

**Attachment A**

**Penalty Summary Sheet**

JLM Chemicals, Inc.

Blue Island, Illinois

ILD981093180

RCRA CEI - March 19, 2007

Table Updated - September 2, 2009

NATURE OF VIOLATION	CITATION OF REGULATION OR LAW	HARM/ DEVIATION	GRAVITY-BASED PENALTY	MULTI-DAY/ MULTI - PENALTY	ADJUSTMENTS	ECONOMIC BENEFIT	TOTAL PENALTY
COUNT 1: Failure to offer hazardous waste for transportation with a hazardous waste manifest.	35 IAC § 722.120(a) [40 CFR § 262.20(a)(1)]	Major / Major	\$32,500	\$902,720	10%	\$23,400	\$1,048,892
COUNT 2: Containers in poor condition and releases of hazardous waste	35 IAC §§ 722.134(a)(1)(A); 722.134(c)(1)(A); 725.271 (40 CFR §§ 262.34(a)(1)(i), 262.34(c)(1)(i); 265.171). 35 IAC §§ 722.134(a)(4); 725.131 (40 CFR §§ 262.34(a)(4); 265.31)	Major / Moderate	\$25,790	\$0		\$0	\$25,790
COUNT 3: Open hazardous waste containers	35 IAC §§ 722.134(c)(1)(A); 725.273(a) [40 CFR §§ 262.34(c)(1)(i); 265.173(a)]	Moderate / Minor	\$6,447	\$0		\$0	\$6,447
COUNT 4: Failure to label containers of hazardous waste generated at the facility.	35 IAC § 725.134(a)(3) [40 CFR § 262.34(a)(3)]. 35 IAC § 725.134(c) [40 CFR § 262.34(c)(1)(ii)]. 35 IAC Part 724, 35 IAC §§ 703.121, 702.120, and 702.123 [40 CFR part 264, 40 CFR §§ 270.1(c), 270.10(a) and (d), and 270.13].	Moderate / Minor	\$5,803	\$0		\$0	\$5,803
<b>TOTAL</b>			<b>\$70,540</b>	<b>\$902,720</b>		<b>\$23,400</b>	<b>\$1,086,932</b>
<b>ROUNDED TOTAL</b>							<b>\$1,086,900</b>

Note: The gravity-based penalty amount is determined using the penalty assessment matrix found at page 19 of the RCRA Civil Penalty Policy, issued on October 28, 1990. The multi-day component of the gravity-based civil penalty is determined using the multi-day matrix found at page 24 of the RCRA Civil Penalty Policy. Policy adjustments and economic benefit (BEN) are as explained in the Penalty Policy. Finally, the gravity-based penalty is adjusted for inflation (where appropriate) in order to implement the Civil Monetary Penalty Inflation Rule pursuant to the Debt Collection Improvement Act of 1996.