UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

BEFORE THE ADMINISTRATOR

IN THE MATTER OF:	)	
	)	
Mardaph II LLC, Mardaph III LLC and Vinnie Wilson,	)	**Docket No. TSCA-05-2008-0019**
	)	
	)	
Respondents	)	

INITIAL DECISION AND ORDER ON PENALTY

I. Background

On August 4, 2008, the United States Environmental Protection Agency, Region 5 ("Complainant" or "EPA") initiated this proceeding by filing a 47 count Administrative Complaint against Mardaph II LLC, Mardaph III LLC, and Vinnie Wilson ("Respondents"), alleging violations of the Residential Lead-Based Paint Hazard Reduction Act of 1992, 42 U.S.C. §§ 4851 *et seq.* (the "Act") and the regulations promulgated thereunder at 40 C.F.R. Part 745, Subpart F, entitled "Disclosure of Known Lead-Based Paint and/or Lead-Based Paint Hazards Upon Sale or Lease of Residential Property (the "Disclosure Rule"). Specifically, the Complaint asserted that Respondents, as lessors or agents, had failed to include within, or attach to, leases for ten residential housing units in Cincinnati, Ohio, certain warning statements, disclosure statements, record lists, receipt affirmations, and/or signatures, relating to the presence of lead-based paint therein, as required by the Act and the Disclosure Rule.

Respondents, appearing *pro se*, filed an Answer to the Complaint on May 26, 2009.[1] In response to a Prehearing Order issued, Complainant then timely filed its Prehearing Exchange on November 20, 2009. However, despite being granted two lengthy extensions of time to do so, Respondents never filed their prehearing exchange nor did they respond to a Show Cause Order issued in regard thereto on March 25, 2010. As a result, on April 15, 2010, a Decision and Order on Default ("Default Order") was issued finding Respondents in default and liable for the 47 violations alleged in the Complaint. The Default Order reserved decision on the issue of the penalty pending submission of a statement from Complainant in regard thereto. It also provided Respondents with the opportunity to respond to Complainant's penalty statement and/or to submit all documents they "consider relevant to the assessment of any penalties for the

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[1] The Answer appeared to be submitted only on behalf of Respondent Vinnie Wilson. However, in a handwritten sworn verification submitted on July 6, 2009, Ms. Wilson indicated that "I am the Respondent's [sic] and the other two Respondent's [sic], named as, Mardaph II and Mardaph III, in the above styled docket case number."

violations" on or before May 14, 2010. On April 29, 2010, Complainant filed its Memorandum on Proposed Penalty ("Memorandum"). To date, Respondents have not filed any response thereto or any additional documents with regard to the penalties, and have not requested additional time to do so. As such, it is appropriate at this time to rule on the remaining issue of the appropriate penalties, if any, to impose upon Respondents for the violations as to which they were found liable upon default.

II. Penalty Criteria

The Consolidated Rules of Practice ("Rules") provide in pertinent part that, upon default

> The relief proposed in the complaint or the motion for default shall be ordered unless the requested relief is clearly inconsistent with the record of the proceeding or the Act.

40 C.F.R. § 22.17(c).

Further as to penalty determinations generally, the Rules provide in pertinent part that:

> if the Presiding Officer determines that a violation has occurred and the complaint seeks a civil penalty, the Presiding Officer shall determine the amount of the recommended civil penalty based upon the evidence in the record and in accordance with any civil penalty criteria in the Act. The Presiding Officer shall consider any civil penalty guidelines issued under the Act.

40 C.F.R. § 22.27(b).

As indicated above, Respondents have been found to have violated the Residential Lead based Paint Hazard Reduction Act of 1992 ("the Act"), 42 U.S.C. §§ 4851-56. Section 1018 of the Act provides that a violation of any of its requirements "shall be a prohibited act under section 409 of the Toxic Substances Control Act (TSCA) [15 U.S.C.A. § 2689] . . . [and] the penalty for each violation under section 16 of that Act [15 U.S.C.A. § 2615] shall not be more than $ 10,000."[2] 42 U.S.C. § 4852d(b)(5). The applicable statutory criteria for the assessment of a penalty are, therefore, delineated in TSCA.

