

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF COMPLIANCE & INSPECTION**

**IN RE: Tuckahoe Land Company, L.P.  
Benjamin Tucker Hodgson**

**FILE NO.: FW C08-019**

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 DEM’s jurisdiction.

B. Administrative History

DEM staff within the Office of Compliance and Inspection and the Division of Agriculture met with the Respondents and the U.S. Department of Agriculture Natural Resource Conservation Service (“NRCS”) on June 25, 2010 and March 14, 2011 to discuss the violations and how to resolve the violations in a way that would benefit the wetland habitat and the Respondents’ agricultural operation. To date, no restoration plan has been submitted to DEM.

C. Facts

- (1) The subject property is located approximately 1,000 feet west of Slocum Road, with a gravel drive entrance situated at utility pole number 27/84 (Slocum Road), approximately 500 feet directly west of house 383 (Slocum Road), approximately 900 feet northwest of the intersection of Slocum Road and Glen Hill Drive, approximately 75 feet east of the Amtrak rail lines, and immediately north and south of existing turf grass fields, Assessor’s Plat 78, Lots 4-12, 4-15, and 4-16 in the town of Exeter, Rhode Island (the “Property”).
- (2) The Respondents own the Property.
- (3) DEM inspected the Property on April 1, 2009, July 20, 2009, September 24, 2009, and June 21, 2010. The inspections revealed the following unauthorized alterations of freshwater wetlands:
  - (a) Clearing, excavating, filling (in the form of excavated dredge material), grading, and creating soil disturbance within a Marsh/Swamp wetland complex, portions of which are also within 100-foot Riverbank Wetland. These activities have resulted in the unauthorized alteration of approximately 262,500 square feet (approximately 6.0 acres) of

freshwater wetland.

- (b) Clearing, excavating, filling (in the form of excavated dredge material and a surface water control structure), grading, and creating soil disturbance within a River, diverting and otherwise entirely altering the River. These activities have resulted in the unauthorized alteration of approximately 8,680 square feet (1,085 linear feet) of freshwater wetland.
  - (c) Clearing, excavating, filling (in the form of excavated dredge material), grading, and creating soil disturbance within a Stream, diverting and otherwise altering the Stream. These activities have resulted in the unauthorized alteration of approximately 2,160 square feet (540 linear feet) of freshwater wetland.
  - (d) Clearing, filling (in the form of soil material and excavated dredge material), grading, and creating soil disturbance within 50-foot Perimeter Wetland, portions of which are also 100-foot Riverbank Wetland. These activities have resulted in the unauthorized alteration of approximately 52,500 square feet (approximately 1.21 acres) of freshwater wetland.
- (4) The Respondents did not receive approval from the DEM to alter freshwater wetlands on the Property in the areas specified above.

#### 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 2-1-21** – prohibiting activities which may alter freshwater wetlands without a permit from the DEM.
- (2) **DEM's Rules and Regulations Governing the Administration and Enforcement of the Freshwater Wetlands Act, Rule 5.01** – prohibiting activities which may alter freshwater wetlands without a permit from the DEM.

#### 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:

- (1) Cease and desist **IMMEDIATELY** from any further alteration of the above described freshwater wetlands, and
- (2) Restore all freshwater wetlands in accordance with the requirements set forth below:

- (a) Install a continuous uninterrupted line of staked haybales or silt fence between those portions of the wetlands that have been altered without authorization and the undisturbed freshwater wetlands. These soil erosion and sediment controls must be regularly inspected and properly and continually maintained (and replaced, if necessary) during and following the completion of the required wetland restoration, and until such time that all surrounding areas are properly stabilized. At the discretion and direction of representatives of DEM, additional soil erosion and sediment controls must be installed on-site, as deemed necessary, to protect any and all freshwater wetlands.
  - (b) Repair the failed dam structure at the western end of the Marsh/Swamp wetland complex. The repair must be approved by DEM in accordance with a plan submitted to DEM.
  - (c) Remove all Phragmites plants (as best as possible) from the excavated and stockpiled spoils that have been placed within the Swamp/Marsh wetland complex and/or obtain plantable high-organic replacement soils to return to the excavated area. Spread the clean spoils and/or high-organic soils throughout the eastern two-thirds of the altered wetland in such a way to recreate a meandering watercourse through the spread soil material. The details of the final restoration must be approved by DEM.
  - (d) All disturbed surfaces within the Perimeter Wetland and Riverbank Wetlands (whichever extends the furthest) must be covered with plantable soil/loam (if necessary), seeded with a wildlife conservation grass seed mixture, and stabilized with a mat of loose hay mulch.
  - (e) All disturbed surfaces within the Marsh/Swamp wetland complex and all watercourses must be seeded with a wetland conservation grass seed mixture and stabilized with a mat of loose hay mulch.
  - (f) Upon stabilization of all disturbed areas, erosion and sedimentation controls must be removed from the freshwater wetlands. Prior to the removal of the controls, all accumulated sediment must be removed to a suitable upland area, outside of any and all freshwater wetlands.
  - (g) All restored freshwater wetland areas must be allowed to revert to a natural wild condition. No future excavation, clearing, construction, cutting, trimming, or other alterations are authorized in any wetland area on the subject property without first obtaining a permit from the DEM.
  - (h) The above restoration work must be completed prior to **November 15, 2011**.
- (3) Contact Mr. Bruce Ahern of DEM (401) 222-4700 ext. 7703 to finalize the details of the restoration required above. No restoration work shall commence until all details have been finalized.

