



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Coast Regional Water Quality Control Board

October 5, 2012

Certified Mail No. 7008 3230 0000 4723 2168

Ms. Melissa Thorne, Special Counsel
South San Luis Obispo County Sanitation District
621 Capital Mall, 18th Floor
Sacramento, CA 95814

Dear Ms. Thorne:

**ADOPTION OF ADMINISTRATIVE CIVIL LIABILITY ORDER NUMBER R3-2012-0041
FOR THE SOUTH SAN LUIS OBISPO COUNTY SANITATION DISTRICT, SAN LUIS
OBISPO COUNTY**

Enclosed is a signed copy of Administrative Civil Liability Order No. R3-2012-0041 adopted by the Central Coast Regional Water Quality Control Board (Central Coast Water Board) at their October 3, 2012, Board meeting.

Central Coast Water Board staff also posted a copy of the Order on our Website for other interested parties to view and print. The Order is available at the following:

http://www.waterboards.ca.gov/centralcoast/board_decisions/adopted_orders/

If you have any questions or comments concerning the Order, please contact **Ryan Lodge (805) 549-3506**, or by email at **rlodge@waterboards.ca.gov**, or John Robertson at (805) 542-4630.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth A. Harris Jr.".

Kenneth A. Harris Jr.
Interim Acting Executive Officer

Attachment: Order No. R3-2012-0041

cc: See next page.

cc (without attachment): via email only

Mr. Michael Seitz
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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401**

ORDER NO. R3-2012-0041

**ADMINISTRATIVE CIVIL LIABILITY
IN THE MATTER OF THE
SOUTH SAN LUIS OBISPO COUNTY SANITATION DISTRICT
SAN LUIS OBISPO COUNTY**

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board), having held a public hearing on September 7, 2012, and on October 3, 2012, to receive evidence and comments on the allegations contained in Administrative Civil Liability Complaint No. R3-2012-0030, dated June 19, 2012, having considered all the evidence and public comment received, and on the Prosecution's recommendation for administrative assessment of Civil Liability in the amount of \$1,388,707.50, however finds that an assessed penalty of \$1,109,812.80 is applicable as follows:

1. The Discharger's wastewater treatment facility, located adjacent to the Oceano County Airport and the Pacific Ocean in Oceano, California is subject to Waste Discharge Requirements Order No. R3-2009-0046, NPDES Permit No. CA0048003, adopted on October 23, 2009, by the Central Coast Water Board and the State Water Resources Control Board Order (State Water Board) No. 2006-0003-DWQ, "Statewide General Waste Discharge Requirements for Sanitary Sewer Systems."
2. On December 19, 2010, the Discharger's WWTP influent pump station automatically shut down after floodwater entered an electrical conduit leading into a pump motor control system in the WWTP influent pump station. The penetrating floodwater shorted a critical motor control component (shunt switch) which then resulted in tripping a large main circuit breaker that supplied power to all four influent pumps located in the pump station.
3. The resulting loss of power to all four influent pumps caused untreated sewage to surcharge upstream into the Discharger's collection system and overflow, discharging untreated sewage from the collection system into the environment. Additionally, the Discharger documented and certified six sewer backups where untreated sewage was discharged inside six residential homes through private sewer service lateral connections. The total discharge of sewage between December 19th and 20th is estimated at 674,400 gallons (December 2010 Sewer Overflow).

4. In response to the December 2010 Sewer Overflow, the Discharger submitted a spill report to the Central Coast Water Board on January 3, 2011. On March 7-8, 2011, State Water Board staff inspected the Discharger's WWTP and collection system facilities.
5. On April 18, 2011, the Central Coast Water Board issued a Notice of Violation and a 13267 Letter requiring the Discharger to submit a technical report concerning the December 19, 2010, discharge of untreated sewage from its collection system. In response, the Discharger submitted a technical report dated May 31, 2011, detailing the nature, circumstances, extent and gravity of the unauthorized discharge of untreated sewage.
6. The Discharger is required to properly maintain, operate and manage its sanitary sewer collection system in compliance with the Regional Water Board Order No. R3-2009-0046, NPDES Permit No. CA0048003 and the Sanitary Sewer Collection System Order, and is required by the Sanitary Sewer Collection System Order to provide adequate capacity to convey base flows and peaks flows, including flows related to wet weather.
7. The discharge of untreated sewage to waters of the United States is a violation of the requirements in R3-2009-0046, section 301 of the Clean Water Act, CWC section 13376, and the Sanitary Sewer Collection System Order. Violations of these requirements are the basis for assessing administrative civil liability pursuant to Water Code section 13385.
8. The events leading to the December 19, 2010, headworks failure and sanitary sewer overflow were not upset events. An upset is defined in 40 CFR Section 122.41(n) and in the Discharger's Waste Discharge Requirements Order No. R3-2009-0046, NPDES Permit No. CA0048003, Attachment D, Standard Provision H, as an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

