

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

OFFICE OF COMPLIANCE & INSPECTION

**IN RE: Veolia Water North America
Operating Services, LLC**

**File Nos.: OCI-WP-15-83
X-ref RIPDES RI0100013**

City of Cranston

NOTICE OF VIOLATION

A. Introduction

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. Facts

- (1) The City of Cranston (“Cranston”) owns a wastewater collection and treatment system (the “Facility”).
- (2) Veolia Water North America Operating Services, LLC (“Veolia”) operates the Facility on behalf of Cranston.
- (3) On 30 September 2008, the DEM issued to Cranston Rhode Island Pollutant Discharge Elimination System (“RIPDES”) Permit No. RI0100013 (the “Permit”), which became effective on 1 December 2008.
- (4) The Permit authorizes Cranston to discharge treated wastewater from the Facility to the Pawtuxet River through outfall 001A.
- (5) The Permit does not authorize Cranston to discharge wastewater from the Facility to any other waters of the State or from any location other than outfall 001A.
- (6) The Permit requires Cranston to:
 - (a) Take all reasonable steps to minimize or prevent any discharge which has a reasonable likelihood of adversely affecting human health or the environment; and
 - (b) Properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used to achieve compliance.
- (7) On 21 May 2009, the DEM received an operation and maintenance manual for the Facility wastewater collection system (the “Collection System O&M Manual”).

Sherman Avenue Pumping Station (“SPS”) Wastewater Release

- (8) On or about 21 August 2015, the DEM received written reports from Veolia. The reports stated that:
 - (a) On 14 August 2015, Veolia operators released approximately 30,000 gallons of wastewater from the SPS to Meshanticut Brook after one of the pumps at the station separated from its casing (the “SPS Release”);
 - (b) The SPS Release was caused by excessive vibration of the pump for an extended period;
 - (c) The main station communication system was inoperable (and had been since 4 August 2015 due to a storm on that day);
 - (d) On 16 August 2015, Veolia operators observed wastewater discharging from the collection system on Ambrose Street to Angells Pond (the “AS Release”);
 - (e) The AS Release may have been ongoing for 3 days, as Facility operators believe it was caused by surcharges in the collection system resulting from the pump failure at the SPS on 14 August 2015 and operational issues with a bypass pumping system set up by facility operators to manage flows at the station while facility operators repaired the SPS; and
 - (f) The AS Release resulted in the discharge of between 500 and 2,750 gallons of wastewater to Angell’s Pond.
- (9) On 14 August 2015, after the DEM was notified of the SPS Release, the DEM and the Department of Health issued an advisory to the public to refrain from contact recreation along the Meshanticut Brook from 14 August 2015 through 16 August 2015.
- (10) Meshanticut Brook and Angells Pond are classified under the DEM’s *Water Quality Regulations* as Class B. These waters are designated for fish and wildlife habitat, primary and secondary contact recreational activities, and to have good aesthetic value.
- (11) Meshanticut Brook does not meet its assigned water quality designation according to the DEM’s *2014 Integrated Water Quality Monitoring and Assessment List Final May 2015*. The cause of the impairment is enterococcus bacteria, which is an indicator of the presence of wastewater.
- (12) The SPS Release further degraded the water quality of Meshanticut Brook.

Howard Pumping Station (“HPS”) Wastewater Release

- (13) On 26 May 2017, Veolia submitted a written report to the DEM. The report stated that:
 - (a) On 22 May 2017, Veolia operators observed wastewater discharging from the collection system at the HPS (the “HPS Release”);
 - (b) The HPS Release resulted in the discharge of approximately 4,100 gallons of wastewater to catch basins and a storm water retention basin and approximately 41,550 gallons to the Pawtuxet River;