Section 16 of TSCA provides that "in determining the amount of a civil penalty, the Administrator shall take into account the nature, circumstances, extent, gravity of the violation or

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[2] Pursuant to the Civil Monetary Penalty Inflation Adjustment Rule, the maximum penalty was increased to $11,000 for violations of Section 1018 of the Act occurring at the time of those alleged in the Complaint (2005-2007). *See,* 40 C.F.R. Part 19.

violations and, with respect to the violator, ability to pay, effect on ability to continue in business, any history of such prior violations, the degree of culpability, and such other matters as justice may require." 15 U.S.C. § 2615(a)(2)(B).

In December 2007, EPA's Office of Enforcement and Compliance Assurance, Office of Civil Enforcement, Waste and Chemical Enforcement Division, issued a Section 1018 - Disclosure Rule Enforcement Response and Penalty Policy ("ERP"). Complainant's Prehearing Exchange ("C's PHE") Ex. 27. This policy, with minor exceptions, follows the penalty factors set forth in TSCA.

The ERP sets forth a two stage process for calculating a proposed civil penalty for a violation of the Act's Disclosure Rule by a "responsible party."[3] The first step is the determination of a "gravity-based penalty," referring to the overall seriousness of the violation, taking into account the "nature" of the violation, the "circumstances" of the violation, and the "extent" of harm that may result from a given violation. C's PHE Ex. 27 at 11. These factors are incorporated into a penalty matrix (the Gravity-Based Penalty Matrix) which specifies the appropriate gravity-based penalty. C's PHE Ex. 27 at 9 and 27-30 (Appendix B Penalty Matrices). The second stage involves the upward or downward adjustment of the gravity-based penalty in consideration of the violator's ability to pay/continue in business, history of prior violations, degree of culpability, voluntary disclosure, and "such other factors as justice may require." C's PHE Ex. 27 at 9, 17-23.

The ERP characterizes the "nature" of the Act's Disclosure Rule violations as affecting "hazard assessment," *i.e.,* designed to provide potential purchasers and lessees of target housing with information that will permit them to weigh and assess the risks presented by the actual or potential presence of lead paint and/or lead-based paint hazards. C's PHE Ex. 27 at 12. It uses this "nature" of the violation to determine the appropriate "circumstances" and "extent" categories in the gravity-based penalty matrices. *Id.* In terms of the "circumstances" of violations, the ERP delineates six levels reflecting the probability of impairing a purchaser's or lessee's ability to assess the information required to be disclosed. Those violations which have a "high" probability of causing such impairment are classified as "Level 1 or 2 violations," violations having a medium probability of impairment are "Level 3 or 4 violations," and violations having a low probability of impairment are "Level 5 or 6 violations." C's PHE Ex. 27 at 12.

The ERP defines the "extent" as the "degree, range, or scope of the violation's potential for harm." C's PHE Ex. 27 at 12. It characterizes the extent of a violation as "Major" where

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[3] The ERP notes that under the Act's Disclosure Rule, both lessors and agents are responsible for complying with its requirements and that in determining the appropriate enforcement response "consideration should be given to the person(s)/entity(ies) with direct control over the disclosure activities." C's PHE Ex. 27 at 7 and 25-26 (Appendix A, defining "Responsible Party" under the ERP).

there is potential for "serious" damage to human health or the environment; "Significant" where there is the potential for a significant amount of damage to human health or the environment, and "Minor" where there is a potential for a "lesser" amount of damage to human health or the environment. C's PHE Ex. 27 at 13. Only two measurable factors are used in the ERP to determine the extent level of violations: (1) the age of the youngest child living in the target housing; and (2) whether a pregnant woman lives in the target housing. *Id.* Where a child under age six or a pregnant woman resides in the housing, the extent of the violation is always "major," when a child between the ages of 6 and 18 resides in the premises, the violation is always deemed "significant," and where the occupants are all over 18 years of age the extent is categorized as "minor." C's PHE Ex. 27 at 29 (Extent Category Matrix).

Finally, in terms of calculating the gravity-based penalty, the ERP notes that on a "case-by-case basis" EPA may seek a penalty for the economic benefit derived by a violator from delaying or avoiding compliance or through gaining an illegal competitive advantage from the violations. C's PHE Ex. 27 at 14.

