

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter of

Euclid of Virginia, Inc.
4225 Connecticut Ave. NW
Washington, DC 20008

Docket No. RCRA-3-2002-0303

)
)
)
)
)
)
)

RCRA (3008) Appeal No. 06-05

Respondent's Brief Exhibit A:

**A-1 – Schedule of Penalties Asserted
In the Initial Opinion**

**A-2 – Difference in Penalties Between Initial
Opinion and Second Amended Complaint**

**A-3 – Reconciliation of Penalty Computation
From Second Amended Complaint**

Euclid of Virginia, Inc.
 RCRA 03-2002-0303
 Summary of Penalties Asserted
 in Initial Opinion

	Counts	Tank Rd	Line RD	Fin Rsp	Tank Cath	Line Cath	Pump Cath	Overfill	Spill
420 Rhode Island Ave - 1		180,000							
	2		85,304						
	3			22,866					
1400 W St. - 4			35,977						
	5			17,998					
42382 John Mosby Hwy - 6		89,878							
	7		50,499						
	8				21,934				
13793 Spottswood Trail - 9		21,016							
	10		13,683						
	11		15,262						
	12		11,495						
	13				3,000				
	14					2,500			
4123 Ocean Gate (Trappe) -15		56,288							
	16		73,604						
	17			47,962					
	18				7,177				
	19							0	
4606 - 68th - 20			34,075						
	21							15,000	
3507 Enterprise - 22		26,414							
	23		15,152						
8248 Ritchie Hwy -24			27,527						
5342 Sheriff Rd. -25			42,680						
	26							6,930	
7713 Allentown Rd -27			46,371						
2301 University Blvd. - 28			45,540						
	29							15,000	
3900 Frederick Rd - 30		126,038							
	31		129,910						
	32				101,689				
	33							4,455	
	34								4,840
4225 Connecticut Ave - 35		168,985							
	36		162,387						
	37						859		
	38			23,622					

Euclid of Virginia, Inc.
RCRA 03-2002-0303
Summary of Penalties Asserted
in Initial Opinion

	Counts	Tank Rd	Line RD	Fin Rsp	Tank Cath	Line Cath	Pump Cath	Overfill	Spill
6181 Annapolis Rd - 39		85,964							
	40		68,035						
	41						3,000		
	42							7,276	
6038 Baltimore Ave. - 43		88,619							
	44		32,807						
	45				8,744				
	46							19,500	
7887 Barlow Rd - 47		0							
	48		42,680						
	49							12,870	
3800 Rhode Island - 50		116,899							
	51		73,287						
	52				20,264				
	53							28,387	
1576 Wisconsin Ave - 54		100,000							
	55		73,287						
	56			22,110					
22 Florida Ave - 57		65,000							
	58		68,200						
	59				86,973				
	60							18,089	
	61			22,110					
15501 New Hampshire - 62		66,392							
	63		71,121						
	64				0				
	65							0	
5001 Georgia Ave - 66			19,422						
	67			11,289					
5420 New Hampshire - 68			12,760						
	69			4,881					
5608 Buckeystown - 70		30,000							
	71		45,760						
	72				0				
	73				3,000				
	74							1,930	
Totals		1,235,176	1,283,142	124,876	293,566	9,677	3,859	129,437	4,840
Grand Total		3,084,573							
Per Complaint		3,085,293	Total Cathodic Penalty =		307,102				

Euclid of Virginia, Inc.
RCRA 03-2002-0303
Diff'ce between 2nd Amd. Complaint
and Initial Opinion

	Counts	Tank Rd	Line RD	Fin Rsp	Tank Cath	Line Cath	Pump Cath	Overfill	Spill
420 Rhode Island Ave - 1		(525)							
	2		24,517						
	3			(2,222)					
1400 W St. - 4			40						
	5			(1,367)					
42382 John Mosby Hwy - 6		(7,558)							
	7		(1,427)						
	8				0				
13793 Spottswood Trail - 9		(1,764)							
	10	(2,343)							
	11		(279)						
	12		0						
	13				696				
	14					1,177			
4123 Ocean Gate (Trappe) -15		12,768							
	16		18						
	17				3,462				
	18					93,799			
	19							23,827	
4606 - 68th - 20			640						
	21							3,643	
3507 Enterprise - 22		(9,815)							
	23		12						
8248 Ritchie Hwy -24			19						
5342 Sheriff Rd. -25			13						
	26							8,228	
7713 Allentown Rd -27			(14,940)						
2301 University Blvd. - 28			732						
	29							6,950	
3900 Frederick Rd - 30		(7,239)							
	31		(45,746)						
	32				(5,527)				
	33							371	
	34								(880)
4225 Connecticut Ave - 35		(12,983)							
	36		(567)						
	37						0		
	38			(2,509)					