- (c) The HPS Release was caused by a failure of the pump station’s uninterruptable power supply unit;
 - (d) The Veolia operators did not respond to a ‘loss of communication’ alarm from the HPS, as the operators thought it was false because of ongoing reliability issues with the City-wide telecommunications system;
 - (e) The backup alarm was inoperable because the float switch was clogged with grease and debris;
 - (f) A pipe was discovered within a structure upstream of the HPS (the “Overflow Pipe”) that had a gate that was not properly sealed (the “Improperly Sealed Gate”);
 - (g) Wastewater entered the Pawtuxet River from the Overflow Pipe through the Improperly Sealed Gate; and
 - (h) On 2 May 2017, a Veolia operator inspected the HPS and completed an inspection report. The report has a box to indicate that the backup alarm is operating properly; however, the box was not checked.
- (14) Pawtuxet River in the location of the HPS Release is classified under the DEM’s *Water Quality Regulations* as Class B1. These waters are designated for fish and wildlife habitat, primary and secondary contact recreational activities, and to have good aesthetic value; however, primary contact recreational activities may be impacted due to pathogens from approved wastewater discharges.
- (15) Pawtuxet River in the location of the HPS Release does not meet its assigned water quality designation according to the DEM’s *2014 Integrated Water Quality Monitoring and Assessment List Final May 2015*. One cause of the impairment is enterococcus bacteria, which is an indicator of the presence of wastewater.
- (16) The HPS Release further degraded the water quality of Pawtuxet River.
- (17) The Overflow Pipe is not identified in the Permit.

C. 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(a)** – prohibiting the placement of any pollutant in a location where it is likely to enter the waters of the State.
- (2) **R.I. Gen. Laws, Section 46-12-5(b)** – requiring the discharge of any pollutant into waters of the State comply with the terms and conditions of a permit and applicable regulations.

(3) **DEM's Water Quality Regulations**

- (a) **Rule 9(A)** – prohibiting the discharge of pollutants into any waters of the State or any activity alone or in combination which the DEM determines will likely result in the violation of any State water quality criterion or interfere with one or more of the existing or designated uses assigned to the receiving waters.
- (b) **Rule 9(B)** – prohibiting the discharge of pollutants in concentrations that will further degrade the water quality of an impaired waterbody.
- (c) **Rule 11(B)** – requiring the discharge of pollutants into the waters of the State comply with the terms and conditions of a permit issued by the DEM.
- (d) **Rule 13(A)** – prohibiting the discharge of any pollutant into or conducting any activity which will likely cause or contribute pollution to the waters of the State.
- (e) **Rule 16(A)** – mandating compliance with all terms, conditions, management practices and operation and maintenance requirements set forth in a permit.

(4) **DEM's Regulations for the Rhode Island Pollutant Discharge Elimination System**

- (a) **Rule 14.02(a)** – requiring the permittee to comply with all conditions of the permit.
- (b) **Rule 14.05** – requiring the permittee to take all reasonable steps to minimize or prevent a discharge in violation of the permit.
- (c) **Rule 14.06** – requiring the permittee to maintain in good working order and operate as efficiently as possible all treatment works to achieve compliance with the permit.

(5) **DEM's Rules and Regulations for the Operation and Maintenance of Wastewater Treatment Facilities, Rule 5A (recently amended to Part 4.5A)** – requiring a facility to be maintained in good working order and operated as efficiently as possible.

D. 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:

- (1) **Within 7 days of receipt of this Notice of Violation (“NOV”)**, implement a minimum frequency of weekly Facility operator inspections of the Facility wastewater pumping stations.

- (2) **Within 30 days of receipt of the NOV**, inspect each Facility wastewater pumping station for the existence of unpermitted structures and outfalls and submit a report of the inspection findings to the DEM. The report must include a reasonable schedule to seal, cap or remove each structure or outfall that is identified.
- (3) **Within 30 days of receipt of the NOV**, develop more detailed inspection forms/work orders to document Facility operator inspections of the Facility wastewater pumping stations and collection system, revise the Collection System O&M Manual to incorporate the inspection forms/work orders and submit the manual to the DEM.
- (4) **Within 30 days of receipt of the NOV**, complete refresher training for all the Facility operators responsible for inspecting the Facility wastewater collection system and provide to the DEM a list of operators that were trained and the training topics. The training shall include, but not be limited to, protocols for performing and documenting inspections.
- (5) All reports and other documents required in Section D above shall be subject to the DEM's review and approval. Upon review, the DEM shall provide written notification either granting formal approval or stating the deficiencies therein. Within 14 days (unless a longer time is specified) of receiving a notification of deficiencies, you must submit to the DEM additional information necessary to correct the deficiencies.

E. 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:

\$31,250

- (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, cashier's check or money order 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 Respondents 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.

