

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

OFFICE OF COMPLIANCE & INSPECTION

**IN RE: Branca Brothers, Inc.
 Daniel Branca Life Estate**

FILE NO.: OCI-HW-17-84

NOTICE OF VIOLATION

A. Introduction

Pursuant to Sections 42-17.1-2(21) and 42-17.6-3 of the Rhode Island General Laws, as amended, (“R.I. Gen. Laws”) you are hereby notified that the Director of the Department of Environmental Management (the “Director” of “DEM”) has reasonable grounds to believe that the above-named parties (“Respondents”) have violated certain statutes and/or administrative regulations under the DEM's jurisdiction.

B. Administrative History

On 24 October 2013, DEM issued a Letter of Non-Compliance to Branca Brothers, Inc. alleging several instances of noncompliance including the failure to label used oil containers, to label universal waste and to immediately respond to a spill or release of used oil. On 3 April 2018, DEM issued an Expedited Citation Notice (“ECN”) to Branca Brothers, Inc. for the violations that are the subject of this Notice of Violation (“NOV”). The ECN required specific actions to correct the violations and included payment of an administrative penalty. On 5 April 2018, the ECN was delivered. Branca Brothers, Inc. did not respond to or comply with the ECN. On or about 5 July 2018, the ECN expired.

C. Facts

- (1) The property is located at 50 Starr Street, Assessor’s Plat 5, Lot 221 in the Town of Johnston, Rhode Island (the “Property”). The Property includes a facility used as an automobile salvage yard for the resale of automotive parts and a solid waste container leasing operation (the “Facility”).
- (2) Daniel Branca Life Estate owns the Property.
- (3) Branca Brothers, Inc. operates the Facility.
- (4) On 12 September 2017, the DEM inspected the Facility. The inspection revealed the following:
 - (a) Failure to label a 5-gallon container and a 1-gallon container, both holding used oil, with the words “Used Oil” and failure to close the 5-gallon container;
 - (b) Used oil spilled onto the ground in 2 areas of the vehicle storage yard and no steps taken to contain and clean up the spill; and

- (c) Failure to label a universal waste battery with the words “Universal Waste Battery”.
- (5) As of the date of the NOV, the instances of noncompliance identified above have not been corrected.

D. Violation

Based on the foregoing facts, the Director has reasonable grounds to believe that you have violated the following statutes and/or regulations:

- (1) **R.I. Gen. Laws Section 46-12.5.1-3** – prohibiting any person from discharging, cause to be discharged, or permit the discharge of oil upon the land except by regulation or by permit from the DEM.
- (2) **DEM’s Oil Pollution Control Regulations (the “OPC Regulations”) Section 6(a) (recently amended to Part 2.6A)** – prohibiting any person from discharging, cause to be discharged, or permit the discharge of oil upon the land except by regulation or by permit from the DEM.
- (3) **DEM’s OPC Regulations Section 12(b)(2) (recently amended to Part 2.12B.2)** – requiring any person subject to the regulations to immediately stop the discharge and begin containment and removal of the oil and waste material.
- (4) **DEM’s Rules and Regulations for Hazardous Waste Management (the “Hazardous Waste Regulations”) 15.4A.3 (recently amended to Part 1.16.4.A.1.c)** – requiring that used oil generators label all containers holding used oil with the words “Used Oil”.
- (5) **DEM’s Hazardous Waste Regulations 15.4.A.5 (recently amended to Part 1.16.4.A.1.e)**– requiring used oil generators to keep containers holding used oil closed except when adding or removing waste.
- (6) **DEM’s Hazardous Waste Regulations 15.4D (recently amended to Part 1.16.4.A.4.a)** – requiring used oil generators to take immediate steps to contain and clean up spills or releases of used oil.
- (7) **DEM’s Hazardous Waste Regulations 13.5I (recently amended to Part 1.14.5.A.10)** – requiring universal waste handlers to label the waste with the words “Universal Waste Batteries”.

E. Order

Based upon the violations alleged above and pursuant to R.I. Gen. Laws Section 42-17.1-2(21), Respondents are hereby ORDERED to:

- (1) **IMMEDIATELY** clean up all used oil that was spilled on the ground and all soil that was impacted by the release and ship it to a properly licensed disposal facility in accordance with the requirements of Section 13 (recently amended to Part 2.13) of the DEM's OPC Regulations. **Within 10 days** of the shipment, submit a copy of a bill of lading or receipt to the DEM's Office of Compliance and Inspection ("OC&I") to document the proper disposal of this material.
- (2) **Upon completion of the work in Section E (1) above**, collect representative soil samples from the excavated area and have the samples analyzed to determine the concentration of total petroleum hydrocarbon which remains in the soil. **Within 10 days of receipt of the analytical test results**, submit a copy to the OC&I.

