PENALTY COMPUTATION WORKSHEET SUBJECT TO FINAL APPROVAL

Violator's Name:	North Florida Shipyards (EPA ID #FLD 093 598 548)					
Address:	2060 E. Adams Street, Jacksonville, FL 32202					
Name of Department Staff Responsible for the Penalty Computations:						
Luke S. Lewis						
Date:	10/5/2018					

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	Violation Type	RCRA Guideline	ELRA Schedule	ENVIRON- MENTAL Harm	Extent of Dev.	Matrix Amount	Adjust- ments	Total
1	40 CFR 279.22(c): Used oil containers not labeled "Used Oil."	UO146		3+2+0+1+0=6 Minor	Always Major	\$850		\$850
2	40 CFR 262.17(a)(5)(i)(C): Containers did not have accumulation start dates.	HW4		4+5+0+1+0=10 Minor	Major for no shipments offsite	\$3,190		\$3,190
3*	62-730.160(4), FAC: Inadequate aisle space.	HW15		4+8+0+1+0=13 Moderate	Major for 3 deep or more	\$10,000*		\$10,000*
4	40 CFR 262.17(a): More than 90 days without shipment.	HW217		4+8+0+1+0=13 Moderate	Moderate for 30-180 days over accum. time	\$9,210	\$384	\$9,594
5	40 CFR 262.17(a)(5)(i)(A): Container not properly labeled.	HW5		4+2+0+1+0=7 Minor	Minor for 0- 10% not labeled	\$430		\$430
6	40 CFR 279.22(d): Used oil releases.	UO140		3+2+8+2+0=15 Moderate	Always Major	\$3,900	\$87	\$3,987
7	40 CFR 262.15(a)(4): Satellite containers not kept closed.	HW10		4+2+0+1+0=7 Minor	Always Major	\$3,190		\$3,190
8	40 CFR 262.15(a)(5): Satellite containers not properly labeled.	HW6		Always Minor	Always Minor	combined with #5		\$0
9	40 CFR 273.13(d)(1): Container of universal waste was not kept closed.	UW37		Minor for no release	Minor for <10 bulbs	combined with #7		\$0
10	40 CFR 273.14(e): Container of universal waste was not properly labeled.	UW38		Always Minor	Minor for <10 bulbs	combined with #5		\$0
11	62-710.401(6), FAC: Used oil containers not on secondary con./open con.	UO144		3+8+0+1+0=12 Minor	Always Major	\$850	\$105	\$955
12	40 CFR 262.42(a)(2): No signed return copy or exception report.	HW113		4+5+0+1+0=10 Minor	Moderate for LQG to fail to file	\$1,420		\$1,420

Violation Type	RCRA Guideline	ELRA Schedule	ENVIRON- MENTAL Harm	Extent of Dev.	Matrix Amount	Adjust- ments	Total
40 CFR 262.20(a): Mismanaging and 13 evaporating hazardous waste.	HW117		4+5+0+1+0=10 Minor	Major for LQG with no docs.	\$3,190	\$2,844	\$6,034
40 CFR 262.11: Not making hazardous waste 14 determinations.	HW216		4+5+0+2+0=11 Minor	Always Major	\$3,190	\$23.70	\$3,214
40 CFR 262.251: Minimization of the possibility of fire or release 15 of hazardous waste.	HW51		4+1+6+1+0=12 Minor	Major for LQG	\$3,190	Included with #6	\$3,190
40 CFR 273.15(c): Container of universal waste 16 was not dated.	UW42		Minor for SQH	Always Moderate	combined with #2		\$0
40 CFR 262.252(c): Not all the required 17 equipment was present.	HW52		4+2+0+1+0=7 Minor	Minor for some equipment	\$430	\$37.50	\$468
3** Note: Violation #3 penalty amount revised IAW DEP 923 Directive, paragraph #6. Please see attached Directive.				Subtotals:	\$43,040	\$3,481.20	\$46,521
	Total Penalties for all violations:			\$46,521			
					Departi	ment Costs:	\$500
Kythy				January 14, 2019			
Gregory, J. Strong, District	Director			· -	Date		
\mathcal{J}_{i}							
Michael Folis					01/15/	2019	
Michael Halpin				· -	Date		
Assistant Deputy Secretary, Regulatory							
Peer Reviewed by Division	n: Yes (X) N	No() N/A	()				

