

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

OFFICE OF COMPLIANCE & INSPECTION

IN RE: Greenwich Bay Enterprises, Inc.

FILE NO.: UST 2016-20-00649

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 the DEM's jurisdiction.

B. Administrative History

On 3 May 2016, the DEM issued a Notice of Intent to Enforce (the “NIE”) to Respondent for the violations that are the subject of this Notice of Violation (the “NOV”). The NIE required that Respondent take specific actions to correct the violations. On 9 May 2016, the NIE was delivered to Respondent. As of the date of the NOV, the violations have not been fully corrected.

C. Facts

- (1) The property is located at 252 Second Point Road, Assessor’s Plat 359, Lot 258 in the city of Warwick (the “Property”). The Property includes a marina and a motor fuel storage and dispensing system (the “Facility”).
- (2) Respondent owns the Property.
- (3) Respondent, d/b/a Brewer Greenwich Bay Marina, North, operates the Facility.
- (4) An underground storage tank (“UST” or “tank”) is located on the Property, which tank is used for storage of petroleum product and which is subject to the DEM’s *Rules and Regulations for Underground Storage Facilities Used for Petroleum Products and Hazardous Materials* (the “UST Regulations”).
- (5) The Facility is registered with the DEM and is identified as UST Facility No. 00649.

(6) The UST is registered with the DEM for the Facility as follows:

UST ID No.	Date Installed	Capacity	Product Stored
002	1983	6,000 gallons	Gasoline

(7) On 21 April 2016, the DEM inspected the Facility. The inspection revealed the following:

- (a) The flexible plastic secondary pipe for the land dispenser was cracked and damaged at grade. The damage allows for the potential exposure of the steel primary pipe to soil, which could lead to corrosion;
- (b) Written verification that the UST was tested for tightness by a DEM-licensed tightness tester during the year 2015 was not available, and a tightness test report has not been received by the DEM;
- (c) Written verification that the line leak detector for the UST was tested by a qualified person during the year 2014 was not available;
- (d) Written verification that the registered Class A/B UST facility operator, Mr. David McGhie, had performed monthly on-site Facility inspections during the time period of April 2014 through March 2016, including inspections of the continuous monitoring system (“CMS”), was not available;
- (e) The training log for the Class C UST facility operators included individuals who were no longer employed at the Facility and did not identify individuals who were working at the Facility at the time of the inspection; and
- (f) Mr. McGhie is no longer acting as the designated Class A/ B UST facility operator for the Facility and there are presently no International Code Council (“ICC”) certified Class A and Class B UST facility operators assigned to the Facility.

(8) On 17 May 2016, the DEM received a report from ELO2, INC. on behalf of Respondent. The report stated that the UST and its product pipeline were tested for tightness and that the line leak detector was tested and that they all met the criteria for passing.

(9) As of the date of issuance of the NOV, Respondent has failed to demonstrate full compliance with the findings described in Section C (7) above.

D. Violation

Based on the foregoing facts, the Director has reasonable grounds to believe that Respondent has violated the following regulations:

- (1) **DEM' UST Regulations, Rule 8.02(A)** – pertaining to operation and maintenance of UST systems by trained personnel.
- (2) **DEM's UST Regulations, Rule 8.05** – requiring corrosion protection for steel tanks and piping.
- (3) **DEM' UST Regulations, Rule 8.11** – requiring annual testing of line leak detectors by qualified persons.
- (4) **DEM's UST Regulations, Rule 8.15(E)** – requiring monthly inspection of the CMS by the owner/operator.
- (5) **DEM's UST Regulations, Rule 8.22(A)** – requiring UST facility owners/operators to have ICC-certified Class A and B UST facility operators assigned to their facilities, that the DEM be notified of any status changes for Class A and B operators and that training logs for Class C UST facility operators be updated as necessary.
- (6) **DEM's UST Regulations, Rule 8.22(F)** – requiring the registered Class A or B UST facility operator to perform monthly on-site UST facility inspections and to document those inspections on the requisite form.