As to the second stage of the process, the ERP sets forth specific circumstances under which EPA will adjust the gravity based penalty downward or upward in consideration of the violator's ability to pay/continue in business, history of prior violations, degree of culpability, and "such other factors as justice may require." C's PHE Ex. 27 at 17. It notes that upward adjustments are ordinarily made prior to issuance of the proposed penalty and downward adjustments are made thereafter, at which time the burden of persuasion of the appropriateness thereof is placed on the respondent. *Id.*

II. Complainant's Penalty Proposals

In the Complaint, EPA sought a total penalty of $30,320 from Respondent Mardaph II, LLC for 10 counts of violation (Counts 1, 2, 10, 11, 20, 21, 30, 31, 39, and 40); a total penalty of $26,840 from Respondent Mardaph III, LLC for 20 counts of violation (Counts 3-6, 12-15, 22-25, 32-35, and 41-44); and a total penalty of $91,000 from Respondent Vinnie Wilson for 47 counts of violation (Counts 1-47). However, in its Prehearing Exchange, Complainant only outlined its penalty calculations as to Respondent Vinnie Wilson, stating that although it "calculated a penalty for each Respondent, the total penalty for this matter is $91,090. Respondent Vinnie Wilson is the president and agent for Respondents Mardaph II and III, and U.S. EPA has no information that these entities have any resources other than the assets of Vinnie Wilson."[4] C's PHE at 9-10, n. 1.

In its Memorandum on Proposed Penalty ("Memorandum" or "Memo"), EPA acknowledged that after the Complaint was filed it "received information from Respondent

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[4] The Complaint alleged that Ms. Wilson was the lessor and/or agent for the lessor in regard to each lease at issue. Complaint ¶¶ 31-34.

Vinnie Wilson as to her ability to pay a civil penalty. . . . A review of all the submitted documents was performed by Cynthia Mack-Smeltzer, an accountant with U.S. EPA's Resource Management Division, Budget and Finance Section in Region 5. Based upon her review, Ms. Smeltzer concluded that Respondent Vinnie Wilson had a "***zero ability*** to pay a civil penalty." Memo at 7 (emphasis added). Nevertheless, EPA argues in its Memorandum that a "penalty is still warranted in this matter" specifically a $17,561 penalty, "or in the alternative, a minimum penalty of $3,561," proffering two reasons therefor. C's Memo at 1, 7, 10. First, it asserts that there are lead hazards in buildings owned or rented by Ms. Wilson which have contributed in whole or in part to a child's lead poisoning and thus need to be addressed, citing in support its PHE Ex. 29. If no penalty is imposed, Complainant suggests, Ms. Wilson "may fail to understand the seriousness of the violations and perhaps not be concerned with correcting her actions in the future," and a penalty would "reinforce that this is a serious matter that requires her attention and must be addressed." Memo at 7-8.

Second, EPA cites to the September 10, 1980 Guidelines for Assessment of Civil Penalty under Section 16 of the Toxic Substances Control Act (C's PHE Ex. 43), for the proposition that "[e]ven where the net income is negative, four percent of gross sales should still be used as the 'ability to pay' guideline, since companies with high sales will be presumed to have sufficient cash to pay penalties even where there have been net losses." Memo at 8, quoting C's PHE Ex. 43 at page 59775. EPA notes that as an individual and as president of the Respondent companies, Ms. Wilson received rental income from the buildings of $92,682 in 2006, $94,198 in 2007, and $97,911 in 2008, and reported a rental income of $5,945 per month for a total of $71,340 in 2009. In addition, she has equity in the buildings of $350,000. Memo at 9. Four percent of her average net income for those four years of $89,302 plus 4% of equity of $350,000 would give a penalty of $17,561, which EPA acknowledges "is not insignificant to a person of Respondent's means . . . [but] is not beyond her ability to pay." *Id.* EPA adds that it "would be willing to have the penalty paid in installments if this would help Respondent's cash flow."

