

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

OFFICE OF COMPLIANCE & INSPECTION

IN RE: The Housing Authority of the City of Pawtucket

FILE NO.: UST 10-03540

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 party (“Respondent”) has violated certain statutes and/or administrative regulations under DEM's jurisdiction.

B. Administrative History

In calendar years 2000 and 2001 DEM issued letters to the Housing Authority for an unregistered underground storage tank containing diesel fuel at the Kennedy Manor that is used for an emergency generator. The Housing Authority subsequently registered the tank with DEM. In 2002, DEM notified the Housing Authority that the tank lacked a spill containment basin and overfill protection. In calendar year 2010 DEM inspected the Kennedy Manor and Fogarty Manor. DEM observed the same violations at the Kennedy Manor as were present in 2002 as well as new violations. DEM also observed the same violations for an unregistered underground storage tank containing diesel fuel at the Fogarty Manor that is used for an emergency generator.

C. Facts

- (1) The subject properties are located at 175 Broad Street (“Kennedy Manor”) and 214 Roosevelt Avenue (“Fogarty Manor”) in the city of Pawtucket, Rhode Island.
- (2) Kennedy Manor includes a multi-story residential apartment building and underground storage tank (“UST” or “tank”) used for storage of petroleum product (the “Kennedy Manor Facility”).
- (3) Fogarty Manor includes a multi-story residential apartment building and UST used for storage of petroleum product (the “Fogarty Manor Facility”).
- (4) Respondent owns Kennedy Manor and Fogarty Manor.
- (5) Respondent operates Kennedy Manor Facility and Fogarty Manor Facility.

- (6) Kennedy Manor Facility and Fogarty Manor Facility are subject to the DEM's Rules and Regulations for Underground Storage Facilities Used for Petroleum Products and Hazardous Materials, as amended (the "UST Regulations").
- (7) Kennedy Manor Facility is registered with DEM in accordance with Section 6.00 of the UST Regulations and is identified as UST Facility No. 03540.
- (8) The UST is for an emergency generator and is registered with DEM as follows:

UST ID No.	Date Installed	Capacity	Substance Stored
003	unknown	1,000 gallons	Diesel Fuel

- (9) Fogarty Manor Facility is not registered with DEM.
- (10) On 8 October 2010, DEM inspected Kennedy Manor Facility and Fogarty Manor Facility.
- (11) The Fogarty Manor Facility inspection revealed the following:
 - (a) A UST used for storage of diesel fuel for an emergency generator.
 - (b) The UST was not equipped with an automatic tank gauging system ("ATG").
 - (c) No records were available to confirm that the UST was ever tested for tightness.
 - (d) No records were available to confirm that the UST product pipelines were ever tested for tightness.
 - (e) The UST was not equipped with a spill containment basin.
 - (f) The UST was not equipped with overfill protection.
 - (g) The UST was not equipped with a submerged fill tube.
 - (h) The UST fill port was not labeled.
- (12) The Kennedy Manor Facility inspection revealed the following:
 - (a) The UST was not equipped with an ATG.
 - (b) No records were available to confirm that the UST was ever tested for tightness.
 - (c) No records were available to confirm that the UST product pipelines were ever tested for tightness.
 - (d) The UST was not equipped with a spill containment basin.

- (e) The UST was not equipped with overfill protection.
 - (f) The UST was not equipped with a submerged fill tube.
 - (g) The UST fill port was not labeled.
- (13) As of the date of this Notice of Violation (“NOV”), the Respondent has failed to comply with the UST Regulations.

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) **UST Regulations, Rule 6.02** – prohibiting the operation of USTs that are not registered with DEM.
- (2) **UST Regulations, Rule 8.08 (D)(2)(a)** – requiring the owner/operator install and operate an approved ATG.
- (3) **UST Regulations, Rule 8.08 (D)(2)(c)** – requiring the owner/operator to retain a licensed tightness tester to perform a tank tightness test at five year intervals once a monitoring device has been installed, until such time as the tank has been installed for a period of twenty years and once every two years thereafter.
- (4) **UST Regulations, Rule 8.09 (B)(3)** – requiring the owner/operator to retain a licensed tightness tester to perform tightness testing of product pipelines five, eight, eleven and thirteen years after installation and once every two years thereafter.
- (5) **UST Regulations, Rule 8.16 (A)(1)** – requiring the owner/operator to install spill containment basins around all UST fill pipes.
- (6) **UST Regulations, Rule 8.16 (B)** – requiring the owner/operator to equip USTs with overfill protection.
- (7) **UST Regulations, Rule 8.17** – requiring the owner/operator to equip USTs with submerged fill tubes.
- (8) **UST Regulations, Rule 8.18** – requiring the owner/operator to permanently label, or otherwise permanently mark, all fill pipes and/or fill box covers so that the product inside the tank is identified.