F. 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 Sections B through E 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 the NOV. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and 42-17.7-9:

Administrative Clerk
DEM - Administrative Adjudication Division
One Capitol Hill, 2ND Floor
Providence, RI 02903

- (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 1.7(B) 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:

Christina Hoefsmits, 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) The NOV does not preclude the DEM 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) Christina Hoefsmit of the DEM's Office of Legal Services at (401) 222-6607. All other inquiries should be directed to David E. Chopy of the DEM's Office of Compliance and Inspection at (401) 222-1360 ext. 7400.

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 F above.

FOR THE DIRECTOR

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

Dated: _____

CERTIFICATION

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

City of Cranston
c/o The Honorable Allan W. Fung, Mayor
869 Park Avenue
Cranston, RI 02910

Veolia Water North America Operating Services, LLC
c/o CT Corporation System, Registered Agent
450 Veterans Memorial Parkway, Suite 7A
East Providence, RI 02914

by Certified Mail.



ADMINISTRATIVE PENALTY SUMMARY

Program: OFFICE OF COMPLIANCE AND INSPECTION, Water Pollution
 File No.: OCI-WP-15-83, x-ref RIPDES No. RI0100013
 Respondents: City of Cranston and Veolia Water North America Operating Services, LLC

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	
C (1) – C (5) SPS Release and AS Release	Type I (\$25,000 Max. Penalty) *	Major	\$12,500	1 violation	\$12,500
C (1) – C (5) HPS Release	Type I (\$25,000 Max. Penalty) *	Major	\$18,750	1 violation	\$18,750
SUB-TOTAL					\$31,250

*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 Respondents have either enjoyed no identifiable benefit from the noncompliance alleged in this enforcement action or that the amount of economic benefit that may have resulted cannot be quantified.

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 = \$31,250

PENALTY MATRIX WORKSHEET

CITATION: SPS Release and AS Release
 VIOLATION NO.: C (1) – C (5)

TYPE		
<u> X </u> TYPE I <u>DIRECTLY</u> related to protecting health, safety, welfare or environment.	<u> </u> TYPE II <u>INDIRECTLY</u> related to protecting health, safety, welfare or environment.	<u> </u> TYPE III <u>INCIDENTAL</u> to protecting health, safety, welfare or environment.
DEVIATION FROM THE STANDARD		
<small>THE DEGREE TO WHICH A VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.</small>		
FACTORS CONSIDERED:		
<p>Taken from Part 1.10A.1.b of the DEM's <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: Respondents released untreated wastewater to the waters of the State from the Facility's wastewater collection system because of a failed wastewater pump at the SPS. Preventing the release of untreated wastewater to the waters of the State is of major importance to the regulatory program.</p> <p>(B) Environmental conditions: The wastewater was discharged to Meshanticut Brook and Angells Pond. These waters are designated in the DEM's Water Quality Regulations as Class B. Among other uses, Class B waters are designated for fish and wildlife habitat, and primary and secondary contact recreational activities. Class B waters shall have good aesthetic value. Meshanticut Brook does not meet its assigned water quality designation according to the DEM's <i>2014 Integrated Water Quality Monitoring and Assessment List Final May 2015</i>. The cause of the impairment is enterococcus bacteria, which is an indicator of the presence of wastewater. The discharge occurred in August 2015, and the likelihood of recreational use is high.</p> <p>(C) Amount of the pollutant: Approximately 30,000 gallons to Meshanticut Brook and approximately 500 to 2,750 gallons to Angells Pond.</p> <p>(D) Toxicity or nature of the pollutant: Wastewater contains many kinds of bacteria, viruses, and parasites that can cause serious or fatal diseases in both humans and animals, as well as being the source of extremely objectionable odors. Also, the wastewater collection system includes waste from commercial and industrial operations, which can contain toxics (metal and organic compounds), phosphorous and nitrogen.</p> <p>(E) Duration of the violation: Wastewater was discharged to Meshanticut Brook for approximately 2 hours (8:00 AM to 10:00 AM) on 14 August 2015. Wastewater was discharged to Angells Pond for an unknown duration – may have been 3 days (14 August 2015 through 17 August 2015).</p> <p>(F) Areal extent of the violation: Unknown.</p>		
(continued)		