IV. Penalty Analysis

The Consolidated Rules of Practice that govern these enforcement proceedings provides in pertinent part that:

> (a) The complainant has the burdens of presentation and persuasion . . . that the relief sought is appropriate. Following complainant's establishment of a prima facie case, respondent shall have the burden of presenting . . . any response or evidence with respect to the appropriate relief. The respondent has the burdens of presentation and persuasion for any affirmative defenses.
>
> (b) Each matter of controversy shall be decided by the Presiding Officer upon a preponderance of the evidence.

40 C.F.R. § 22.24.

As observed by the EAB, "the burdens of proof and other matters pertaining to this [the ability-to pay] penalty factor is well settled." *Donald Cutler*, 11 E.A.D. 622, 631, 2004 EPA App. LEXIS 29 *28-30 (EAB 2004). In regard to meeting its burdens on penalty, EPA generally makes out a prima facie case of appropriateness of the "relief sought" by demonstrating that it considered each of the statutory penalty factors and that the recommended penalty is supported by analyses of those factors. *Cutler*, 11 E.A.D. at 631-32, 2004 EPA App. LEXIS at 28-30. "If ability to pay is contested, a complainant must establish a prima facie case that a proposed penalty is nonetheless 'appropriate' by presenting . . . 'some evidence to show that it considered the respondent's ability to pay a penalty' . . . some *general* financial information regarding the respondent's financial status [that] can support the inference that the penalty assessment need not be reduced.'" *Cutler*, 11 E.A.D. at 632, 2004 EPA App. LEXIS at 28-30 (italics in original) quoting *New Waterbury, Ltd.*, 5 E.A.D. 529, 542 (EAB 1994). "Once this is done, the burden of production shifts to the respondent to rebut the complainant's evidence with specific information of its own that, 'despite its sales volume or apparent solvency, it cannot pay any penalty' . . . The complainant bears the ultimate burden of persuasion as to penalty appropriateness, so, if the respondent satisfies its burden of production, that burden shifts back to the complainant again, in this instance to 'rebut [the] respondent's contentions through rigorous cross-examination or through the introduction of additional information.'" *Id.*, quoting *Chempace Corp.*, 9 E.A.D. 119, 133 (EAB 2000).

It is clear that in this case ability to pay is contested. The Answer filed in this case stated: "Pro'se [sic] Respondent Wilson Respectfully states, that the statements of changes, of (her) income, financial position, and maintenance to (her) apartments and housing dwellings are clearly beyond the affordable financial ability to pay at this time . . . " In support thereof, Ms. Wilson submitted over the course of this proceeding various personal financial records including bank statements, tax returns, and a completed agency form entitled "EPA Financial Statement for Individuals." *See*, C's PHE at 16, C's PHE Exs. 4, 37 (2006-2008 federal tax returns), 38 (Financial Statement dated October 2009 with attachments), and 39 (bank statements, itemized monthly rent statements, mortgage statements for principal residence, retirement pension tax records). *See also*, Respondent's filings dated July 23, 2009, October 21, 2009, March 29, 2010 and various financial records attached thereto.

The record reflects that in response to Ms. Wilson's claim of inability to pay, EPA sought and obtained the opinion thereon of a financial expert of its choice, Ms. Mack-Smeltzer, an accountant with EPA Region 5's Resource Management Division, Budget and Finance Section. *See*, C's PHE Ex. 42, (Memorandum dated April 19, 2010 ("Expert Opinion")). In her Expert Opinion, Ms. Mack-Smeltzer states:

> I have reviewed the aforementioned documents to determine if Ms. Wilson has an ability to pay $91,090 in civil penalties. Other than a [minimal] per month pension/Social Security payment, Ms. Wilson's only source of income is from rental properties which is offset by higher rental expenses, thus creating a negative income per month.

> Ms. Wilson owns various rental properties. These properties have a substantial fair market value over 41 million. While there is some equity in these properties, it should not be considered a source for payment of the penalty. Industry standards and EPA practice caps affordable debt payments at 36% of income. Since Ms. Wilson has reported negative income for the last three years, it is not recommended that Ms. Wilson incur additional debt to pay the penalty. This will put her over the 36% ***and could force her into foreclosure or bankruptcy***.
>
> Overall, based upon the documentation provided, I believe that Ms. Wilson does not have the ability to pay ***any*** of the $91,090 penalty.

C's PHE Ex. 47 (emphasis added).