T = Corporate Tax Rate = 21% (in 2018) I = Interest rate charged by IRS for delinquent accounts = 3% (in 2018) Avoided Costs (AC) for Violation 13: Violation 13: The facility managed HW shop rags as non-HW oily shop rags & evaporated a small amount of liquid paint. Cost estimate to properly disposing of HW shop rags: \$300 for one 55-gallon drum of HW shop rags every 90 days for 3 years = 4 drums x 3yrs x \$300 = \$3,600. Facility added paint in open containers to existing HW drum. AC = \$3,600(0.79) = \$2,844 Delaved Costs (DC) for Violations 4, 6, 11, 14, 15 and 17: Violation 4: The facility had 32 drums of HW that had accumulated for >90 days in the HWAA. Cost estimate of properly managing 25 5-gallon drums: \$400 per drum (ayg cost estimated) x 32 = \$12,800 DC = \$12,800(0.03) = \$384 Violations 6, 15: The facility did not cleanup 3 used oil (UO) spills, a spill of spent diesel & a spill of spent blast media. Cost estimate of inhouse labor to cleanup & properly manage waste from 5 releases: UO - \$250 labor x 3 spill sties = \$750; \$300 disposal per non-HW drum x 6 drums = \$1,800. Other spills - \$25 labor x 2 sites = \$50; \$150 per 1/2 drum disposal x 2 = \$300. Sum: \$750 + \$1,800 + \$50 + \$300 = \$2,900 (0.03) = \$3.500 DC = \$2,900(0.03) = \$87 Violation 11: The facility did not have secondary containment for 11 drums & 4 totes of UO. Cost estimate for secondary containment for 11 drums and four totes: \$300 per 4-drum spill pallet x 3 = \$900; \$1,300 per 2-tote spill pallet x 2 = \$2,600. Sum: \$900 + \$2,600 = \$3,500 DC = \$3,500 DC	PART II - MULTI-DAY PENALTIES AND ADJUSTMENTS	
Good faith after discovery: Justification: Good faith after discovery: Justification: History of non-compliance: Justification: Economic benefit of non-compliance: Befer to descriptions and calculations below. S3,481.20 Justification: Refer to descriptions and calculations below. Ability to pay: Justification: Total Adjustments: EBB - AC(1-T) + DC(1) = \$2.844 + \$384 + \$87 + \$105 + \$23.70 + \$37.50 = \$3.481.20 AC - Avoided Costs - expenditures audified by violator's failure to comply (Operating and Maintenance costs) DC - Delayed Costs - expenditures deferred by violator's failure to comply (Capital Costs) T - Corporate Tax Rate = 21% (in 2018) F - Interest rate charged by IRS for delinquent accounts = 3% (in 2018) Avoided Costs (AC) for Violation 13: Violation 13: The facility managed HW shop rags: \$300 for one \$5-gallon drum of HW shop rags every 90 days for 3 years = 4 drums x 3yms x \$300 = \$5.460. AC = \$3,600(0.79) = \$2.844 Delayed Costs (DC) for Violations 4, 6.11.14.15 and 17: Violation 3: The facility had 32 drums of HW that had accumulated for >90 days in the HWAA. Cost estimate of properly managing 25.5-gallon drums: \$400 per drum (avg cost estimated) x 32 = \$12.800 DC = \$12.800(0.03) = \$384 Violation 6.15: The facility did not cleanup 3 used oil (Uo) spills, a spill of spent diesel & a spill of spent blast media. Cost estimate for many accounts and properly managing per non-HW drum x 6 drums = \$1,800. Other spills - \$25 labor x 2 sites = \$50; \$150 per 1/2 drum disposal x 2 = \$300. Sum: \$750 + \$150.00 - \$2,000(0.03) = \$384 Violation 11: The facility did not have secondary containment for 11 drums & 4 totes of UO. Cost estimate for secondary containment for 11 drums and four tutes: \$300 per 4-drums spill pallet x 3 = \$25,800. Sum: \$750 + \$25,000(0.03) = \$380. Violation 11: The facility did not have secondary containment for 11 drums & 4 totes of UO. Cost estimate for secondary containment for 11 drums and four tutes: \$300 per 4-drum spill pallet x 3 = \$200.00 Cost estimate for se	Adjustments	Amoun
Justification: Good faith after discovery: Justification: History of non-compliance: Justification: Refer to descriptions and calculations below. S3,481.20 Justification: Refer to descriptions and calculations below. S3,481.20 Justification: Total Adjustments: S3,481.20 AC - Avoided Costs - expenditures unlified by violator's failure to comply (Operating and Maintenance costs) DC - Delayed Costs - expenditures deferred by violator's failure to comply (Operating and Maintenance costs) DC - Delayed Costs - expenditures deferred by violator's failure to comply (Operating and Maintenance costs) DC - Delayed Costs - expenditures deferred by violator's failure to comply (Operating and Maintenance costs) DC - Delayed Costs (AC) for Violation 13: Violation 13: The facility managed