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- (G) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondents failed to take reasonable and appropriate steps to prevent the noncompliance. The noncompliance was caused by inadequate maintenance of the pumping station (resulting in the pump failure and the inoperable main alarm system). Veolia took reasonable steps to mitigate the noncompliance by employing the use of pumping trucks to pump wastewater from upstream manholes and discharge the wastewater to the wastewater collection system; however, during peak flows between 8:00 AM and 10:00 AM on 14 August 2015, Veolia intentionally discharged wastewater to Meshanticut Brook to prevent discharges from occurring elsewhere in the wastewater collection system. Veolia appropriately applied sodium hypochlorite to the wastewater. Respondents repaired the SPS and upgraded many components to prevent future occurrences of this nature.
- (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:** Considered, but not utilized for this calculation.
- (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:** Respondents had full control over the noncompliance. The noncompliance was the result of inadequate maintenance. The main alarm system was inoperable (and had been since August 4, 2015 due to a storm on that day). The noncompliance was foreseeable.
- (J) **Any other factor(s) that may be relevant in determining the amount of a penalty:** On 14 August 2015, after the DEM was notified of the SPS Release, the DEM and the Department of Health issued an advisory to the public to refrain from contact recreation along the Meshanticut Brook from 14 August 2015 through 16 August 2015.

<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: HPS Release
 VIOLATION NO.: C (1) – C (5)

TYPE		
<u> X </u> TYPE I <u>DIRECTLY</u> related to protecting health, safety, welfare or environment.	<u> </u> TYPE II <u>INDIRECTLY</u> related to protecting health, safety, welfare or environment.	<u> </u> TYPE III <u>INCIDENTAL</u> 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.		
<p>FACTORS CONSIDERED:</p> <p>Taken from Part 1.10A.1.b of the DEM's <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: Respondents released untreated wastewater to the waters of the State from the Facility's wastewater collection system because of a power loss at the HPS. Preventing the release of untreated wastewater to the waters of the State is of major importance to the regulatory program.</p> <p>(B) Environmental conditions: The wastewater was discharged to Pawtuxet River. Pawtuxet River in the location of the HPS Release is designated in the DEM's Water Quality Regulations as Class B1. Among other uses, Class B1 waters are designated for fish and wildlife habitat, and primary and secondary contact recreational activities; however, primary contact recreational activities may be impacted due to pathogens from approved wastewater discharges. Class B1 waters shall have good aesthetic value. Pawtuxet River in the location of the HPS Release does not meet its assigned water quality designation according to the DEM's <i>2014 Integrated Water Quality Monitoring and Assessment List Final May 2015</i>. One cause of the impairment is enterococcus bacteria, which is an indicator of the presence of wastewater. The discharge occurred on 22 May 2017, and the likelihood of recreational use is moderately high.</p> <p>(C) Amount of the pollutant: Approximately 4,100 gallons to catch basins and a storm water retention basin and approximately 41,500 gallons to Pawtuxet River.</p> <p>(D) Toxicity or nature of the pollutant: Wastewater contains many kinds of bacteria, viruses, and parasites that can cause serious or fatal diseases in both humans and animals, as well as being the source of extremely objectionable odors. Also, the wastewater collection system includes waste from commercial and industrial operations, which can contain toxics (metal and organic compounds), phosphorous and nitrogen.</p> <p>(E) Duration of the violation: Wastewater was discharged for approximately 1 hour (11:12 AM to 12:16 PM) on 22 May 2017.</p> <p>(F) Areal extent of the violation: Unknown.</p>		

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- (G) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondents failed to take reasonable and appropriate steps to prevent the noncompliance. The HPS failure was caused by a power loss; however, the cause of the noncompliance was the failure of the Facility operators to respond to a 'loss of communication alarm' because the operators thought it was false and an inoperable back up alarm (caused by lack of proper maintenance). Veolia took reasonable steps to mitigate the noncompliance by restoring power to the HPS within 15 minutes of receiving a call from a concerned citizen. Respondents repaired the HPS and upgraded components to prevent future occurrences of this nature.
- (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:** Considered, but not utilized for this calculation.
- (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:** Respondents had full control over the noncompliance. The noncompliance was the result of the failure of the Facility operators to respond to an alarm they thought was false and inadequate maintenance of the backup alarm. The HPS was inspected on 2 May 2017; however, the Facility operator failed to check off the box indicating that the backup alarm was determined to be in operable condition (which is an indication that the alarm was either not inspected or was not operable).
- (J) **Any other factor(s) that may be relevant in determining the amount of a penalty:** The wastewater was released through an overflow pipe located upstream of the HPS – the pipe is not identified on the Permit.

<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 \$18,750	\$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