The December 2010 Sewer Overflow violations were not violations of technology based effluent limitations. The violations were based on the discharge of untreated sewage from the Discharger's collection system.

The Discharger failed to protect the treatment plant from inundation from a 100-year frequency flood as required by Order No. R3-2009-0046, NPDES Permit No. CA0048003. The Discharger acknowledged¹ that the storm event was not a 100-

¹ Hearing transcript page 516.

year event. The key factor that caused the sewer overflow was the lack of protection from the storm event, a factor within the control of the Discharger.

The Discharger failed to properly maintain the emergency pump by keeping the effluent valve closed. The operator's inability to fully open the effluent valve caused sewage to backup into the collection system and eventually overflow. The District had the ability to keep the valve open at all times and had done so for years², but changed its standard operating procedures advising staff to keep the valve closed³.

9. The December 2010 Sewer Overflow Event was not a bypass as defined in 40 CFR Section 122.41(m) and in the Discharger's Waste Discharge Requirements Order No. R3-2009-0046, NPDES Permit No. CA0048003. A bypass is an intentional diversion of waste streams from any portion of a treatment facility. The Discharger did not intentionally divert waste streams around treatment systems. The Discharger experienced a sanitary sewer overflow caused by failure of influent pumps and failure of the emergency backup system to pump influent flows.

MAXIMUM CIVIL PENALTY

10. California Water Code Section 13385 authorizes the Central Coast Water Board to administratively impose civil liability in an amount not to exceed \$10,000 for each day in which any person violates an NPDES permit. Where there is a discharge, section 13385 authorizes the Central Coast Water Board to administratively impose additional liability of ten dollars per gallon. The maximum liability in this case is \$6,754,000.

PENALTY METHODOLOGY

11. Pursuant to California Water Code Section 13385(e), the Central Coast Water Board must consider the following factors in determining the amount of liability for the violations:
 - Nature, circumstances, extent, and gravity of the violations,
 - Whether the discharge is susceptible to cleanup or abatement,
 - Degree of toxicity of the discharge,
 - Discharger's ability to pay,
 - Effect on the Discharger's ability to continue in business,
 - Voluntary cleanup efforts undertaken by the Discharger,
 - Discharger's prior history of violations,
 - Discharger's degree of culpability,
 - Economic benefit or savings, if any, resulting from the violation, and

² See Hearing transcript page 296.

³ Exhibit 99.

- Other matters that justice may require.

12. On November 17, 2009, the State Water Board adopted Resolution No. 2009-0083 amending the Water Quality Enforcement Policy (Enforcement Policy). The Enforcement Policy was approved by the Office of Administrative Law and became effective on May 20, 2010. The Enforcement Policy establishes a methodology for assessing administrative civil liability. Use of the methodology addresses the factors in Water Code section 13327 and section 13385, subdivision (e). The staff report entitled *Technical Report for Noncompliance with Central Coast RWQCB Order No. R3-2009-0046 and State Water Resources Control Board Order No. 2006-0003-DWQ, "Statewide General Waste Discharge Requirements for Sanitary Sewer Systems", Unauthorized SSO occurring on December 19-20, 2010*, dated June 2012, is included in Attachment 3 of the Staff Report and incorporated herein, and analyzes the violations under the Enforcement Policy's penalty calculation methodology. This methodology is set forth in detail below:

1. Step 1 – Potential for Harm for Discharge Violations

a. Factor 1: Harm or Potential for Harm to Beneficial Uses (5)