E. Order

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

- (1) **Within ninety days of receipt of this NOV**, submit permanent closure applications to the DEM – Office of Waste Management (the “OWM”) and complete the removal of the USTs at the Kennedy Manor and Fogarty Manor in accordance with Section 13.00 of the UST Regulations.
- (2) **Within thirty days of the removal of the USTs**, complete and submit to OWM closure assessments in accordance with Section 13.11 of the UST Regulations, the UST Closure Assessment Guidelines, and Section 13.00 of DEM’s Oil Pollution Control Regulations (the “Closure Assessment”).
- (3) **Within thirty days of the removal of the USTs**, remove and properly dispose of any contaminated soil encountered during the tank closures and within ten days of the soil disposal, submit documentation of disposal to OWM in accordance with Section 13 of DEM’s Oil Pollution Control Regulations.
- (4) If, after review of the Closure Assessment, OWM determines that a Site Investigation (the “SI”) is required, complete the SI and submit a Site Investigation Report (the “SIR”) to OWM in accordance with Rules 12.08, 12.09, and 12.10 of the UST Regulations within the time frame specified by OWM.
- (5) If, after review of the SIR, OWM determines that a Corrective Action Plan (the “CAP”) is required, complete a CAP in accordance with Rules 12.12 through 12.18 of the UST Regulations within the time frame specified by OWM. The CAP must be implemented in accordance with any Order of Approval issued by OWM.

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 each named respondent:

Seventy Eight Thousand Four Hundred Sixty-Eight Dollars (\$78,468.00)

- (2) The proposed administrative penalty is calculated pursuant to the DEM Rules and Regulations for Assessment of Administrative Penalties, as amended, and must be paid to the Director within twenty days of your receipt of this NOV. Payment shall be in the form of a check made payable to the “General Treasury - Water & Air Protection Program Account” 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 this 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 this 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 Administrative Adjudication Division regarding the allegations, orders and/or penalties set forth in Sections 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 DEM's Administrative Adjudication Division, at the following address, within twenty 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, 3RD Floor
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 Rule 7.00(b) of the DEM Administrative Rules of Practice and Procedure for the Administrative Adjudication Division of 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 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 with regard to any violation set forth herein, then this 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 (v) and 42-17.6-4(b) and (c).
- (5) Failure to comply with this NOV may subject each respondent to additional civil and/or criminal penalties.
- (6) This 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 at the DEM Office of Legal Services at (401) 222-6607. All other inquiries should be directed to Tracey D'Amadio Tyrrell of the DEM 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

David E. Chopy, Chief

DEM Office of Compliance and Inspection

Date: _____

CERTIFICATION

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

Stephen A. Vadnais, Executive Director
The Housing Authority of the City of Pawtucket
214 Roosevelt Avenue
P.O. Box 1303
Pawtucket, RI 02862-1303

by Certified Mail.



ADMINISTRATIVE PENALTY SUMMARY

Program: OFFICE OF COMPLIANCE AND INSPECTION, UST
 File No.: UST 2010 – 03540
 Respondent: The Housing Authority of the City of Pawtucket

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 (1) – Operating an unregistered UST	Type I (\$ <u>25,000</u> Max. Penalty)*	Major	\$12,500	1	\$12,500.00
D (2), (3) & (4) - Failure to install an ATG and failure to perform tightness testing of the tanks and lines	Type II (\$ <u>12,500</u> Max. Penalty)*	Major	\$6,250	2	\$12,500.00
D (5), (6) & (7) – Failure to equip the USTs with spill containment basins, overfill protection and submerged fill tubes	Type II (\$ <u>12,500</u> Max. Penalty)*	Major	\$6,250	2	\$12,500.00
SUB-TOTAL					\$37,500.00

*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 ARE IN COMPLIANCE. 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.