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:

**Thirty-Five Thousand Dollars (\$35,000.00)**

- (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 (20) days of your NOV. Payment shall be in the form of a certified 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 the respondents 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.

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 (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, 2<sup>nd</sup> 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 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:

Richard M. Bianculli Jr., Esquire  
DEM - Office of Legal Services  
235 Promenade Street, 4<sup>TH</sup> 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) An original signed copy of this NOV is being forwarded to the town of Exeter to be recorded in the Land Evidence Records pursuant to R.I. Gen. Laws Chapter 34-13 and 2-1-24, as amended.
- (7) 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) Richard M. Bianculli Jr. at the DEM Office of Legal Services at (401) 222-6607. All other inquiries should be directed to Mr. Harold Ellis of the DEM Office of Compliance and Inspection at (401) 222-1360 ext. 7401.

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

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

Date: \_\_\_\_\_

CERTIFICATION

I hereby certify that on the \_\_\_\_\_ day of \_\_\_\_\_ 2011  
the within Notice of Violation was forwarded to:

Tuckahoe Land Company, L.P.  
c/o H. Winfield Tucker, Registered Agent  
Indian Corner Road  
P.O. Box 2  
Slocum, RI 02877

Benjamin Tucker Hodgson  
P.O. Box 2  
Slocum, RI 02877

by Certified Mail.

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# ADMINISTRATIVE PENALTY SUMMARY

Program: Office of Compliance and Inspection, Freshwater Wetlands  
 File No.: FW C08-019  
 Respondents: Tuckahoe Land Company, L.P. and Benjamin Tucker Hodgson

<b>GRAVITY OF VIOLATION</b>					
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) and (2) – Alteration of a Marsh/Swamp wetland complex	Type I (\$10,000 Max. Penalty)*	Major	\$10,000	1 violation	\$10,000.00
C(1) and (2) – Alteration of a River	Type I (\$10,000 Max. Penalty)*	Major	\$10,000	1 violation	\$10,000.00
C(1) and (2) – Alteration of a Stream	Type I (\$10,000 Max. Penalty)*	Major	\$10,000	1 violation	\$10,000.00
C(1) and (2) – Alteration of a 50-foot Perimeter Wetland and 100-foot Riverbank Wetlands	Type I (\$10,000 Max. Penalty)*	Major	\$5,000	1 violation	\$5,000.00
<b>SUB-TOTAL</b>					<b>\$35,000.00</b>

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

**TOTAL PENALTY PROPOSED UNDER PENALTY REGULATIONS = \$35,000.00**

# PENALTY MATRIX WORKSHEET

CITATION: Alteration of a Marsh/Swamp wetland complex

VIOLATION NO.: C (1) and (2)

TYPE		
<b><u>X</u> TYPE I</b> <i>DIRECTLY</i> related to protecting health, safety, welfare or environment.	<b>TYPE II</b> <i>INDIRECTLY</i> related to protecting health, safety, welfare or environment.	<b>TYPE III</b> <i>INCIDENTAL</i> 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.		
<b>FACTORS CONSIDERED:</b>		
Taken from Section 10(a)(2) of the DEM Rules and Regulations for Assessment of Administrative Penalties		
(A) <b>The extent to which the act or failure to act is out of compliance:</b> The Respondents cleared, excavated, filled (in the form of excavated dredge material), graded, and created soil disturbance within a Marsh/Swamp wetland complex, portions of which are also within 100-foot Riverbank Wetland. The severity of the alteration to the wetland environment was determined to be of major significance to the regulatory program.		
(B) <b>Environmental conditions:</b> The Marsh/Swamp wetland complex was previously in a natural, wild, vegetated condition.		
(C) <b>Amount of the pollutant:</b> Not relevant		
(D) <b>Toxicity or nature of the pollutant:</b> Not relevant		
(E) <b>The duration of the violation:</b> Unknown. The violation was first observed by DEM on April 1, 2009.		
(F) <b>The areal extent of the violation:</b> The areal extent of the violation is approximately 262,500 ft <sup>2</sup> (approximately 6.0 acres).		
(G) <b>Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:</b> The Respondents failed to apply for a permit from DEM requesting approval to alter the freshwater wetlands. Tuckahoe Land Company admitted that they had not obtained a wetland permit and what started as a replacement for the water control structure got "out of hand".		
(H) <b>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:</b> Not relevant.		
(I) <b>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:</b> The Respondents had complete control over the occurrence of the violation and had an obligation to protect the wetlands. Despite the knowledge that a wetland permit was required, Tuckahoe Land Company altered a major portion of the wetlands.		
(J) <b>Any other factor(s) that may be relevant in determining the amount of a penalty:</b> Not relevant.		
<b>MINOR</b>	<b>MODERATE</b>	<b><u>X</u> MAJOR</b>