Euclid of Virginia, Inc.
 RCRA 03-2002-0303
 Diff'ce between 2nd Amd. Complaint
 and Initial Opinion

	Counts	Tank Rd	Line RD	Fin Rsp	Tank Cath	Line Cath	Pump Cath	Overfill	Spill
6181 Annapolis Rd - 39		(62)							
40			12						
41							3,930		
42								3,342	
6038 Baltimore Ave. - 43		(6,684)							
44			(264)						
45					(0)				
46								2,425	
7887 Barlow Rd - 47		44,810							
48			(280)						
49								0	
3800 Rhode Island - 50		(9,087)							
51			14						
52					(63)				
53								(27)	
1576 Wisconsin Ave - 54		7,813							
55			13						
56				(1,466)					
22 Florida Ave - 57		2,140							
58			(288)						
59					7,162				
60								(6,460)	
61				(1,934)					
15501 New Hampshire - 62		(5,497)							
63			15						
64					40,056				
65								12,066	
5001 Georgia Ave - 66			23						
67				(808)					
5420 New Hampshire - 68			16						
69				(362)					
5608 Buckeystown - 70		19,046							
71			(273)						
72					20,202				
73					1,455				
74								1	
Totals		23,021	(37,980)	(10,668)	67,443	94,976	3,930	54,365	(880)
Grand Total		194,207							
Penalties in Excess of Complaint		(63,556)	(64,064)	(10,668)	(5,590)	0	0	(6,487)	(880)

Euclid of Virginia, Inc.
RCRA 03-2002-0303
Summary of Penalties Asserted
by Complainant

Counts	Tank Rd	Line RD	Fin Rsp	Tank Cath	Line Cath	Pump Cath	Overfill	Spill
420 Rhode Island Ave - 1	179,475							
2		109,821						
3			20,644					
1400 W St. - 4		36,017						
5			16,631					
42382 John Mosby Hwy - 6	82,320							
7		49,072						
8				21,934				
13793 Spottswood Trail - 9	19,252							
10	11,340							
11		14,983						
12		11,495						
13				3,696				
14					3,677			
4123 Ocean Gate (Trappe) -15	69,056							
16		73,622						
17				51,424				
18					100,976			
19							23,827	
4606 - 68th - 20		34,715						
21							18,643	
3507 Enterprise - 22	16,599							
23		15,164						
8248 Ritchie Hwy -24		27,546						
5342 Sheriff Rd. -25		42,693						
26							15,158	
7713 Allentown Rd -27		31,431						
2301 University Blvd. - 28		46,272						
29							21,950	
3900 Frederick Rd - 30	118,799							
31		84,164						
32				96,162				
33							4,826	
34								3,960
4225 Connecticut Ave - 35	156,002							
36		161,820						
37						859		
38			21,113					

**Euclid of Virginia, Inc.
RCRA 03-2002-0303
Summary of Penalties Asserted
by Complainant**

Counts	Tank Rd	Line RD	Fin Rsp	Tank Cath	Line Cath Pump Cath	Overfill	Spill
6181 Annapolis Rd - 39	85,902						
40		68,047					
41					6,930		
42						10,618	
6038 Baltimore Ave. - 43	81,935						
44		32,543					
45				8,744			
46						21,925	
7887 Barlow Rd - 47	44,810						
48		42,400					
49						12,870	
3800 Rhode Island - 50	107,813						
51		73,301					
52				20,202			
53						28,360	
1576 Wisconsin Ave - 54	107,813						
55		73,300					
56			20,644				
22 Florida Ave - 57	67,140						
58		67,912					
59				94,135			
60						11,629	
61			20,176				
15501 New Hampshire - 62	60,896						
63		71,136					
64				40,056			
65						12,066	
5001 Georgia Ave - 66		19,445					
67			10,481				
5420 New Hampshire - 68		12,776					
69			4,519				
5608 Buckeystown - 70	49,046						
71		45,487					
72				20,202			
73				4,455			
74						1,931	
Totals	1,258,197	1,245,162	114,208	361,009	104,653	7,789	183,802
Grand Total	3,278,780						
Per Complaint	3,408,967	add in \$1,200 for polling and \$128,987 for environmental manager					