Based upon the violations alleged above and pursuant to R.I. Gen. Laws Section 42-17.1-2(21), Branca Brothers, Inc. is hereby ORDERED to:

- (3) **Within 30 days of receipt of the NOV**, complete the following:
 - (a) Label all containers holding used oil with the words "Used Oil";
 - (b) Close and keep closed all containers holding used oil except when it is necessary to add or remove used oil; and
 - (c) Label all universal waste batteries with the words "Universal Waste Batteries."

F. Penalty

- (1) Pursuant to R.I. Gen. Laws Section 42-17.6-2, the following administrative penalty, as more specifically described in the attached penalty summary and worksheets, is hereby ASSESSED, jointly and severally, against Branca Brothers, Inc.:

\$10,000

- (2) The proposed administrative penalty is calculated pursuant to the DEM's *Rules and Regulations for Assessment of Administrative Penalties*, as amended, and must be paid to the DEM within 30 days of your receipt of the NOV. Payment shall be in the form of a certified check, cashiers check or money order made payable to the "General Treasury - Environmental Response Fund," and shall be forwarded to the DEM Office of Compliance and Inspection, 235 Promenade Street, Suite 220, Providence, Rhode Island 02908-5767.

- (3) Penalties assessed against Respondent in the NOV are penalties payable to and for the benefit of the State of Rhode Island and are not compensation for actual pecuniary loss.
- (4) If any violation alleged herein shall continue, then each day during which the violation occurs or continues shall constitute a separate offense and the penalties and/or costs for that violation shall continue to accrue in the manner set forth in the attached penalty summary and worksheets. The accrual of additional penalties and costs shall be suspended if the Director determines that reasonable efforts have been made to comply promptly with the NOV.

G. Right to Administrative Hearing

- (1) Pursuant to R.I. Gen. Laws Chapters 42-17.1, 42-17.6, 42-17.7 and 42-35, each named respondent is entitled to request a hearing before the DEM's Administrative Adjudication Division regarding the allegations, orders and/or penalties set forth in Paragraphs B through F above. All requests for hearing MUST:
 - (a) Be in writing. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and 42-17.6-4(b);
 - (b) Be **RECEIVED** by the DEM's Administrative Adjudication Division, at the following address, within 20 days of your receipt of this NOV. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and 42-17.7-9:

Administrative Clerk
DEM - Administrative Adjudication Division
235 Promenade Street, Room 350
Providence, RI 02908-5767

- (c) Indicate whether you deny the alleged violations and/or whether you believe that the administrative penalty is excessive. See R.I. Gen. Laws Section 42-17.6-4(b); **AND**
- (d) State clearly and concisely the specific issues which are in dispute, the facts in support thereof and the relief sought or involved, if any. See Part 1.7B of the DEM's *Administrative Rules of Practice and Procedure for the Administrative Adjudication Division for Environmental Matters*.

- (2) A copy of each request for hearing must also be forwarded to:

Joseph J. LoBianco, Esquire
DEM - Office of Legal Services
235 Promenade Street, 4TH Floor
Providence, RI 02908-5767

- (3) Each named respondent has the right to be represented by legal counsel at all administrative proceedings relating to this matter.
- (4) Each respondent must file a separate and timely request for an administrative hearing before the DEM's Administrative Adjudication Division as to each violation alleged in the written NOV. If any respondent fails to request a hearing in the above-described time or manner regarding any violation set forth herein, then the NOV shall automatically become a Final Compliance Order enforceable in Superior Court as to that respondent and/or violation and any associated administrative penalty proposed in the NOV shall be final as to that respondent. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and (vi) and 42-17.6-4(b) and (c).
- (5) Failure to comply with the NOV may subject each respondent to additional civil and/or criminal penalties.
- (6) An original signed copy of the NOV is being forwarded to the Town of Johnston, Rhode Island wherein the Property is located to be recorded in the Office of Land Evidence Records pursuant to R.I. Gen. Laws Chapter 34-13 and Section 23-19.1-33, as amended.
- (7) The NOV does not preclude the Director from taking any additional enforcement action nor does it preclude any other local, state, or federal governmental entities from initiating enforcement actions based on the acts or omissions described herein.