DESCRIPTION OF BENEFIT	CALCULATION	AMOUNT
Cost to install ATGs	2 UST systems at \$16,833 per system	\$33,666.00
Cost of tightness testing	2 UST systems X 3 years = 6 missing tests @ \$439.00 per test	\$2,634.00
Cost of spill containment basins	2 USTs @ \$1,262.00 per tank	\$2,524.00
Cost of overfill protection	2 USTs @ \$872.00 per tank	\$1,744.00
Cost of submerged fill tubes	2 USTs @ \$200.00 per tank	\$400.00
SUB-TOTAL		\$40,968.00

TOTAL PENALTY PROPOSED UNDER PENALTY REGULATIONS = \$ 78,468.00

PENALTY MATRIX WORKSHEET

CITATION: *Operating an unregistered UST*
 VIOLATION NO.: D (1)

TYPE		
<p><u>X</u> TYPE I <u>DIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p>TYPE II <u>INDIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p>____TYPE III <u>INCIDENTAL</u> to protecting health, safety, welfare or environment.</p>
DEVIATION FROM THE STANDARD		
<small>THE DEGREE TO WHICH A PARTICULAR VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.</small>		
<p><u>FACTORS CONSIDERED:</u></p> <p>Taken from Section 10 (a) (2) of the DEM <i>Rules and Regulations for Assessment of Administrative Penalties</i></p> <p>(A) The extent to which the act or failure to act was out of compliance: Respondent failed to register the UST at Fogarty Manor. The failure to register a regulated tank prevents DEM from ensuring that the tank meets the requirements for corrosion protection, leak prevention and leak detection.</p> <p>(B) Environmental conditions: The Fogarty Manor Facility is located in a GB groundwater classification zone, which are groundwater resources designated as unsuitable for drinking water use without treatment. Upon information and belief, there are no drinking water supply wells proximate to the facility. The facility is located within 500 feet of the Blackstone River.</p> <p>(C) Amount of the pollutant: Not relevant.</p> <p>(D) Toxicity or nature of the pollutant: Diesel fuel is capable of causing significant soil and groundwater contamination if released to the environment. Certain petroleum constituents are potentially harmful to human health and safety and the environment.</p> <p>(E) Duration of the violation: Respondent has been non-compliant since April 1985. The penalty is being assessed for the non-compliance occurring since July 2005.</p> <p>(F) Areal extent of the violation: Not relevant.</p>		
(continued)		

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- (G) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent failed to prevent or mitigate the non-compliance by registering the UST with DEM.
- (H) **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:** Not relevant.
- (I) **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:** The Respondent was aware of the requirement to register USTs with DEM. DEM issued letters to the Respondent in calendar years 2000 and 2001 requiring registration of a similar UST at Kennedy Manor. The Respondent subsequently registered the UST at Kennedy Manor with DEM in November 2001.
- (J) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Not relevant.

<u>X</u> MAJOR	MODERATE	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 \$12,500	\$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	\$1,250 to \$2,500	\$250 to \$1,250

PENALTY MATRIX WORKSHEET

CITATION: *Failure to install an ATG and failure to perform tightness testing of the tanks and lines*
 VIOLATION NO.: D (2), (3) and (4)