This score evaluates direct or indirect harm or potential for harm from the violation. The estimated discharge of 674,400 gallons of untreated sewage entered the Oceano Lagoon, Meadow Creek, Arroyo Grande Creek Estuary, and the Pacific Ocean. In addition, the sewage entered at least six private residences and potentially caused human health risks. San Luis Obispo County posted signs warning the public of the sewage spill and rain advisory on all main beach entrances and on all advisory boards for nine days. The REC-1 and REC-2 beneficial uses of the beaches were restricted for more than five days. Therefore, there was a high threat to beneficial uses and a score of 5 or "major" is appropriate.

b. Factor 2: Physical Chemical, Biological or Thermal Characteristics of the Discharge (4)

Raw sewage contains microbial pathogens known to be harmful public health including, but not limited to, the following:

- **Bacteria:** campylobacter, E. coli, vibrio cholera, salmonella, S.typhi, shigella, yersinia
- **Parasites:** cryptosporidium, entamoeba, giardia
- **Viruses:** adenovirus, astrovirus, noravirus, echovirus, enterovirus, reovirus, rotavirus

Raw sewage can cause illness including abdominal cramps, vomiting, diarrhea, high fever, and dehydration. Additionally, it can cause disease such as

gastroenteritis, salmonellosis, typhoid fever, pneumonia, shigellosis, cholera, bronchitis, hepatitis, aseptic meningitis, cryptosporidium, amoebic dysentery, giardiasis, and even death.

Raw sewage can also cause environmental impacts such as a loss of recreation and can be detrimental to aquatic life support, can result in organic enrichment, and can also result in exposure to floatable inorganic objects (e.g. condoms, tampons, medical items (syringes)).

The degree of toxicity in untreated sewage poses a significant threat to human and ecological receptors. Accordingly, a score of 4 is appropriate.

c. Factor 3: Susceptibility to Cleanup and Abatement (1)

Less than 50% of the discharge was susceptible to cleanup or abatement due to the rising floodwaters and multiple discharge points which made cleanup or recovery impossible. Therefore a score of 1 is assigned.

Based on the above determinations, the **Potential for Harm final score** for the violations is [10]

$$(5) + (4) + (1) = 10$$

= *Potential for Harm*

2. Step 2 – Assessment for Discharge Violations

Water Code section 13385, subdivision (c) states that civil liability may be imposed administratively by a regional board pursuant to Article 2.5 of Chapter 5 in an amount not to exceed the sum of ten thousand dollars (\$10,000) for each day in which the violation occurs and \$10 for each gallon discharged but not cleaned up that exceeds 1,000 gallons.

Per Gallon Assessment

Four overflow estimates were presented at the September 7, 2012, hearing including one from the Prosecution team (1,139,825 gallons) and three from the Discharger (Discharger's 417,298 gallons, RMC 674,400 gallons, Appleton 2,250,000 – 3,000,000 gallons.) The RMC estimate⁴ is the most credible estimate. RMC was hired by the Discharger to evaluate the Prosecution's flow estimate and to provide an overflow estimate. RMC utilized wet weather hydrographs to model the flow rates for the overflow event. The Board recognizes that the RMC estimate may include inaccuracies, including failure to account for potential floodwater influent and

⁴ Exhibit 32-9.

inflow, and relying on potentially inaccurate Discharger calculations⁵ for overflows occurring after 6:00 pm on December 19, 2010. However, the RMC estimate utilized a detailed hydraulic analysis developed by engineer with over 30 years of sewer collection system experience utilizing flow data from similar wet weather events. The RMC estimate is consistent with a Discharger estimate of 661,000 gallons provided in the Discharger's Technical Report⁶ using a similar method as RMC. The Board finds that the most accurate estimated overflow volume from the December 2010 Sewer Overflow is 674,400 gallons.