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 remedial actions **within 60 days of receipt of the NOV**:

- (1) Repair or modify the plastic secondary piping for the land dispenser to ensure that the steel primary pipe is protected against corrosion, as per Rules 8.02 and 8.05 of the DEM's UST Regulations. Written or photographic verification of compliance shall be submitted to the DEM's Office of Compliance & Inspection ("OC&I").
- (2) If available, submit to the OC&I written verification that the line leak detector for the UST was tested by a qualified person during the year 2014.
- (3) Assign at least one trained and ICC-certified Class A UST facility operator and at least one trained and ICC-certified Class B UST facility operator to the Facility in accordance with Rule 8.22 of the DEM's UST Regulations. Written verification of compliance shall be submitted to the OC&I.

- (4) Review and update the training log for the Class C UST facility operators that have been trained and assigned to the Facility, as per Rules 8.22 (A) and (D) of the DEM's UST Regulations. A copy of the completed and updated training log shall be submitted to the OC&I. The Facility shall henceforth be operated only with at least one trained Class C UST facility operator on duty during all hours of operation, as per Rule 8.22 of the DEM's UST Regulations.
- (5) Submit an updated and completed Certified UST Facility Operators Registration Form to the DEM – Office of Waste Management in accordance with Rule 8.22(A)(4) of the DEM's UST Regulations and copies of the Class A and Class B UST facility operators' examination certificates along with the registration form. Copies of the forms and certificates shall also be submitted to the OC&I.
- (6) If available, submit copies of the completed Class A/B UST Facility Operators Monthly Inspection Checklists for the time period of April 2014 through March 2016 to the OC&I. If such records are not available, the newly assigned and registered Class A/B UST facility operator(s) shall henceforth perform these inspections in accordance with Rules 8.22(F) and 8.15(E) of the DEM's UST Regulations and document the results of those inspections on the requisite form (copy enclosed). Written verification of a return to compliance shall be submitted to the OC&I.

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:

\$8,750

- (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, RI 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 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 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
One Capitol Hill, 4TH 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 Rule 7.00(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:

Tricia Quest, Esquire
DEM - Office of Legal Services
235 Promenade Street, Suite 425
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 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 (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 city of Warwick, 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 42-17.1-2 (31), 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) Tricia Quest at 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:

Greenwich Bay Enterprises, Inc.
c/o Mark A. McSally, Esq., Registered Agent
1041 Ten Rod Road, Suite B
North Kingstown, RI 02852

by Certified Mail.



ADMINISTRATIVE PENALTY SUMMARY	
Program:	OFFICE OF COMPLIANCE AND INSPECTION, UST COMPLIANCE
File No.:	UST 2016-20-00649
Respondent:	Greenwich Bay Enterprises, 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(3) – Failure to Test Line Leak Detector	Type II (\$12,500 Max. Penalty)*	Minor	\$1,250	1 violation	\$1,250
D(5) – Failure to Assign Class A/B Operators to the Facility	Type II (\$12,500 Max. Penalty)*	Moderate	\$5,000	1 violation	\$5,000
D(4) and D(6) – Failure to Have Class A/B Operator Perform Monthly Inspections	Type II (\$12,500 Max. Penalty)*	Minor	\$2,500	1 violation	\$2,500
SUB-TOTAL					\$8,750

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

ECONOMIC BENEFIT FROM NON-COMPLIANCE
<p>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:</p> <ul style="list-style-type: none"> - THERE IS NO IDENTIFIABLE BENEFIT FROM NON-COMPLIANCE; OR - THE AMOUNT OF ECONOMIC BENEFIT CANNOT BE QUANTIFIED.
<p>A review of the record in this matter has revealed that Respondent has either enjoyed no identifiable benefit from the non-compliance alleged in this enforcement action or that the amount of economic benefit that may have resulted cannot be quantified.</p>

COST RECOVERY
<p>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.</p>
<p>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.</p>

TOTAL PENALTY PROPOSED UNDER PENALTY REGULATIONS = \$8,750

PENALTY MATRIX WORKSHEET

CITATION:	Failure to Test Line Leak Detector
VIOLATION NO.:	D (3)

TYPE		
<u> </u> TYPE I <u>DIRECTLY</u> related to protecting health, safety, welfare or environment.	<u> X </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 PARTICULAR VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.