If you have any legal questions, you may contact (or if you are represented by an attorney, please have your attorney contact) Joseph J. LoBianco of the DEM's Office of Legal Services at (401) 222-6607. All other inquiries should be directed to Tracey Tyrrell of the DEM's Office of Compliance and Inspection at (401) 222-1360 ext. 7407.

Please be advised that any such inquiries do not postpone, eliminate, or otherwise extend the need for a timely submittal of a written request for a hearing, as described in Section G above.

FOR THE DIRECTOR

By: _____
David E. Chopy, Chief
DEM Office of Compliance and Inspection

Dated: _____

CERTIFICATION

I hereby certify that on the _____ day of _____
the within Notice of Violation was forwarded to:

Branca Brothers, Inc.
c/o Joseph P. Branca, Registered Agent
65 Starr Street
Johnston, RI 02919

Daniel Branca Life Estate
50 Starr Street
Johnston, RI 02919

by Certified Mail.



ADMINISTRATIVE PENALTY SUMMARY

Program: OFFICE OF COMPLIANCE AND INSPECTION, HAZARDOUS WASTE
 File No.: OCI-HW-17-84
 Respondent: Branca Brothers, Inc.

GRAVITY OF VIOLATION					
SEE ATTACHED "PENALTY MATRIX WORKSHEETS."					
VIOLATION No. & CITATION	APPLICATION OF MATRIX		PENALTY CALCULATION		AMOUNT
	Type	Deviation	Penalty from Matrix	Number or Duration of Violations	
D (4) – Used Oil Container Labeling	Type I <i>(\$25,000 Max. Penalty) *</i>	Minor	\$2,500	1	\$2,500
D (5) – Open Used Oil Container	Type I <i>(\$25,000 Max. Penalty) *</i>	Minor	\$2,500	1	\$2,500
D (3) and (6) – Used Oil Spill Response	Type I <i>(\$25,000 Max. Penalty) *</i>	Minor	\$2,500	1	\$2,500
D (7) – Universal Waste Labeling	Type I <i>(\$25,000 Max. Penalty) *</i>	Minor	\$2,500	1	\$2,500
SUB-TOTAL					\$10,000

*Maximum Penalties represent the maximum penalty amounts per day, per violation.

ECONOMIC BENEFIT FROM NONCOMPLIANCE

COSTS OF COMPLIANCE, EQUIPMENT, O&M, STUDIES OR OTHER DELAYED OR AVOIDED COSTS, INCLUDING INTEREST AND/OR ANY COMPETITIVE ADVANTAGE DERIVED OVER ENTITIES THAT COMPLY. NOTE: ECONOMIC BENEFIT MUST BE INCLUDED IN THE PENALTY UNLESS:

- THERE IS NO IDENTIFIABLE BENEFIT FROM NONCOMPLIANCE; OR
- THE AMOUNT OF ECONOMIC BENEFIT CAN NOT BE QUANTIFIED.

A review of the record in this matter has revealed that Respondent has either enjoyed no identifiable benefit from the noncompliance alleged in this enforcement action or that the amount of economic benefit that may have resulted can not be quantified.

ADMINISTRATIVE PENALTY SUMMARY (continued)

COST RECOVERY

ADDITIONAL OR EXTRAORDINARY COSTS INCURRED BY THE DIRECTOR DURING THE INVESTIGATION, ENFORCEMENT AND RESOLUTION OF AN ENFORCEMENT ACTION (EXCLUDING NON-OVERTIME PERSONNEL COSTS), FOR WHICH THE STATE IS NOT OTHERWISE REIMBURSED.

A review of the record in this matter has revealed that the DEM has not incurred any additional or extraordinary costs during the investigation, enforcement and resolution of this enforcement action (excluding non-overtime personnel costs), for which the State is not otherwise reimbursed.

TOTAL PENALTY PROPOSED UNDER PENALTY REGULATIONS = \$10,000

PENALTY MATRIX WORKSHEET

CITATION: Used Oil Container Labeling
 VIOLATION NO.: D (4)

TYPE		
<u> X </u> TYPE I DIRECTLY related to protecting health, safety, welfare or environment.	<u> </u> TYPE II INDIRECTLY related to protecting health, safety, welfare or environment.	<u> </u> TYPE III INCIDENTAL to protecting health, safety, welfare or environment.

