

# Professional Contract Sterilization Inc.

## CAA - Base Policy

**Penalty First Drafted:** 2-Jun-22

**Amended:** 5-Oct-22

**Amended:** 9-Jan-23

**By:** Darren Fortescue Senior Enforcement Coordinator Air Compliance Section

**Reason:** To reconcile the language used in the Penalty Policy to that used in the worksheet and to correct the gravity adjustment cells (Note: this did not adjust the final penalty)

**Reason:** To correct the start date of violation 1. This correction does not adjust final penalty amount.

**Penalty: \$126,781**

Estimated Date of Filing	6/6/22	Violator Size	\$5,000
5 years back from date of Filing	6/6/17	Preliminary Gravity	\$100,651
		Total Gravity	\$105,651
		Degree of Willfulness or Negligence	20%
		Economic Benefit	\$0
		Litigation Risk	
		Final Penalty	\$126,781

Count	CAA Penalty Policy / Appendix	Inflation Rate	Violation Description	Regulation(s)	Violation Classification	Begin Date of Violation	Effective Begin Date of Violation	End Date of Violation	Total Duration of Violation (months)	Importance to Regulatory Scheme	Actual or Possible Harm (includes level of violation and sensitivity to environment / toxicity of pollutant)	Duration Penalty	Manual Adjustment to Duration	Pre-Inflation Total	Inflation*	Inflation-Adjusted Total	Comments
1	Policy	2.01302	Failure to respond to a reporting requirement issued by EPA (ICR).	Section 114(a)(1) of the Clean Air Act, 42 U.S.C. § 7414(a)(1)	Reporting	11/19/21	11/19/21	7/1/22	7	\$15,000		\$15,000		\$30,000	\$30,391	\$60,391	On September 13, 2021, EPA issued an Information Collection Request letter to PCS to gather information to assist in rule making. PCS has failed to submit a response to this ICR.  <i>This was submitted on 07/06/2022</i>
2	Policy	2.01302	Failure to respond to a reporting requirement issued by EPA (114TO).	Section 114(a)(1) of the Clean Air Act, 42 U.S.C. § 7414(a)(1)	Reporting	5/7/22	5/7/22	6/7/22	1	\$15,000		\$5,000		\$20,000	\$20,260	\$40,260	On April 7, 2022 EPA issued PCS a Reporting Requirement/Testing Order under Section 114(a)(1) of the Clean Air Act. The Testing Order required that PCS submit to EPA a Test Plan/Protocol within 30 days of receipt. PCS has failed to submit a Plan/Protocol.  <i>This was submitted on 06/07/2022</i>
3	Policy	2.01302					6/6/17		0.0			\$0		\$0	\$0	\$0	
4	Policy	2.01302					6/6/17		0.0			\$0		\$0	\$0	\$0	
5	Policy	2.01302					6/6/17		0.0			\$0		\$0	\$0	\$0	
6	Policy	2.01302					6/6/17		0.0			\$0		\$0	\$0	\$0	
7	Policy	2.01302					6/6/17		0.0			\$0		\$0	\$0	\$0	
8	Policy	2.01302					6/6/17		0.0			\$0		\$0	\$0	\$0	
9	Policy	2.01302					6/6/17		0.0			\$0		\$0	\$0	\$0	
10	Policy	2.01302					6/6/17		0.0			\$0		\$0	\$0	\$0	
															<b>Preliminary Gravity</b>	<b>\$40,260</b>	

Unless otherwise footnoted, all calculations are based on the Clean Air Act Stationary Source Civil Penalty Policy - October 25, 1991

Notes:	
<b>Violator Size:</b>	Assume net worth is between \$100,001 - \$1,000,000. Size of Violator = \$5,000.
<b>Economic Benefit:</b>	No economic benefit has been assessed for failure to respond to the reporting requirement.
<b>Cooperation:</b>	
<b>Litigation Risk:</b>	