Penalty Matrix where the applicable statute provides for a civil penalty up to \$ 10,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	<b>MAJOR</b>	\$5,000 to \$10,000 <b>\$10,000</b>	\$2,500 to \$5,000	\$1,000 to \$2,500
	MODERATE	\$2,500 to \$5,000	\$1,000 to \$2,500	\$500 to \$1,000
	MINOR	\$1,000 to \$2,500	\$500 to \$1,000	\$100 to \$500



# PENALTY MATRIX WORKSHEET

CITATION: Alteration of a River

VIOLATION NO.: C (1) and (2)

<b>TYPE</b>		
<u>X</u> <b>TYPE I</b> <i>DIRECTLY</i> related to protecting health, safety, welfare or environment.	_____ <b>TYPE II</b> <i>INDIRECTLY</i> related to protecting health, safety, welfare or environment.	_____ <b>TYPE III</b> <i>INCIDENTAL</i> to protecting health, safety, welfare or environment.
<b>DEVIATION FROM THE STANDARD</b>		
<small>THE DEGREE TO WHICH A PARTICULAR VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.</small>		
<p><b>FACTORS CONSIDERED:</b> Section 10(a)(2) of the DEM Rules and Regulations for Assessment of Administrative Penalties</p> <p>(A) <b>The extent to which the act or failure to act is out of compliance:</b> The Respondents cleared, excavated, filled (in the form of excavated dredge material and a surface water control structure), graded, and created soil disturbance within a River, diverting and otherwise altering the entire River. The severity of the alteration to the wetland environment was determined to be of major significance to the regulatory program.</p> <p>(B) <b>Environmental conditions:</b> The River was a natural undisturbed watercourse that meandered through the Marsh/Swamp wetland complex. The excavation and filling of the wetland complex completely eliminated the River.</p> <p>(C) <b>Amount of the pollutant:</b> Not relevant</p> <p>(D) <b>Toxicity or nature of the pollutant:</b> Not relevant</p> <p>(E) <b>The duration of the violation:</b> Unknown. The violation was first observed by DEM on April 1, 2009.</p> <p>(F) <b>The areal extent of the violation:</b> The areal extent of the violation is approximately 8,680 square feet (1,085 linear feet of River).</p> <p>(G) <b>Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:</b> The Respondents failed to apply for a permit from DEM requesting approval to alter the freshwater wetlands. Tuckahoe Land Company admitted that they had not obtained a wetland permit and what started as a replacement for the water control structure got "out of hand".</p> <p>(H) <b>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:</b> Not relevant.</p> <p>(I) <b>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:</b> The Respondents had complete control over the occurrence of the violation and had an obligation to protect the wetlands. Despite the knowledge that a wetland permit was required, Tuckahoe Land Company altered a major portion of the wetlands.</p> <p>(J) <b>Any other factor(s) that may be relevant in determining the amount of a penalty:</b> Not relevant.</p>		
<b>MINOR</b>	<b>MODERATE</b>	<u>X</u> <b>MAJOR</b>

Penalty Matrix where the applicable statute provides for a civil penalty up to \$ 10,000		<b>TYPE I</b>	TYPE II	TYPE III
DEVIATION FROM STANDARD	<b>MAJOR</b>	\$5,000 to \$10,000 <b>\$10,000</b>	\$2,500 to \$5,000	\$1,000 to \$2,500
	MODERATE	\$2,500 to \$5,000	\$1,000 to \$2,500	\$500 to \$1,000
	MINOR	\$1,000 to \$2,500	\$500 to \$1,000	\$100 to \$500

# PENALTY MATRIX WORKSHEET

CITATION: Alteration of a Stream

VIOLATION NO.: C (1) and (2)