TYPE		
<p style="text-align: center;"><u> </u> TYPE I</p> <p><u>DIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;">X TYPE II</p> <p><u>INDIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;"><u> </u> TYPE III</p> <p><u>INCIDENTAL</u> to protecting health, safety, welfare or environment.</p>
DEVIATION FROM THE STANDARD		
THE DEGREE TO WHICH A PARTICULAR VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.		
<p><u>FACTORS CONSIDERED:</u></p> <p>Taken from Section 10 (a) (2) of the DEM <i>Rules and Regulations for Assessment of Administrative Penalties</i></p> <p>(A) The extent to which the act or failure to act was out of compliance: Respondent failed to install ATGs for both USTs and failed to procure the services of a licensed tightness tester to perform tightness testing of the tanks and lines at least once every two years. ATGs are used to perform 0.2 gallon per hour leak tests at least once per month. The 0.2 gallon per hour leak tests and tightness tests are important, required components of release detection programs at UST facilities. Failure to perform these tests would reduce the likelihood of detecting a release from a UST.</p> <p>(B) Environmental conditions: The facilities are both located in a GB groundwater classification zone, which are groundwater resources designated as unsuitable for drinking water use without treatment. Upon information and belief, there are no drinking water supply wells proximate to the facilities. The Fogarty Manor is located within 500 feet of the Blackstone River. Both facilities are located in the Blackstone River watershed.</p> <p>(C) Amount of the pollutant: Not relevant.</p> <p>(D) Toxicity or nature of the pollutant: Diesel fuel is capable of causing significant soil and groundwater contamination if released to the environment. Certain petroleum constituents are potentially harmful to human health and safety and the environment.</p> <p>(E) Duration of the violation: Respondent has been non-compliant with the release detection requirements since May 1987. The penalty is being assessed for the non-compliance occurring since July 2005. Tightness testing of the tanks and lines should have been performed during each of the years 2006, 2008 and 2010.</p> <p>(F) Areal extent of the violation: Not relevant.</p>		
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- (G) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent failed to prevent or mitigate the noncompliance by testing the tanks and product pipelines and equipping each tank with an ATG.
- (H) **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:** Not relevant.
- (I) **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:** Negligence is attributable to Respondent for the failure to comply immediately with the requirements set forth in the UST regulations. Respondent, as owner and operator of the facilities, had complete control over the occurrence of the violations. The UST system leak detection requirements are clearly established in the UST regulations.
- (J) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Not relevant.

<u> X </u> MAJOR	MODERATE	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 \$6,250	\$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	\$1,250 to \$2,500	\$250 to \$1,250

PENALTY MATRIX WORKSHEET

CITATION: *Failure to equip the USTs with spill containment basins, overflow protection and submerged fill tubes*

VIOLATION NO.: D (5), (6) and (7)

TYPE		
<p style="text-align: center;">___ TYPE I</p> <p><u>DIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;"><u>X</u> 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		
<p>THE DEGREE TO WHICH A PARTICULAR VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.</p>		
<p><u>FACTORS CONSIDERED:</u></p> <p>Taken from Section 10 (a) (2) of the DEM <i>Rules and Regulations for Assessment of Administrative Penalties</i></p> <p>(A) The extent to which the act or failure to act was out of compliance: Respondent failed to install spill containment basins around the fill pipes for the USTs or equip the USTs with an approved overflow protection device and submerged fill tubes. Failure to equip USTs with spill containment basins and overflow protection increases the likelihood of a release of the regulated substance from the USTs. These devices are designed to prevent spills and overflowing of hazardous materials, which have historically been proven to be frequent, significant causes of releases from UST systems. DEM has no knowledge of a release from these UST systems at this time.</p> <p>(B) Environmental conditions: The facilities are both located in a GB groundwater classification zone, which are groundwater resources designated as unsuitable for drinking water use without treatment. Upon information and belief, there are no drinking water supply wells proximate to the facilities. The Fogarty Manor is located within 500 feet of the Blackstone River. Both facilities are located in the Blackstone River watershed.</p> <p>(C) Amount of the pollutant: Not relevant.</p> <p>(D) Toxicity or nature of the pollutant: Diesel fuel is capable of causing significant soil and groundwater contamination if released to the environment. Certain petroleum constituents are potentially harmful to human health and safety and the environment.</p> <p>(E) Duration of the violation: Respondent has been non-compliant with the release prevention requirements since May 1987. Respondent has been non-compliant with the submerged fill tube requirement since 2002. The penalty is being assessed for the non-compliance occurring since July 2005.</p> <p>(F) Areal extent of the violation: Not relevant.</p>		
<p>(continued)</p>		

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- (G) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent failed to prevent or mitigate the non-compliance by installing spill containment basins, overfill protection and submerged fill tubes.
- (H) **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:** Not relevant.
- (I) **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:** Negligence is attributable to Respondent for the failure to comply immediately with the requirements set forth in the UST regulations. Respondent, as owner and operator of the facilities, had complete control over the occurrence of the violations. The UST system leak prevention and submerged fill tube requirements are clearly established in the UST regulations.
- (J) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Not relevant.

<u> X </u> MAJOR	MODERATE	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 \$6,250	\$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	\$1,250 to \$2,500	\$250 to \$1,250