To calculate the initial liability amount on a per gallon basis, a **Per Gallon Factor** is determined from Table 1 of the Enforcement Policy (page 14) by using the **Potential for Harm score** (step 1) and the extent of **Deviation from Requirement** (minor, moderate, or major) of the violation. The Per Gallon Factor is then multiplied by the number of gallons subject to administrative civil liability multiplied by the maximum per gallon liability amount.

a. Deviation from Requirement (moderate)

Prohibition C.1 of Order No. 2006-0003-DWQ states that, "[a]ny SSO that results in a discharge of untreated or partially treated wastewater to waters of the United States is prohibited." While the Discharger demonstrated a general intent to comply with the discharge requirements, the Discharge knew of the risk of flooding and the issue of the underground utility boxes containing electrical cables. The Discharger did not implement the proposed improvement project that would have prevented the December 2010 Sewer Overflow, and thus partially compromised the above prohibition in their permit. Therefore the score of "moderate" is appropriate.

b. Per Gallon Factor (.6)

Using a Potential for Harm score of "10" and a "Moderate" Deviation from Requirement, a Per Gallon Factor of 0.6 is selected from Table 1 of the Enforcement Policy.

c. Maximum / Adjusted Maximum per gallon liability amount (\$2.00/gal)

The maximum per gallon liability amount allowed under Water Code section 13385, subdivision (c) is \$10 for each gallon discharged to waters of the United States but not cleaned up that exceeds 1,000 gallons. The Enforcement Policy recommends a maximum per gallon penalty amount of \$2.00 per gallon for high volume sewage spill and storm-water discharges.

⁵ Exhibit 105, page 8.

⁶ Exhibit 6-118.

The Enforcement Policy also states, however, “[w]here reducing these maximum amounts results in an inappropriately small penalty, such as dry weather discharges or small volume discharges that impact beneficial uses, a higher amount, up to the maximum per gallon amount, may be used.”

A \$2.00 per gallon maximum for this sewage spill resulted in an appropriate penalty. Therefore, a \$2.00 adjusted per gallon liability amount is used.

Using the information above, the **Initial Liability assessed per gallon is calculated to be \$809,280.**

(Per Gallon Factor) x (Gallons subject to liability) x (Maximum per gallon liability amount)

= Initial Liability

= (.6) x (674,400) x (2.00 / gallons) = \$809,280 *Initial Liability (Per Gallon Assessment)*

Per Day Assessment

To calculate the initial liability amount on a per day basis, a **Per Day Factor** is determined from Table 2 of the Enforcement Policy (page 15) by using the **Potential for Harm score** (step 1) and the extent of **Deviation from Requirements** (minor, moderate, or major) of the violation.

a. Deviation from Requirement (10)

The deviation from requirement is (Moderate).

b. Per Day Factor (.6)

A Per Day Factor of (0.6) is selected from Table 2 of the Enforcement Policy.

Using the information above, the **Initial Liability assessed per day is calculated to be \$10,000:**

(Per Day Factor) x (Days subject to liability) x (Maximum per day liability amount)

= (.6) x (2 days) x (\$10,000 / day)

= \$12,000 *Initial Liability (Per Day Assessment)*

3. Step 3 – Per Day Assessments for Non-Discharge Violations

Not applicable.

4. Step 4 – Adjustment Factors

Staff considered certain Conduct Factors to calculate adjustments to the amount of the Initial Amount of the Administrative Civil Liability as follows:

a. Culpability (1.4)

The Enforcement Policy suggests an adjustment multiplier between 0.5 and 1.5 depending on whether the discharge was a result of an accident or the discharger's intentional/negligent behavior. The Discharger failed to provide adequate protection of its equipment from 100-year frequency floods as required under its Permit. The Discharger also failed to ensure implementation of proper standard operating procedures when the Discharger failed to ensure that the emergency bypass pump valve remained in the "open" position during standby mode. The Discharger failed to comply with the Sanitary Sewer Collection System Order to provide adequate sampling to determine the nature and impact of the release. The Discharger had prior knowledge of the potential risks associated with the electrical wires⁷ and the failure to protect plant equipment from 100-year frequency flood⁸ as required by its discharge permit. The Discharger failed to provide redundant pumping capabilities by having all four influent pumps connected to a single shunt trip. A single point of failure, the shunt trip, caused all four influent pumps to fail. The Discharger failed to provide a reliable emergency pump that could operate without repeatedly shutting down. The emergency pump had operational problems noted before the overflow event. Prior to the overflow event, treatment plant staff recommended sending the pump back to the manufacturer⁹. Therefore, this factor should be adjusted to a higher multiplier of 1.4 for negligent behavior.

b. Cleanup and Cooperation (1)

The Discharger responded quickly by diverting flows to the plant and secured additional pumps from other agencies and informed the public regarding the sewage spill. The Discharger also timely responded to the NOV and 13267 letter. Therefore, a multiplier of 1.0 is appropriate.

c. History of Violations (.9)

The Discharger had no history of sewage overflow violations in recent years. Therefore, a factor of .9 is appropriate.