----- ***** Per E P A ***** -----

420 RI Ave	Count One			Count Two	Count 3				
Description	tank release det			Line Release	Fin Rsp				
Tank/Line/Other	tank 1-3	tank 1-3	tank 4	lines	finance				
Level	maj/maj	mod/maj	maj/maj	maj/maj	maj/mod				
Matrix Value	1,650	1,100	1,650	1,650	825				
# UST or other	3	3	1	3	1				
Subtotal	4,950	3,300	1,650	4,950	825	0	0	0	0
DNC Multiplier	6.0	1.0	7.0	5.5	6.5				
Subtotal	29,700	3,300	11,550	27,225	5,363	0	0	0	0
Non-Cooperation	25%	25%	25%	25%	0%				
Negligence/Wilfulness	50%	50%	50%	50%	50%				
History of Noncompliance	25%	25%	25%	25%	25%				
Total Percentage	100%	100%	100%	100%	75%	0%	0%	0%	0%
Subtotal	59,400	6,600	23,100	54,450	9,384	0	0	0	0
Environmental Sensitivity	2.00	2.00	2.00	2.00	2.00				
Subtotal	118,800	13,200	46,200	108,900	18,769	0	0	0	0
Economic Benefit	1,275	0	0	921	1,875				
Total per Violation	120,075	13,200	46,200	109,821	20,644	0	0	0	0
Total for All Counts	309,940								

1400 W	Count 4	Count 5							
Description	Line RD	Fin Rsp							
Tank/Line/Other	line 1&2	finance							
Level	mod/maj	maj/mod							
Matrix Value	1,100	825							
# UST or other	2	1							
Subtotal	2,200	825	0	0	0	0	0	0	0
DNC Multiplier	5.5	5.5							
Subtotal	12,100	4,538	0	0	0	0	0	0	0
Non-Cooperation	15%	0%							
Negligence/Wilfulness	15%	50%							
History of Noncompliance	15%	25%							
Total Percentage	45%	75%	0%	0%	0%	0%	0%	0%	0%
Subtotal	17,545	7,941	0	0	0	0	0	0	0
Environmental Sensitivity	2.0	2.0							
Subtotal	35,090	15,881	0	0	0	0	0	0	0
Economic Benefit	927	750							
Total per Violation	36,017	16,631	0	0	0	0	0	0	0
Total for All Counts	52,648								

42382 Mosby	<u>Count 6</u>	<u>Count 6</u>	<u>Count 7</u>	<u>Count 7</u>	<u>Count 8</u>
Description	tank release det		Line Release det		cathodic
Tank/Line/Other	UST 1-4	UST 1-3	Line 1-3	UST 4	UST 1-4
Level	maj/maj	mod/maj	mod/maj	mod/maj	maj/maj
Matrix Value	1,650	1,100	1,100	1,100	825
# UST or other	4	4	3	1	4
Subtotal	6,600	4,400	3,300	1,100	3,300
DNC Multiplier	6.0	1.5	6.5	5.5	4.0
Subtotal	39,600	6,600	21,450	6,050	13,200
Non-Cooperation	10%	10%	10%	10%	5%
Negligence/Wilfullness	15%	15%	15%	15%	15%
History of Noncompliance	15%	15%	15%	15%	10%
Total Percentage	40%	40%	40%	40%	30%
Subtotal	55,440	9,240	30,030	8,470	17,160
Environmental Sensitivity	1.25	1.25	1.25	1.25	1.25
Subtotal	69,300	11,550	37,538	10,588	21,450
Economic Benefit	1,470		947		484
Total per Violation	70,770	11,550	38,485	10,588	21,934
Total for All Counts	153,326				

