

281. The actual and threatened harm to Plaintiff's members would be redressed by an injunction or other relief that prevents or deters further violations of emission standards and limitations, or that remediates harm that has already been caused to local communities.

RELIEF REQUESTED

Plaintiffs request that this Court:

- a. Declare Defendants to have violated and to be in violation of the Clean Air Act, the Pennsylvania SIP, and the Plant's Title V operating permit on each of the dates and by committing each of the violations described in Counts I through VIII;
- b. Order Defendants to comply with the Clean Air Act, the Pennsylvania SIP, the Plant's Title V operating permit, and to refrain from further violations of the emission standards and limitations specified in the Plant's Title V operating permit, and the Pennsylvania SIP;
- c. Order Defendants to implement measures to remedy, mitigate, or offset the harm to public health and the environment caused by the violations alleged above;
- d. Assess an appropriate civil penalty against Defendants of up to \$37,500 per day for each violation of the Act and applicable permits and regulations, as provided by 42 U.S.C. §§ 7413(e) and 7604(a) and (g);
- e. Award Plaintiffs their costs of litigation (including reasonable attorney and expert witness fees), as provided by 42 U.S.C. § 7604(d);
- f. Order such other relief as the Court deems appropriate.

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