⁷ Exhibit 2, Exhibit 71.

⁸ Hearing transcript page 516.

⁹ Hearing transcript page 286.

The initial base liability per gallon and initial base liability per day are multiplied by the above factors to determine **Revised Liability amount of \$1,019,692.80.**

Revised Per Gallon Assessment

(Initial Liability) x (Culpability) x (Cleanup and Cooperation) x (History of Violations)

= \$\$\$\$ *Revised Liability Per Gallon Assessment*

$(809,280) \times (1.4) \times (1) \times (.9) = \$1,019,692.80$

Revised Per Day Assessment (Discharge Violations)

Discharge Violations:

(Initial Liability) x (Culpability) x (Cleanup and Cooperation) x (History of Violations)

= \$\$\$\$ *Revised Liability Day Assessment*

$(12,000) \times (1.4) \times (1) \times (.9) = \$15,120$

5. Step 5 - Determination of Total Base Liability Amount

The Total Base Liability amount is determined by adding the revised liability amounts per gallon and per day. The **Total Base Liability is \$1,034,812.80.**

(Revised Liability Per Gallon Assessment) + (Revised Liability Per Day Assessment for Discharge Violations) + (Revised Liability Per Day Assessment for Non-Discharge Violations)

$\$1,019,692.80 + \$15,120 = \$1,034,812.80$

6. Step 6 – Ability to Pay and Ability to Continue in Business

If there is sufficient financial information to assess the violator's ability to pay the Total Base Liability Amount or to assess the effect of the Total Base Liability Amount on the violator's ability to continue in business, the Total Base Liability Amount may be adjusted to address the ability to pay or to continue in business.

Sufficient evidence was presented that the Discharger could pay the proposed penalty¹⁰. The Discharger failed to demonstrate it does not have an ability to pay the recommended penalty. Accordingly, the Total Base Liability Amount was not adjusted.

7. Step 7 – Other Factors as Justice May Require

If the amount determined using the above factors is inappropriate, the amount may be adjusted under the provision for “other factors as justice may require,” but only if express findings are made to justify this. In addition, the costs of investigation and enforcement are “other factors as justice may require,” and should be added to the liability amount.

Staff costs incurred by the Central Coast Regional and State Water Resources Control Board are \$75,000 and are added to the Total Base Liability Amount, bringing the liability adjusted Total Base Liability Amount to **\$1,109,812**.

$(\text{Total Base Liability}) + (\text{Staff Costs}) = \text{adjusted Total Base Liability}$

$\$1,034,812.80 + \$75,000 = \$1,109,812.80$

8. Step 8 – Economic Benefit

The Economic Benefit Amount is any savings or monetary gain derived from the act or omission that constitutes the violation. The Enforcement Policy states that the adjusted Total Base Liability Amount shall be at least 10 percent higher than the Economic Benefit Amount so that liabilities are not construed as the cost of doing business and that the assessed liability provides a meaningful deterrent to future violations.

The primary economic benefit for the Discharger was the delay of upgrading its electrical wiring system and protecting in-ground utility boxes from potential floodwaters as planned in 2004 for a total budget cost of \$200,000. The economic benefit gained from this project delay is calculated at \$177,209 based on US EPA's BEN model to calculate economic benefits for noncompliance with regulations.

9. Step 9 – Maximum and Minimum Liability Amounts

The **Minimum Liability Amount** is **\$194,930**. As mentioned in Step 8, the Enforcement Policy states that when making monetary assessments, the adjusted Total Base Liability Amount shall be at least 10 percent higher than the Economic Benefit Amount. Further, Water Code section 13385, subdivision (e) requires the

¹⁰ Exhibit 114.

Central Coast Water Board to recover any economic benefit or savings received by the violator.