13793 Spottswood	<u>Count 9</u>	<u>Count 10</u>	<u>Count 11</u>	<u>Count 12</u>	<u>Count 13</u>	<u>Count 14</u>
Description	Tank Rd	Tank RD	Line RD	Line RD	Tank Cath	Line Cath
Tank/Line/Other	tank 1-2	tank 3-4	Line 1-2	Line 3-4	Tank 3-4	Tank 3-4
Level	mod/maj	maj/maj	mod/maj	maj/maj	maj/maj	maj/maj
Matrix Value	1,100	1,650	1,100	1,650	1,650	1,650
# UST or other	2	2	2	2	2	2
Subtotal	2,200	3,300	2,200	3,300	3,300	3,300
DNC Multiplier	6.0	3.0	4.5	3.0	1.0	1
Subtotal	13,200	9,900	9,900	9,900	3,300	3,300
Non-Cooperation	15%	0%	15%	0%	0%	0%
Negligence/Wilfullness	15%	5%	15%	5%	5%	5%
History of Noncompliance	15%	5%	15%	5%	5%	5%
Total Percentage	45%	10%	45%	10%	10%	10%
Subtotal	19,140	10,890	14,355	10,890	3,630	3,630
Environmental Sensitivity	1.00	1.00	1.00	1.00	1.00	1.00
Subtotal	19,140	10,890	14,355	10,890	3,630	3,630
Economic Benefit	112	450	628	605	66	47
Total per Violation	19,252	11,340	14,983	11,495	3,696	3,677
Total for All Counts	64,443					

4123 Ocean Gate	Count 15		Count 16	Count 17			Count 18	Count 19
Description	tank release det		Line RD	Cathodic			Line CP	Overfill
Tank/Line/Other	tank 1-3	tank 1-3	Line 1-3	UST 1	UST 2-3	UST 2-3	Line 1-3	USt 1-3
Level	maj/maj	mod/maj	maj/maj	maj/mod	mod/maj	mod/maj	maj/maj	mod/mod
Matrix Value	1,650	1,100	1,650	825	825	1,100	1,650	550
# UST or other	3	3	3	1	2	2	3	3
Subtotal	4,950	3,300	4,950	825	1,650	2,200	4,950	1,650
DNC Multiplier	4.0	3.5	6.5	7.5	4.5	3	8	7
Subtotal	19,800	11,550	32,175	6,188	7,425	6,600	39,600	10,725
Non-Cooperation	15%	15%	20%	25%	25%	25%	25%	15%
Negligence/Wilfullness	15%	15%	15%	25%	25%	25%	25%	15%
History of Noncompliance	15%	15%	15%	15%	15%	15%	15%	15%
Total Percentage	45%	45%	50%	65%	65%	65%	65%	45%
Subtotal	28,710	16,748	48,263	10,209	12,251	10,890	65,340	15,551
Environmental Sensitivity	1.50	1.50	1.50	1.50	1.50	1.50	1.50	1.50
Subtotal	43,065	25,121	72,394	15,314	18,377	16,335	98,010	23,327
Economic Benefit	870	0	1,228	968	0	430	2,966	500
Total per Violation	43,935	25,121	73,622	16,282	18,377	16,765	100,976	23,827
Total for All Counts	318,905							

4606 - 68th	Count 20	Count 21
Description	Line RD	Overfill
Tank/Line/Other	tank 1-2	tank 1-2
Level	mod/maj	mod/maj
Matrix Value	1,100	550
# UST or other	2	2
Subtotal	2,200	1,100
DNC Multiplier	6.0	6.5
Subtotal	13,200	7,150
Non-Cooperation	15%	15%
Negligence/Wilfullness	15%	15%
History of Noncompliance	15%	15%
Total Percentage	45%	45%
Subtotal	19,140	10,368
Environmental Sensitivity	1.75	1.75
Subtotal	33,495	18,143
Economic Benefit	1,220	500
Total per Violation	34,715	18,643
Total for All Counts	53,358	

3507 Enterprise	<u>Count 22</u>	<u>Count 23</u>
Description	Tank Rd	Line RD
Tank/Line/Other	tank 1-2	Line 1-2
Level	mod/maj	maj/maj
Matrix Value	1,100	1,650
# UST or other	<u>2</u>	<u>2</u>
Subtotal	2,200	3,300
DNC Multiplier	5.0	3.0
Subtotal	<u>11,000</u>	<u>9,900</u>
Non-Cooperation	20%	20%
Negligence/Wilfullness	15%	15%
History of Noncompliance	15%	15%
Total Percentage	50%	50%
Subtotal	16,500	14,850
Environmental Sensitivity	1.00	1.00
Subtotal	<u>16,500</u>	<u>14,850</u>
Economic Benefit	<u>99</u>	<u>314</u>
Total per Violation	16,599	15,164
Total for All Counts	31,763	

8429 Ritchie	<u>Count 24</u>
Description	Line RD
Tank/Line/Other	Lines 1-3
Level	mod/maj
Matrix Value	1,100
# UST or other	<u>3</u>
Subtotal	3,300
DNC Multiplier	5.5
Subtotal	<u>18,150</u>
Non-Cooperation	15%
Negligence/Wilfullness	15%
History of Noncompliance	15%
Total Percentage	45%
Subtotal	26,318
Environmental Sensitivity	1.00
Subtotal	<u>26,318</u>
Economic Benefit	<u>1,228</u>
Total per Violation	27,546
Total for All Counts	27,546