DEVIATION FROM THE STANDARD
 THE DEGREE TO WHICH A VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.

FACTORS CONSIDERED:

Taken from Part 1.10.A.1.b of the DEM's *Rules and Regulations for Assessment of Administrative Penalties*

- (1) **The extent to which the act or failure to act was out of compliance:** Respondent failed to label containers holding used oil. The requirement to label containers holding used oil is an integral part of the regulatory program because this requirement reduces the potential for mismanagement of waste. Proper labeling provides important information regarding the chemical properties of the waste for emergency responders who may be called to a facility during a fire, spill or release.
- (2) **Environmental conditions:** Considered, but not utilized for this calculation.
- (3) **Amount of the pollutant:** Two containers, a 5-gallon and a 1-gallon holding approximately six gallons of used oil, that were not labeled as required by regulation.
- (4) **Toxicity or nature of the pollutant:** Used oil is known to cause soil contamination when released to the environment and may contain constituents that are suspected human carcinogens.
- (5) **Duration of the violation:** Unknown. The DEM first discovered the violation on 12 September 2017.
- (6) **Areal extent of the violation:** Considered, but not utilized in this calculation.

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- (7) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent failed to take reasonable and appropriate steps to prevent the violation by properly labeling the containers holding used oil.
- (8) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** Respondent previously failed to comply with the DEM's Hazardous Waste Regulations in a Letter of Non-Compliance dated 24 October 2013.
- (9) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Respondent had complete control over the occurrence of the violation and failed to take steps to prevent the occurrence.
- (10) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized in this calculation.

MAJOR	MODERATE	<u> X </u> MINOR
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$25,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	MAJOR	\$12,500 to \$25,000	\$6,250 to \$12,500	\$2,500 to \$6,250
	MODERATE	\$6,250 to \$12,500	\$2,500 to \$6,250	\$1,250 to \$2,500
	MINOR	\$2,500 to \$6,250 \$2,500	\$1,250 to \$2,500	\$250 to \$1,250

PENALTY MATRIX WORKSHEET

CITATION: Open Used Oil Containers

VIOLATION NO.: D (5)

TYPE		
<p style="text-align: center;"><u> X </u> TYPE I</p> <p><u>DIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;">___ TYPE II</p> <p><u>INDIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;">___ TYPE III</p> <p><u>INCIDENTAL</u> to protecting health, safety, welfare or environment.</p>
DEVIATION FROM THE STANDARD		
THE DEGREE TO WHICH A VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.		
<p>FACTORS CONSIDERED:</p> <p>Taken from Part 1.10.A.1.b of the DEM's <i>Rules and Regulations for Assessment of Administrative Penalties</i></p> <ol style="list-style-type: none"> (1) The extent to which the act or failure to act was out of compliance: Respondent failed to keep a container holding used oil closed except when adding or removing waste as required by regulation. The requirement to keep containers holding used oil closed when not in use is an integral part of the regulatory program because this requirement reduces the potential for spills and releases to occur. (2) Environmental conditions: Considered, but not utilized for this calculation. (3) Amount of the pollutant: One 5-gallon container holding used oil. (4) Toxicity or nature of the pollutant: Used oil is known to cause soil contamination when released to the environment and may contain constituents that are suspected human carcinogens. (5) Duration of the violation: Unknown. The DEM first discovered the violation on 12 September 2017. (6) Areal extent of the violation: Considered, but not utilized in this calculation. <p style="text-align: right; margin-top: 20px;">(continued)</p>		

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- (7) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent failed to take reasonable and appropriate steps to prevent the violation by keeping the container holding used oil closed when not in use.
- (8) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** Considered, but not utilized in this calculation.
- (9) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Respondent had complete control over the occurrence of the violation and failed to take steps to prevent the occurrence.
- (10) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized in this calculation.