TYPE		
<u>X</u> TYPE I <i>DIRECTLY</i> related to protecting health, safety, welfare or environment.	TYPE II <i>INDIRECTLY</i> related to protecting health, safety, welfare or environment.	TYPE III <i>INCIDENTAL</i> 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.		
<b>FACTORS CONSIDERED:</b>		
Section 10(a)(2) of the DEM Rules and Regulations for Assessment of Administrative Penalties		
(A) <b>The extent to which the act or failure to act is out of compliance:</b> The Respondents cleared, excavated, filled (in the form of excavated dredge material), graded, and created soil disturbance within a Stream, diverting and otherwise altering the entire Stream. The severity of the alteration to the wetland environment was determined to be of major significance to the regulatory program.		
(B) <b>Environmental conditions:</b> The Stream was a natural undisturbed watercourse that ran through the Marsh/Swamp wetland complex and joined the River. The excavation and filling of the wetland complex completely eliminated the Stream.		
(C) <b>Amount of the pollutant:</b> Not relevant		
(D) <b>Toxicity or nature of the pollutant:</b> Not relevant		
(E) <b>The duration of the violation:</b> Unknown. The violation was first observed by DEM on April 1, 2009.		
(F) <b>The areal extent of the violation:</b> The areal extent of the violation is approximately 2,160 square feet (540 linear feet of Stream).		
(G) <b>Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:</b> The Respondents failed to apply for a permit from DEM requesting approval to alter the freshwater wetlands. Tuckahoe Land Company admitted that they had not obtained a wetland permit and what started as a replacement for the water control structure got "out of hand".		
(H) <b>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:</b> Not relevant.		
(I) <b>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:</b> The Respondents had complete control over the occurrence of the violation and had an obligation to protect the wetlands. Despite the knowledge that a wetland permit was required, Tuckahoe Land Company altered a major portion of the wetlands.		
(J) <b>Any other factor(s) that may be relevant in determining the amount of a penalty:</b> Not relevant.		
MINOR	MODERATE	<u>X</u> MAJOR

Penalty Matrix where the applicable statute provides for a civil penalty up to \$ 10,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	<b>MAJOR</b>	\$5,000 to \$10,000 <b>\$10,000</b>	\$2,500 to \$5,000	\$1,000 to \$2,500
	MODERATE	\$2,500 to \$5,000	\$1,000 to \$2,500	\$500 to \$1,000
	MINOR	\$1,000 to \$2,500	\$500 to \$1,000	\$100 to \$500

# PENALTY MATRIX WORKSHEET

CITATION: Alteration of a 50-foot Perimeter Wetland and 100-foot Riverbank Wetlands  
 VIOLATION NO.: C (1) and (2)

TYPE		
<u>  X  </u> TYPE I <i>DIRECTLY</i> related to protecting health, safety, welfare or environment.	_____ TYPE II <i>INDIRECTLY</i> related to protecting health, safety, welfare or environment.	_____ TYPE III <i>INCIDENTAL</i> 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.		
<b>FACTORS CONSIDERED:</b> Section 10(a)(2) of the DEM Rules and Regulations for Assessment of Administrative Penalties (A) <b>The extent to which the act or failure to act is out of compliance:</b> The Respondents cleared, filled (in the form of soil material and excavated dredge material), graded, and created soil disturbance within 50-foot Perimeter Wetland, portions of which are also 100-foot Riverbank Wetlands. The severity of the alteration to the wetland environment was determined to be of major significance to the regulatory program. (B) <b>Environmental conditions:</b> The Perimeter Wetland and 100-foot Riverbank Wetlands were previously in a natural, wild, vegetated condition. (C) <b>Amount of the pollutant:</b> Not relevant (D) <b>Toxicity or nature of the pollutant:</b> Not relevant (E) <b>The duration of the violation:</b> Unknown. The violation was first observed by DEM on April 1, 2009. (F) <b>The areal extent of the violation:</b> The areal extent of the violation is approximately 52,500 square feet (approximately 1.21 acres). (G) <b>Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:</b> The Respondents failed to apply for a permit from DEM requesting approval to alter the freshwater wetlands. Tuckahoe Land Company admitted that they had not obtained a wetland permit and what started as a replacement for the water control structure got "out of hand". (H) <b>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:</b> Not relevant. (I) <b>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:</b> The Respondents had complete control over the occurrence of the violation and had an obligation to protect the wetlands. Despite the knowledge that a wetland permit was required, Tuckahoe Land Company altered a major portion of the wetlands. (J) <b>Any other factor(s) that may be relevant in determining the amount of a penalty:</b> Not relevant.		
MINOR	MODERATE	<u>  X  </u> MAJOR

Penalty Matrix where the applicable statute provides for a civil penalty up to \$ 10,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	<b>MAJOR</b>	\$5,000 to \$10,000 <b>\$5,000</b>	\$2,500 to \$5,000	\$1,000 to \$2,500
	MODERATE	\$2,500 to \$5,000	\$1,000 to \$2,500	\$500 to \$1,000
	MINOR	\$1,000 to \$2,500	\$500 to \$1,000	\$100 to \$500