5342 Sheriff Rd	<u>Count 25</u>	<u>Count 26</u>	
Description	Line RD	Overfill#1	Overfill #2
Tank/Line/Other	UST -12	UST Prem	UST Reg
Level	mod/maj	mod/mod	mod/mod
Matrix Value	1,100	550	550
# UST or other	2	1	1
Subtotal	2,200	550	550
DNC Multiplier	6.5	6.5	6.5
Subtotal	14,300	3,575	3,575
Non-Cooperation	15%	10%	0%
Negligence/Wilfullness	15%	-10%	-25%
History of Noncompliance	15%	15%	15%
Total Percentage	45%	15%	-10%
Subtotal	20,735	4,111	3,218
Environmental Sensitivity	2.00	2.00	2.00
Subtotal	41,470	8,223	6,435
Economic Benefit	1,223	500	0
Total per Violation	42,693	8,723	6,435
Total for All Counts	57,851		

7713 Allentown Rd	<u>Count 27</u>
Description	Line RD
Tank/Line/Other	UST 1-3
Level	mod/maj
Matrix Value	1,100
# UST or other	2
Subtotal	2,200
DNC Multiplier	7.5
Subtotal	16,500
Non-Cooperation	15%
Negligence/Wilfullness	15%
History of Noncompliance	15%
Total Percentage	45%
Subtotal	23,925
Environmental Sensitivity	1.25
Subtotal	29,906
Economic Benefit	1,525
Total per Violation	31,431
Total for All Counts	31,431

2301 Univ Blvd	Count 28		Count 29
Description	Line RD	Line RD	Overfill
Tank/Line/Other	UST1Line1	UST1Line2	UST 1-2
Level	mod/maj	mod/maj	mod/maj
Matrix Value	1,100	1,100	550
# UST or other	1	1	2
Subtotal	1,100	1,100	1,100
DNC Multiplier	6.5	6.5	6.5
Subtotal	7,150	7,150	7,150
Non-Cooperation	20%	15%	20%
Negligence/Wilfulness	35%	15%	15%
History of Noncompliance	15%	15%	15%
Total Percentage	70%	45%	50%
Subtotal	12,155	10,368	10,725
Environmental Sensitivity	2.00	2.00	2.00
Subtotal	24,310	20,735	21,450
Economic Benefit	1,227	0	500
Total per Violation	25,537	20,735	21,950
Total for All Counts	68,222		

3900 Frederick	Count 30		Count 31	Count 32		Count 33	Count 34
Description	Tank Rd	Tank RD	Line RD	Cathodic&tst	Cathodic&tst	Overfill	Spill
Tank/Line/Other	UST 1-4	UST 1-4	Line 1-4	UST 1	UST 2-4	UST 1	UST 1-4
Level	maj/maj	mod/maj	mod/maj	maj/mod	maj/maj	mod/mod	mod/mod
Matrix Value	1,650	1,100	1,100	1,650	1,650	550	550
# UST or other	4	4	4	1	3	1	4
Subtotal	6,600	4,400	4,400	1,650	4,950	550	2,200
DNC Multiplier	4.5	2.5	6.5	5.5	5.0	6.5	1.0
Subtotal	29,700	11,000	28,600	9,075	24,750	3,575	2,200
Non-Cooperation	15%	15%	15%	0%	0%	0%	0%
Negligence/Wilfulness	15%	15%	15%	25%	25%	-25%	-25%
History of Noncompliance	15%	15%	15%	15%	15%	15%	15%
Total Percentage	45%	45%	45%	40%	40%	-10%	-10%
Subtotal	43,065	15,950	41,470	12,705	34,650	3,218	1,980
Environmental Sensitivity	2.00	2.00	2.00	2.00	2.00	1.50	2.00
Subtotal	86,130	31,900	82,940	25,410	69,300	4,826	3,960
Economic Benefit	769	0	1,224	1,452	0	0	0
Total per Violation	86,899	31,900	84,164	26,862	69,300	4,826	3,960
Total for All Counts	307,911						