FACTORS CONSIDERED:

Taken from Section 10 (a) (2) of the DEM's *Rules and Regulations for Assessment of Administrative Penalties*

- (A) **The extent to which the act or failure to act was out of compliance:** Respondent failed to test the line leak detector in accordance with the DEM's UST Regulations. Periodic inspection and testing of leak detection equipment is of significant importance to the regulatory program. These tests verify whether the devices are functioning in accordance with the manufacturer's specifications. Failure to comply would presumably reduce the likelihood of detecting and preventing releases from USTs.
- (B) **Environmental conditions:** The Facility is located in a developed area with potential vapor receptors including commercial structures and underground utilities. The Facility is located in a GB groundwater classification zone, which are groundwater resources presumed to be unsuitable for drinking water use without treatment. There are no known drinking water supply wells proximate to the Facility. The UST is located within 100 feet of the Warwick Cove estuary and gasoline is piped under pressure beneath docks installed in the cove. The Facility is located in the Greenwich Bay watershed.
- (C) **Amount of the pollutant:** Considered, but not utilized for this calculation.
- (D) **Toxicity or nature of the pollutant:** The volatile nature of gasoline presents both a potential public health hazard (due to potential inhalation of benzene) and a potential public safety hazard (due to the potential for explosion). Gasoline is capable of causing significant soil and groundwater contamination if released to the environment and it is toxic to marine organisms.
- (E) **Duration of the violation:** 1 year – 2014.
- (F) **Areal extent of the violation:** Considered, but not utilized for this calculation.

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- (G) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent failed to prevent the non-compliance by having the line leak detector tested in 2014. Respondent had the line leak detector tested during 2015 and 2016 and it was reported that the detector met the criteria for passing.
- (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:** Respondent was previously cited by the DEM for this same violation in a Letter of Non-Compliance dated 12 May 2011.
- (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 Rule 8.11 of the DEM's UST Regulations. As owner and operator of the Facility, Respondent had full control over the occurrence of the violation. The leak detection equipment testing requirements are clearly established in the DEM's UST Regulations.
- (J) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized for 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	\$1,250 to \$2,500 \$1,250	\$250 to \$1,250

PENALTY MATRIX WORKSHEET

CITATION: Failure to Assign Class A/B Operators to the Facility

VIOLATION NO.: D (5)

TYPE

 TYPE I
DIRECTLY related to protecting health, safety, welfare or environment.

 X **TYPE II**
INDIRECTLY related to protecting health, safety, welfare or environment.

 TYPE III
INCIDENTAL to protecting health, safety, welfare or environment.

DEVIATION FROM THE STANDARD

THE DEGREE TO WHICH A PARTICULAR VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.

FACTORS CONSIDERED:

Taken from Section 10 (a) (2) of the DEM's *Rules and Regulations for Assessment of Administrative Penalties*

- (A) **The extent to which the act or failure to act was out of compliance:** The registered Class A/B UST facility operator ceased acting in those roles in or about June 2014 and the facility has been operated since that time without ICC-certified Class A/B UST facility operators. The DEM's UST Regulations expressly require all owners/operators of regulated UST facilities to have trained and ICC-certified Class A/B UST facility operators assigned to their facilities.
- (B) **Environmental conditions:** The Facility is located in a developed area with potential vapor receptors including commercial structures and underground utilities. The Facility is located in a GB groundwater classification zone, which are groundwater resources presumed to be unsuitable for drinking water use without treatment. There are no known drinking water supply wells proximate to the Facility. The UST is located within 100 feet of the Warwick Cove estuary and gasoline is piped under pressure beneath docks installed in the cove. The Facility is located in the Greenwich Bay watershed.
- (C) **Amount of the pollutant:** Considered, but not utilized for this calculation.
- (D) **Toxicity or nature of the pollutant:** The volatile nature of gasoline presents both a potential public health hazard (due to potential inhalation of benzene) and a potential public safety hazard (due to the potential for explosion). Gasoline is capable of causing significant soil and groundwater contamination if released to the environment and it is toxic to marine organisms.
- (E) **Duration of the violation:** Approximately 2½ years - June 2014 to the present.
- (F) **Areal extent of the violation:** Considered, but not utilized for this calculation.