MAJOR	MODERATE	<u> X </u> MINOR
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$25,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	MAJOR	\$12,500 to \$25,000	\$6,250 to \$12,500	\$2,500 to \$6,250
	MODERATE	\$6,250 to \$12,500	\$2,500 to \$6,250	\$1,250 to \$2,500
	MINOR	\$2,500 to \$6,250 \$2,500	\$1,250 to \$2,500	\$250 to \$1,250

PENALTY MATRIX WORKSHEET

CITATION: Used Oil Spill Response

VIOLATION NO.: D (3) and (6)

TYPE		
<p style="text-align: center;"><u> X </u> TYPE I</p> <p><u>DIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;">___ TYPE II</p> <p><u>INDIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;">___ TYPE III</p> <p><u>INCIDENTAL</u> to protecting health, safety, welfare or environment.</p>
DEVIATION FROM THE STANDARD		
THE DEGREE TO WHICH A VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.		
<p>FACTORS CONSIDERED:</p> <p>Taken from Part 1.10.A.1.b of the DEM's <i>Rules and Regulations for Assessment of Administrative Penalties</i></p> <ol style="list-style-type: none"> (1) The extent to which the act or failure to act was out of compliance: Respondent failed to immediately clean up spills or releases of used oil on the Property. The requirement to immediately clean up a spill or release of used oil is an integral part of the regulatory program because this requirement reduces the potential for a spill or release to impact soil, surface waters and groundwater resources. (2) Environmental conditions: Considered, but not utilized for this calculation. (3) Amount of the pollutant: DEM's inspector observed two areas on the Property that were impacted by a spill or unplanned release of used oil. (4) Toxicity or nature of the pollutant: Used oil is known to cause soil contamination when released to the environment and may contain constituents that are suspected human carcinogens. (5) Duration of the violation: Unknown. The DEM first discovered the violation on 12 September 2017. (6) Areal extent of the violation: Considered, but not utilized in this calculation. 		
(continued)		

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- (7) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent failed to take reasonable and appropriate steps to prevent the violation by failing to immediately clean up spills and/or releases of used oil.
- (8) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** Respondent previously failed to comply with the DEM's Hazardous Waste Regulations in a Letter of Non-Compliance dated 24 October 2013.
- (9) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Respondent had complete control over the occurrence of the violation and failed to take steps to prevent the occurrence.
- (10) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized in this calculation.

MAJOR	MODERATE	<u> X </u> MINOR
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$25,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	MAJOR	\$12,500 to \$25,000	\$6,250 to \$12,500	\$2,500 to \$6,250
	MODERATE	\$6,250 to \$12,500	\$2,500 to \$6,250	\$1,250 to \$2,500
	MINOR	\$2,500 to \$6,250 \$2,500	\$1,250 to \$2,500	\$250 to \$1,250

PENALTY MATRIX WORKSHEET

CITATION: Universal Waste Labeling

VIOLATION NO.: D (7)

TYPE		
<p style="text-align: center;"><u> X </u> TYPE I</p> <p><u>DIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;">_____ TYPE II</p> <p><u>INDIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;">_____ TYPE III</p> <p><u>INCIDENTAL</u> to protecting health, safety, welfare or environment.</p>
DEVIATION FROM THE STANDARD		
THE DEGREE TO WHICH A VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.		
<p>FACTORS CONSIDERED:</p> <p>Taken from Part 1.10.A.1.b of the DEM's <i>Rules and Regulations for Assessment of Administrative Penalties</i></p> <ol style="list-style-type: none"> (1) The extent to which the act or failure to act was out of compliance: Respondent failed to properly label universal waste batteries as required by regulation. The requirement to label universal waste is a core element of the regulatory program because it reduces the potential for mismanagement and/or improper disposal of universal waste. (2) Environmental conditions: Considered, but not utilized for this calculation. (3) Amount of the pollutant: One unmarked battery. (4) Toxicity or nature of the pollutant: The universal waste contains sulfuric acid which is corrosive and capable of causing harm to human health and the environment. (5) Duration of the violation: The DEM first discovered the violation on 12 September 2017. (6) Areal extent of the violation: Considered, but not utilized in this calculation. <p style="text-align: right; margin-top: 20px;">(continued)</p>		

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- (7) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent failed to take reasonable and appropriate steps to prevent the violation by labeling the universal waste battery.
- (8) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** Respondent previously failed to comply with the DEM's Hazardous Waste Regulations in a Letter of Non-Compliance dated 24 October 2013.
- (9) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Respondent had complete control over the occurrence of the violation and failed to take steps to prevent the occurrence.
- (10) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized in this calculation.

MAJOR	MODERATE	<u> X </u> MINOR
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$25,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	MAJOR	\$12,500 to \$25,000	\$6,250 to \$12,500	\$2,500 to \$6,250
	MODERATE	\$6,250 to \$12,500	\$2,500 to \$6,250	\$1,250 to \$2,500
	MINOR	\$2,500 to \$6,250 \$2,500	\$1,250 to \$2,500	\$250 to \$1,250