4225 Connecticut	<u>Count 35</u>		<u>Count 36</u>	<u>Count 37</u>	<u>Count 38</u>
Description	Tank Rd	Tank RD	Line RD	pump cp	fin rsp
Tank/Line/Other	UST 1-5	UST 1-5	UST 1-5	UST 5	fac
Level	maj/maj	mod/maj	maj/maj	mod/mod	maj/mod
Matrix Value	1,650	1,100	1,650	550	825
# UST or other	5	5	5	1	1
Subtotal	8,250	5,500	8,250	550	825
DNC Multiplier	6.0	1.0	6.5	1.0	6.5
Subtotal	49,500	5,500	53,625	550	5,363
Non-Cooperation	10%	15%	20%	0%	0%
Negligence/Wilfulness	15%	15%	15%	10%	50%
History of Noncompliance	15%	15%	15%	15%	25%
Total Percentage	40%	45%	50%	25%	75%
Subtotal	69,300	7,975	80,438	688	9,384
Environmental Sensitivity	2.00	2.00	2.00	1.25	2.00
Subtotal	138,600	15,950	160,875	859	18,769
Economic Benefit	1,452	0	945	0	2,344
Total per Violation	140,052	15,950	161,820	859	21,113
Total for All Counts	339,794				

6181 Annapolis Rd	<u>Count 39</u>			<u>Count 40</u>	<u>Count 41</u>	<u>Count 42</u>	
Description	Tank Rd	Tank RD	Tank RD	Line RD	Pump CP	overfill	overfill
Tank/Line/Other	UST 1-3	UST 1-3	UST 4	Line 1-3	UST 1-3	UST 1-2	UST 3
Level	maj/maj	mod/maj	maj/maj	maj/maj	mod/maj	mod/mod	mod/min
Matrix Value	1,650	1,100	1,650	1,650	1,100	550	110
# UST or other	3	3	1	3	3	2	1
Subtotal	4,950	3,300	1,650	4,950	3,300	1,100	110
DNC Multiplier	4.5	2.5	6.0	6.0	1.0	6.5	6.5
Subtotal	22,275	8,250	9,900	29,700	3,300	7,150	715
Non-Cooperation	15%	15%	0%	20%	0%	0%	0%
Negligence/Wilfulness	15%	15%	15%	15%	20%	-25%	-25%
History of Noncompliance	15%	15%	10%	15%	20%	15%	15%
Total Percentage	45%	45%	25%	50%	40%	-10%	-10%
Subtotal	32,299	11,963	12,375	44,550	4,620	6,435	644
Environmental Sensitivity	1.5	1.5	1.5	1.5	1.5	1.5	1.5
Subtotal	48,448	17,944	18,563	66,825	6,930	9,653	965
Economic Benefit	948	0	0	1,222	0	0	0
Total per Violation	49,396	17,944	18,563	68,047	6,930	9,653	965
Total for All Counts	171,497						

6038 Baltimore Ave	<u>Count 43</u>		<u>Count 44</u>	<u>Count 45</u>	<u>Count 46</u>
Description	Tank Rd	Tank RD	Line RD	cathodic	overfill
Tank/Line/Other	UST 1-2	UST 3	Line 1-2	UST 3	UST 1-2
Level	mod/maj	maj/maj	mod/maj	maj/mod	mod/mod
Matrix Value	1,100	1,650	1,100	825	550
# UST or other	2	1	2	1	2
Subtotal	2,200	1,650	2,200	825	1,100
DNC Multiplier	7.0	7.5	5.0	6.5	6.5
Subtotal	15,400	12,375	11,000	5,363	7,150
Non-Cooperation	15%	15%	15%	15%	20%
Negligence/Wilfullness	15%	20%	15%	15%	15%
History of Noncompliance	15%	15%	15%	15%	15%
Total Percentage	45%	50%	45%	45%	50%
Subtotal	22,330	18,563	15,950	7,776	10,725
Environmental Sensitivity	2.00	2.00	2.00	1.00	2.00
Subtotal	44,660	37,125	31,900	7,776	21,450
Economic Benefit	150	0	643	968	475
Total per Violation	44,810	37,125	32,543	8,744	21,925
Total for All Counts	145,147				

