	
	Support Salaries					\$0.00	\$0.00	\$0.00	
	Benefits					\$26,191.38	\$1,394.21	\$1,394.21	
	Travel					\$8,926.03	\$619.62	\$619.62	
	Printing					\$330.06	\$0.00	\$0.00	
	Supplies					\$109.33	\$0.00	\$0.00	
	Insurance					\$4,514.00	\$1,250.00	\$1,250.00	
	Special Services					\$3,884.43	\$435.82	\$435.82	
	Program Support					\$20,128.85	\$1,282.67	\$1,282.67	
	Invoice Total:					\$154,321.18	\$9,833.77	\$9,833.77	
Prof. Salaries:	Salaried time spent on Muni. Storm Sewers Systems.					\$90,237.10	\$4,851.45	\$4,851.45	
Support Salaries:	Support time spent on Muni. Storm Sewers Systems.					\$0.00	\$0.00	\$0.00	
						\$90,237.10	\$4,851.45	\$4,851.45	
Benefits:	Benefits associated with above salaried time.					\$26,191.38	\$1,394.21	\$1,394.21	
						\$26,191.38	\$1,394.21	\$1,394.21	
Travel:	John Chlarson travel					\$8,926.03	\$619.62	\$619.62	
						\$8,926.03	\$619.62	\$619.62	
Printing:						\$330.06	\$0.00	\$0.00	
						\$330.06	\$0.00	\$0.00	
Supplies:						\$109.33	\$0.00	\$0.00	
						\$109.33	\$0.00	\$0.00	
Insurance:						\$4,514.00	\$1,250.00	\$1,250.00	
						\$4,514.00	\$1,250.00	\$1,250.00	
Special Services:						\$3,884.43	\$0.00	\$0.00	
	TDEC meeting in Nashville (Feb. 17)- breakfast 27 attendees					0.00	163.18	\$163.18	
	TDEC meeting in Nashville (Feb. 17)- lunch for 27 attendees					0.00	272.64	\$272.64	
						\$3,884.43	\$435.82	\$435.82	
Program Support:	Facilities & Admin. Costs (15% of direct costs)					\$20,128.85	\$1,282.67	\$1,282.67	
					TOTALS	\$154,321.18	\$9,833.77	\$9,833.77	