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- (G) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent failed to prevent the non-compliance by assigning ICC-certified Class A/B UST facility operators to the Facility immediately after the previously registered operator ceased acting in those roles. Respondent has yet to mitigate the non-compliance despite receiving a Notice of Intent to Enforce from the DEM, which required that it do so.
- (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:** Negligence is attributable to Respondent for the failure to comply immediately with all of the requirements set forth in Rule 8.22 of the DEM's UST Regulations. As owner and operator of the Facility, Respondent had full control over the occurrence of the violation. The UST facility operator training requirements are clearly established in the DEM's UST Regulations.
- (J) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized for this calculation.

MAJOR	<u> X </u> 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	\$2,500 to \$6,250
	MODERATE	\$6,250 to \$12,500	\$2,500 to \$6,250 \$5,000	\$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 Have Class A/B Operator Perform Monthly Inspections
VIOLATION NOS.:	D (4) and (6)

TYPE		
<u> </u> TYPE I <u>DIRECTLY</u> related to protecting health, safety, welfare or environment.	<u> X </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 PARTICULAR VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.

FACTORS CONSIDERED:

Taken from Section 10 (a) (2) of the DEM's *Rules and Regulations for Assessment of Administrative Penalties*

- (A) **The extent to which the act or failure to act was out of compliance:** Respondent failed to have an ICC-certified Class A/B UST facility operator inspect the facility on a monthly basis and document the inspections on the requisite form. These inspections are expressly required by the DEM's UST Regulations and are of significant importance to the regulatory program. Failure to comply would presumably reduce the likelihood of preventing or detecting releases from the USTs.
- (B) **Environmental conditions:** The Facility is located in a developed area with potential vapor receptors including commercial structures and underground utilities. The Facility is located in a GB groundwater classification zone, which are groundwater resources presumed to be unsuitable for drinking water use without treatment. There are no known drinking water supply wells proximate to the Facility. The UST is located within 100 feet of the Warwick Cove estuary and gasoline is piped under pressure beneath docks installed in the cove. The Facility is located in the Greenwich Bay watershed.
- (C) **Amount of the pollutant:** Considered, but not utilized for this calculation.
- (D) **Toxicity or nature of the pollutant:** The volatile nature of gasoline presents both a potential public health hazard (due to potential inhalation of benzene) and a potential public safety hazard (due to the potential for explosion). Gasoline and diesel fuel are capable of causing significant soil and groundwater contamination if released to the environment.
- (E) **Duration of the violation:** Approximately 2½ years - June 2014 to the present.
- (F) **Areal extent of the violation:** Considered, but not utilized for this calculation.

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- (G) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent failed to prevent the non-compliance by assigning ICC-certified Class A/B UST facility operators to the Facility and have them perform the monthly inspections immediately. Respondent has yet to mitigate the non-compliance despite receiving a Notice of Intent to Enforce from the DEM, which required that it do so.
- (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:** Negligence is attributable to Respondent for the failure to comply immediately with the requirements set forth in Rules 8.22(F) and 8.15(E) of the DEM's UST Regulations. As owner and operator of the Facility, Respondent had full control over the occurrence of the violation. The Class A/B UST facility operator monthly inspection requirements are clearly established in the DEM's UST Regulations.
- (J) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized for 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	\$1,250 to \$2,500 \$2,500	\$250 to \$1,250