7557 Barlow Rd	<u>Count 47</u>	<u>Count 48</u>	<u>Count 49</u>
Description	UST RD	Line RD	overfill
Tank/Line/Other	UST 1-2	Line 1-2	UST 1-2
Level	mod/maj	mod/maj	mod/mod
Matrix Value	1,100	1,100	550
# UST or other	2	2	2
Subtotal	2,200	2,200	1,100
DNC Multiplier	7.0	6.5	6.5
Subtotal	15,400	14,300	7,150
Non-Cooperation	15%	15%	0%
Negligence/Wilfullness	15%	15%	-25%
History of Noncompliance	15%	15%	15%
Total Percentage	45%	45%	-10%
Subtotal	22,330	20,735	6,435
Environmental Sensitivity	2.00	2.00	2.00
Subtotal	44,660	41,470	12,870
Economic Benefit	150	930	0
Total per Violation	44,810	42,400	12,870
Total for All Counts	100,080		

3800 Rhode Island	<u>Count 50</u>		<u>Count 51</u>	<u>Count 52</u>	<u>Count 53</u>
Description	Tank Rd	Tank RD	Line RD	cathodic	overfill
Tank/Line/Other	UST 1-3	UST 4	Line 1-3	UST 4	UST 1-3
Level	mod/maj	maj/maj	mod/maj	maj/maj	mod/mod
Matrix Value	1,100	1,650	1,100	1,650	550
# UST or other	3	1	3	1	3
Subtotal	3,300	1,650	3,300	1,650	1,650
DNC Multiplier	7.5	7.5	7.5	6.5	6.5
Subtotal	24,750	12,375	24,750	10,725	10,725
Non-Cooperation	15%	15%	15%	20%	0%
Negligence/Wilfullness	15%	15%	15%	15%	15%
History of Noncompliance	15%	15%	15%	15%	15%
Total Percentage	45%	45%	45%	50%	30%
Subtotal	35,888	17,944	35,888	16,088	13,943
Environmental Sensitivity	2.00	2.00	2.00	1.00	2.00
Subtotal	71,775	35,888	71,775	16,088	27,885
Economic Benefit	150	0	1,526	4,114	475
Total per Violation	71,925	35,888	73,301	20,202	28,360
Total for All Counts	229,675				

1576 Wisconsin Ave	<u>Count 54</u>		<u>Count 55</u>	<u>Count 56</u>
Description	Tank Rd	Tank RD	Line RD	Fin rsp
Tank/Line/Other	UST 1-3	UST 4	Line 1-3	fac
Level	mod/maj	maj/maj	mod/maj	maj/mod
Matrix Value	1,100	1,650	1,100	825
# UST or other	3	1	3	1
Subtotal	3,300	1,650	3,300	825
DNC Multiplier	7.5	7.5	7.5	6.5
Subtotal	24,750	12,375	24,750	5,363
Non-Cooperation	15%	15%	15%	0%
Negligence/Wilfullness	15%	15%	15%	50%
History of Noncompliance	15%	15%	15%	25%
Total Percentage	45%	45%	45%	75%
Subtotal	35,888	17,944	35,888	9,384
Environmental Sensitivity	2.00	2.00	2.00	2.00
Subtotal	71,775	35,888	71,775	18,769
Economic Benefit	150	0	1,525	1,875
Total per Violation	71,925	35,888	73,300	20,644
Total for All Counts	201,756			

22 Fla Ave	<u>Count 57</u>	<u>Count 58</u>	<u>Count 59</u>	<u>Count 60</u>		<u>Count 61</u>
Description	Tank Rd	Line RD	cathodic	overfill	overfill	Fin rsp
Tank/Line/Other	UST 1-3	Line 1-3	UST 1-3	UST 1	UST 2-3	fac
Level	mod/maj	mod/maj	maj/maj	mod/mod	mod/min	maj/mod
Matrix Value	1,100	1,100	1,650	550	110	825
# UST or other	3	3	3	1	2	1
Subtotal	3,300	3,300	4,950	550	220	825
DNC Multiplier	7.0	7.0	6.5	6.5	6.5	6.5
Subtotal	23,100	23,100	32,175	3,575	1,430	5,363
Non-Cooperation	15%	15%	0%	15%	0%	0%
Negligence/Wilfulness	15%	15%	25%	-10%	-25%	50%
History of Noncompliance	15%	15%	20%	15%	15%	25%
Total Percentage	45%	45%	45%	20%	-10%	75%
Subtotal	33,495	33,495	46,654	4,290	1,287	9,384
Environmental Sensitivity	2.0	2.00	2.00	2.00	2.00	2.00
Subtotal	66,990	66,990	93,308	8,580	2,574	18,769
Economic Benefit	150	922	827	475	0	1,407
Total per Violation	67,140	67,912	94,135	9,055	2,574	20,176
Total for All Counts	260,991					