The **Maximum Liability Amount** is **\$6,754,000**. The maximum administrative civil liability that may be assessed pursuant to Water Code section 13385, subdivision (c) is the sum of ten thousand dollars (\$10,000) for each day in which the violation occurs and \$10 for each gallon discharged but not cleaned up that exceeds 1,000 gallons. The maximum administrative civil liability that may be assessed pursuant to Water Code section 13268, subdivision (b)(1) is \$1,000 per day of violation.

10. Step 10 – Final Liability Amount

In accordance with the above methodology, the Central Coast Water Board finds that the **Final Liability Amount** is **\$1,109,812.80**. This Final Liability Amount is within the statutory minimum and maximum amounts.

13. This Order on Complaint is effective and final upon issuance by the Regional Board. Payment must be received by the Regional Board no later than thirty days from the date on which this Order is issued.
14. In the event that District fails to comply with the requirements of this Order, the Executive Officer or his/her delegee is authorized to refer this matter to the Office of the Attorney General for enforcement.
15. Issuance of this Order is exempt from the provisions of the California Environmental Quality Act (Public Resources Code section 21000, et seq.) in accordance with the California Code of Regulations Title 14, Chapter 3, section 15321.

IT IS HEREBY ORDERED, pursuant to California Water Code section 13385 and 13268, that the South San Luis Obispo County Sanitation District is assessed administrative civil liability in the amount of \$1,109,812.80.

The Discharger shall submit a check payable to State Water Resources Control Board in the amount of **\$1,109,812.80** to *SWRCB Accounting, Attn: Enforcement, P.O. Box 100, Sacramento, California 95812-0100* by **November 5, 2012**. A copy of the check shall also be submitted to *Regional Water Quality Control Board, Attn: Harvey Packard, 895 Aerovista Place, Suite 101, San Luis Obispo, California 93401* by **November 5, 2012**. The check shall be made out to the *Clean Up and Abatement Account* and shall include the administrative liability Order No. R3-2012-0041.

Any person aggrieved by this action of the Central Coast Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of the order, except that if the thirtieth day following the date of the order falls on a Saturday, Sunday, or state holiday, the petition must be received by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the internet at http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

I, **Kenneth A. Harris Jr., Interim Executive Officer**, do hereby certify that the foregoing is a full, true, and correct copy of an order adopted by the Central Coast Water Board on October 3, 2012.



Kenneth A. Harris Jr.
Interim Executive Officer

Attachment – Penalty Calculation Methodology Worksheet

Instructions

1. Select Potential Harm for Discharge Violations
2. Select Characteristics of the Discharge
3. Select Susceptibility to Cleanup or Abatement
4. Select Deviation from Standard
5. Click "Determine Harm & per Gallon/Day..."
6. Enter Values into the Yellow highlighted fields

Select Item Major
 Select Item Discharged material poses significant risk
 Select Item < 50% of Discharge Susceptible to Cleanup or A
 Select Item Moderate

Discharger Name/ID:

		Violation 1			
Discharge Violations	Step 1	Potential Harm Factor (Generated from Button)	10		
	Step 2	Per Gallon Factor (Generated from Button)	0.6		
		Gallons	674,400		
		Statutory / Adjusted Max per Gallon (\$)	2.00		
	Total			\$ 809,280	
	Non-Discharge Violations	Step 3	Per Day Factor	0.6	
Days			2		
Statutory Max per Day			10000.00		
Total				\$ 12,000	
Initial Amount of the ACL				\$ 821,280.00	
Add'l Factors	Step 4	Culpability	1.4		
		Cleanup and Cooperation	1		
		History of Violations	0.9		
Step 5 Total Base Liability Amount			\$ 1,034,812.80		
Step 6	Ability to Pay & to Continue in Business	1	\$ 1,034,812.80		
Step 7	Other Factors as Justice May Require	1	\$ 1,034,812.80		
	Staff Costs	\$ 75,000	\$ 1,109,812.80		
Step 8	Economic Benefit	\$ 180,000	\$ 1,109,812.80		
Step 9	Minimum Liability Amount	180,000			
	Maximum Liability Amount	\$ 6,754,000			
Step 10 Final Liability Amount			\$ 1,109,812.80		

Penalty Day Range Generator

Start Date of Violation=
 End Date of Violation=

Maximum Days Fined (Steps 2 & 3) = Days
 Minimum Days Fined (Steps 2 & 3) = Days