In its Prehearing Exchange dated November 20, 2009, Complainant identified the foregoing Expert Opinion as one of the exhibits it intended to introduce into evidence at hearing and Ms. Mack-Smeltzer as a witness it planned to call at hearing to testify, *inter alia*, "to provide her expert opinion and conclusions as to Respondent's financial status and ability to pay the penalty proposed in the Complaint."[5] C's PHE at 3, 5.

It is noted that the Expert Opinion of Ms. Mack-Smeltzer regarding Respondent Wilson's inability to pay seems well supported by the documents in the case file, including three years of tax returns prepared by a Certified Public Accountant (CPA), reflecting substantial negative yearly incomes well in excess of the total proposed penalty, if not multiples thereof, a letter from the CPA to Complainant indicating that Ms. Wilson "did not itemize deductions in 2008 because she had excessive losses that would already give her a zero income," a 2007 1099-R reflecting a nominal pension income, monthly bank statements as recent as March 2010 reflecting nominal sums on account, and correspondence dated August 20, 2008 from a law firm indicating that Ms. Wilson has a "large outstanding arrearage" with it, as a result of which it is no longer interested in representing her and has withdrawn as the resident agent for the Respondent corporations. *See*, C's PHE Exs. 37-39, 43.

In its Memorandum, Complainant asserts that despite the foregoing, Ms. Wilson has the ability to pay at least a portion of the penalty, and EPA rests this assertion on the single sentence

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[5] EPA caveated such representation noting that "[a]s of the date of this pre-hearing exchange, this review of Respondent Ms. Wilson's ability to pay is not complete pending receipt of additional documents from Respondent. U.S. EPA may supplement Ms. Mack's testimony and exhibit list in its rebuttal prehearing exchange to address and include any additional documents provided by Respondents." C's PHE at 3-4. Further, EPA stated that it "reserves the right not to call any of the above-listed witnesses at hearing, particularly Ms. Mack if Respondent fails to provide the additional requested documents." C's PHE at 4. As noted above, Respondents did not file a Prehearing Exchange, EPA never filed a rebuttal exchange, no hearing was held, and liability was entered based upon Respondent's default.

from EPA's September 10, 1980 Guidelines for Assessment of Civil Penalty under Section 16 of the Toxic Substances Control Act (C's PHE Ex. 43) that: "[e]ven where the net income is negative, four percent of gross sales should still be used as the 'ability to pay' guideline, since companies with high sales will be presumed to have sufficient cash to pay penalties even where there have been net losses." Memo at 8, quoting C's PHE Ex. 43 at page 59775. As Respondent is an individual, Complainant offers as evidence of her "gross sales" the fact she receives gross yearly rental income of over $70,000 and has $350,000 in equity in real property.

Such citation is unhelpful. First, it must be noted that the Guidelines being cited by Complainant are EPA's Penalty Policy for violations of the PCB (polychlorinated biphenyls) regulations. C's PHE Ex. 43. As evidenced by the Guidelines, PCBs are hazardous chemicals used by businesses primarily as coolants and insulating fluids for transformers and capacitors and their manufacture, handling, storage, release are strictly regulated. *Id.* Due to the risk associated with PCBs and extensive clean-up costs related thereto, regulatory violations are subject to a penalty of up to $25,000 a day. *Id.* Thus, the parties and violations subject to such penalty guidelines are substantially different from those at issue here.

Second, read in context, the PCB Guidelines' discussion of ability to pay does not support Complainant's position as it states:

> Essentially, however, a firm can pay **up to** the point where it can no longer do business. However, it is evident that Congress, by inserting these two factors into the Act, for most cases did not intend that TSCA civil penalties present so great a burden as to pose the threat of destroying, or even severely impairing, a firm's business. Measuring a firm's ability to pay a cash penalty, without ceasing to be operable, can be extremely complex. The focus is on the solvency of the firm. Rather than performing extensive financial analysis of a firm, which would take an unreasonable effort on the part of both the Agency and the firm, it is believed that a year's net income, as determined by a fixed percentage of total sales, will generally yield an amount which the firm can afford to pay. The average ratio of net income to sales level for U.S. manufacturing in the past five years is approximately five percent (1978 Economic Report of the President). Since small firms are generally slightly less profitable than average sized firms, and since small firms are the ones most likely to have difficulty paying TSCA penalties, the guideline is reduced to four percent. Even where the net income is negative, four percent of gross sales should still be used as the "ability to pay" guideline, since companies with high sales will be presumed to have sufficient cash to pay penalties even where there have been net losses. . . . If the firm raises the issue of inability to pay in its answer, or in the course of settlement discussions, the four percent guideline discussed above should be the model to follow. The firm should be asked to bring appropriate documentation to indicate what their sales have been, such as tax returns, financial statements, etc. If the proposed penalty exceeds four percent of total sales, the penalty may be reduced to an affordable level. There may be some cases where a firm argues that it cannot afford to pay

> even though the penalty as adjusted does not exceed four percent of sales. A variety of factors, too complex to discuss here, might require such further adjustment to be made. In complex cases, the agency may need to rely on a management division economist or an accountant to analyze the firm's ability to pay and, on a case-by-case basis, to further reduce the proposed penalty.

C's PHE Ex. 43 at 59775 (emphasis added).

In this case, where the Respondent Wilson was not a "firm," and had no "gross sales," Complainant had an accountant analyze her ability to pay based upon the specific facts of this case, and its accountant determined that payment of a penalty of any amount would severely impair or destroy Respondent Vinnie Wilson and her business. To nevertheless impose a penalty under such circumstances, the PCB Guidelines suggest, would be contrary to those Guidelines *and TSCA's legislative intent.*

Moreover, the ERP specifically applicable to the Act and the Disclosure Rule violations here suggests the same conclusion in that it explicitly states that "EPA generally will not request penalties that are clearly beyond the financial means of the violator," qualified only by the statement that "in appropriate circumstances" "may [it] seek a penalty that might prevent a violator from continuing in business. For example, [where a violator] has refused to correct a serious violation or . . . has a long history of violations." C's PHE Ex. 27 at 17-18. There is no evidence in the case file that Respondents were requested to correct past violations. Moreover, in its Prehearing Exchange, EPA indicated that it "does not believe Respondents have a history of prior violations of Section 1018" and indicates that it did not increase the initial gravity-based penalty based upon any prior history of violations. C's PHE at 17. As such, none of the "appropriate circumstances" for seeking a penalty which might prevent Ms. Wilson from continuing in business as set forth in the applicable ERP exist in this case.

In sum, this Tribunal understands the frustrations and concerns EPA has in regard to an essentially judgment-proof violator, particularly one who has an on-going obligation to comply with the Act and the Disclosure Rule and where there is evidence of actual injury to a child from lead exposure. However, EPA has simply not met its requisite burdens of proof or persuasion in this case as the preponderance of the evidence in the record demonstrates that Respondents do not have the ability to pay a penalty of any amount. Therefore, no penalty is being imposed for the 47 violations upon which Respondents were found liable in this action.

ORDER

1. Taking into account Respondents' inability to pay and/or ability to continue in business, a civil penalty of zero ($0) is assessed against Respondents for their violations of the Residential Lead-Based Paint Hazard Reduction Act of 1992, 42 U.S.C. §§ 4851 *et seq.* and the regulations promulgated thereunder upon which they were found liable in the prior Decision and Order on Default dated April 15, 2010.

2. Pursuant to 40 C.F.R. §22.27(c), this Initial Decision shall become a final order forty-five (45) days after its service upon the parties and without further proceedings unless: (1) a party moves to reopen the hearing within twenty (20) days after service of this Initial Decision pursuant to 40 C.F.R. § 22.28(a); (2) an appeal to the Environmental Appeals Board is taken within thirty (30) days after this Initial Decision is served upon the parties; or (3) the Environmental Appeals Board elects, upon its own initiative, to review this Initial Decision, pursuant to 40 C.F.R. §22.30(b).

Susan L. Biro
Chief Administrative Law Judge

Date: June 17, 2010
Washington, D.C.

I certify that the foregoing **Initial Decision And Order On Penalty**, dated June 17, 2010, was sent this day in the following manner to the addressees listed below.

Maria Whiting-Beale
Staff Assistant

Dated: June 17, 2010

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