15501 New Hampshire	<u>Count 62</u>		<u>Count 63</u>	<u>Count 64</u>		<u>Count 65</u>
Description	Tank Rd	Tank RD	Line RD	cathodic	cathodic	overfill
Tank/Line/Other	UST 1-3	UST 1-3	Line 1-3	UST 1-3	UST 1-3	UST 1-3
Level	maj/maj	mod/maj	maj/maj	maj/mod	mod/min	mod/mod
Matrix Value	1,650	1,100	1,650	825	1,100	550
# UST or other	3	3	3	3	3	3
Subtotal	4,950	3,300	4,950	2,475	3,300	1,650
DNC Multiplier	5.0	2.5	7.5	1.5	5.0	6.5
Subtotal	24,750	8,250	37,125	3,713	16,500	10,725
Non-Cooperation	15%	15%	20%	20%	20%	0%
Negligence/Wilfulness	15%	15%	15%	15%	15%	-25%
History of Noncompliance	15%	15%	15%	15%	15%	15%
Total Percentage	45%	45%	50%	50%	50%	-10%
Subtotal	35,888	11,963	55,688	5,569	24,750	9,653
Environmental Sensitivity	1.25	1.25	1.25	1.25	1.25	1.25
Subtotal	44,859	14,953	69,609	6,961	30,938	12,066
Economic Benefit	1,083	0	1,527	968	1,190	0
Total per Violation	45,942	14,953	71,136	7,929	32,128	12,066
Total for All Counts	184,154					

5001 Ga Ave	<u>Count 66</u>	<u>Count 67</u>
Description	Line RD	Fin rsp
Tank/Line/Other	Line 3-4	fac
Level	mod/maj	maj/mod
Matrix Value	1,100	825
# UST or other	2	1
Subtotal	2,200	825
DNC Multiplier	3.0	3.5
Subtotal	6,600	2,888
Non-Cooperation	15%	0%
Negligence/Wilfullness	15%	50%
History of Noncompliance	15%	25%
Total Percentage	45%	75%
Subtotal	9,570	5,053
Environmental Sensitivity	2.00	2.00
Subtotal	19,140	10,106
Economic Benefit	305	375
Total per Violation	19,445	10,481
Total for All Counts	29,926	

5420 NH Ave	<u>Count 68</u>	<u>Count 69</u>
Description	Line RD	Fin rsp
Tank/Line/Other	Line 1-2	fac
Level	mod/maj	maj/mod
Matrix Value	1,100	825
# UST or other	2	1
Subtotal	2,200	825
DNC Multiplier	2.0	1.5
Subtotal	4,400	1,238
Non-Cooperation	15%	0%
Negligence/Wilfullness	15%	50%
History of Noncompliance	15%	25%
Total Percentage	45%	75%
Subtotal	6,380	2,166
Environmental Sensitivity	2.00	2.00
Subtotal	12,760	4,331
Economic Benefit	16	188
Total per Violation	12,776	4,519
Total for All Counts	17,295	

5608 Buckeystown Pk	<u>Count 70</u>		<u>Count 71</u>	<u>Count 72</u>	<u>Count 73</u>	<u>Count 74</u>
Description	Tank Rd	Tank RD	Line RD	cathodic	cathodic	overfill
Tank/Line/Other	UST 1-3	UST 4	Line 1-3	UST 4	UST 1-3	UST 1-3
Level	mod/maj	maj/maj	maj/maj	maj/maj	mod/min	mod/min
Matrix Value	1,100	1,650	1,650	1,650	1,100	110
# UST or other	3	1	3	1	3	3
Subtotal	3,300	1,650	4,950	1,650	3,300	330
DNC Multiplier	6.5	7.5	6.0	6.5	1.0	6.5
Subtotal	21,450	12,375	29,700	10,725	3,300	2,145
Non-Cooperation	15%	15%	20%	20%	0%	0%
Negligence/Wilfullness	15%	15%	15%	15%	15%	-25%
History of Noncompliance	15%	15%	15%	15%	20%	15%
Total Percentage	45%	45%	50%	50%	35%	-10%
Subtotal	31,103	17,944	44,550	16,088	4,455	1,931
Environmental Sensitivity	1.00	1.00	1.00	1.00	1.00	1.00
Subtotal	31,103	17,944	44,550	16,088	4,455	1,931
Economic Benefit	0	0	937	4,114	0	0
Total per Violation	31,103	17,944	45,487	20,202	4,455	1,931
Total for All Counts	121,120					