HW shop rags as non-HW oily shop rags & evaporated a small amount of liquid paint. Cost estimate of properly disposing of HW shop rags: \$300 for one 55-gallon drum of HW shop rags every 90 days for 3 years = 4 drums x 3yrs x \$300 = \$3,600. Facility added paint in open containers to existing HW drum. AC = \$3,600(0.79) = \$2,844 Delayed Costs (DC) for Violations 4, 6, 11, 14, 15 and 17: Violation 4: The facility had 32 drams of HW that had accumulated for >90 days in the HWAA. Cost estimate of properly managing 32 55-gallon drums: \$400 per drum (avg cost estimated) x 32 = \$12,800 DC = \$12,800(0.03) = \$387 Violation 5: The facility id not cleamp 3 weed oil U/O 39/HIs, as pill of spent blast media. Cost estimate of inhouse labor to cleanup & properly manage waste from 5 releases: U/O - \$250 labor x 3 spill sites = \$750; \$300 disposal per non-HW drum x of crums = \$1,800. Other spills - \$25 ibor x 2 sites = \$50, \$150 per 1/2 drum disposal x 2 = \$300. Sum: \$750 + \$100 = \$1,800(0.03) = \$165 Violation 1: The facility did not have secondary containment for 11 drums and floor of secondary containment for 15 drums & 4 totes of U/O. Cost estimate for secondary containment for 15 drums and solution of secondary containment for 15 drum		·
Good faith after discovery: Justification: History of non-compliance: Lostification: Economic benefit of non-compliance: Refer to descriptions and calculations below. S3,481.20 Justification: Refer to descriptions and calculations below. Ability to pay: Justification: Total Adjustments: \$3,481.20 EB = AC(1-T) + DC(1) = \$2,844 + \$384 + \$87 + \$105 + \$23.70 + \$37.50 = \$3,481.20 AC = Avoided Costs - expenditures nullified by violator's failure to comply (Operating and Maintenance costs) DC = Delayed Costs - expenditures defirmed by violator's failure to comply (Operating and Maintenance costs) T = Corporate Tax Rate = 21% (in 2018) 1 = Interest rate charged by IRS for delinquent accounts = 3% (in 2018) Avoided Costs (AC) for Violation 13: Violation 13: The facility managed HW shop rags as non-HW oily shop rags & evaporated a small amount of liquid paint. Cost estimate of properly disposing of HW shop rags: \$300 for one \$5*-gallon drum of HW shop rags every 90 days for 3 years = 4 drums x 3yrs x \$300 = \$3.00. Facility added paint in open containers to existing HW drum. AC = \$3,600(0.79) = \$2,844 Delayed Costs (AC) for Violations 4, 6, 11, 14, 15 and 17: Violation 4: The facility had 32 drums of HW that had accumulated for >90 days in the HWAA. Cost estimate of properly managing 25.5*-gallon drums: \$400 per drum (avg cost estimated) x 32 = \$12,800 DC = \$12,800(0.30) = \$3,800 Lost = \$1,800 + \$2,000 + \$2	-	-
Justification: Economic benefit of non-compliance: Economic benefit of non-compliance: Refer to descriptions and calculations below. S3,481.20 Justification: Refer to descriptions and calculations below. S3,481.20 Ability to pay: Justification: Total Adjustments: S3,481.20 AC = Avoided Costs = expenditures multified by violator's failure to comply (Operating and Maintenance costs) DC = Delayed Costs = expenditures deferred by violator's failure to comply (Capital Costs) T = Corporate Tax Rate = 21% (in 2018) I = Interest rate charged by IRS for delinquent accounts = 3% (in 2018) Avoided Costs (AC) for Violation 13: Violation 13: The facility managed HW shop rags as non-HW oily shop rags & evaporated a small amount of liquid paint. Cost estimate of properly disposing of HW shop rags. S300 for one 55-gallon drum of HW shop rags every 90 days for 3 years = 4 drums x 3yrs x 3300 = \$3,000. Facility added paint in open containers to existing HW drum. AC = \$3,600(0.79) = \$2,844 Delayed Costs (DC) for Violations 4, 6, 11, 14, 15 and 17: Violation 4: The facility had 32 drums of HW that had accumulated for >90 days in the HWAA. Cost estimate of properly managing 25 55-gallon drums: \$400 per drum (avg cost estimated) x 32 = \$12,800 DC = \$12,800(0.03) = \$3.844 Delayed Costs (DC) for Violations 4, 6, 11, 14, 15 and 17: Violation 4: The facility had 32 drums of HW that had accumulated for >90 days in the HWAA. Cost estimate of properly managing 25 55-gallon drums: \$400 per drum (avg cost estimated) x 32 = \$12,800 DC = \$12,800(0.03) = \$3.844 Delayed Costs (DC) for Violations 4, 6, 11, 14, 15 and 17: Violations 6, 15. The facility did not cleanup 3 used oi (UO) splits, a spill of spent dises 4 as spill of spent blast media. Cost estimate of inhouse labot to cleanup & properly manage waste from 5 releases: UO - \$250 labor x 3 spill sites = \$750; \$300 disposal per non-HW drum x 6 drums = \$18,00. Other spills - \$25,000 per spill sites = \$750; \$300 disposal per non-HW drum x 6 drums = \$18,00. Other spills	-	- \$(
History of non-compliance: Justification: Refer to descriptions and calculations below. \$3,481.20 Justification: Refer to descriptions and calculations below. \$3,481.20 Justification: Total Adjustments: \$3,481.20 Justification: Total Adjustments: \$3,481.20 Total Adjustments: Total Adjustments: \$3,481.20 EB = AC(1-T) + DC(1) = \$2,844 + \$384 + \$87 + \$105 + \$23.70 + \$37.50 = \$3,481.20 AC = Avoided Costs - expenditures nellified by violator's failure to comply (Operating and Maintenance costs) DC = Delayed Costs - expenditures deferred by violator's failure to comply (Capital Costs) T = Corporate Tax Rate = 21% (in 2018) 1 = Interest rate charged by IRS for delinquent accounts = 3% (in 2018) Avoided Costs (AC) for Violation 13: Violation 13: Violation 13: The facility managed HW shop rags: \$300 for one \$55-gallon drum of HW shop rags every 90 days for 3 years = 4 drums x 3yrs x \$300 = \$3,000. Facility added paint in open containers to existing HW drum. AC = \$3,600(0.79) = \$2,844 Delayed Costs (DC) for Violations 4, 6, 11, 14, 15 and 17: Violation 4: The facility had 32 drums of HW that had accumulated for >90 days in the HWAA. Cost estimate of properly managing 32 \$5-gallon drums: \$400 per fum (say cost estimated) x32 = \$12,800 DC = \$12,800(0.93) = \$384 Violations 6, 15: The facility did not cleanup 3 used oil (UO) spills, a spill of spent diesed & a spill of spent blast media. Cost estimate to inhouse labor to cleanup & properly manage waste from 5 releases: UO - \$250 labor x 3 spill sites = \$750: \$300 disposal per non-HW drum x 6 drums = \$1,800 . Other spills = \$25 labor x 2 sites = \$50; \$150 per 1/2 drum disposal x 2 = \$300. Sum: \$750 + \$1,800 - \$3,500 . DC = \$3,500(0.03) = \$187 Violation 11: The facility did not have secondary containment for 11 drums & 4 totes of UO. Cost estimate for secondary containment for 12 drum spills and proper = \$100 x 2 drums = \$200 x 2 d		-
Dustification: Refer to descriptions and calculations below. \$3,481.20		- \$(
Economic benefit of non-compliance: Refer to descriptions and calculations below. Refer to descriptions and calculations below. Stability to pay: Justification: Total Adjustments: S3,481.20 EB = AC(1-T) + DC(1) = \$2,844 + \$384 + \$87 + \$105 + \$23.70 + \$37.50 = \$3,481.20 AC = Avoided Costs = expenditures nullified by violator's failure to comply (Operating and Maintenance costs) DC = Delayed Costs = expenditures nullified by violator's failure to comply (Capital Costs) T = Corporate Tax Rate = 21% (in 2018) = Interest rate charged by IRS for delinquent accounts = 3% (in 2018) = Interest rate charged by IRS for delinquent accounts = 3% (in 2018) Avoided Costs (AC) for Violation 13: Violation 13: The facility managed HW shop rags as non-HW oily shop rags & evaporated a small amount of liquid paint. Cost estimate of properly disposing of HW shop rags: \$300 for one 55-gallon drums of HW shop rags every 90 days for 3 years = 4 drums x 3yrs x \$300 = \$3,600. Facility added paint in open containers to existing HW drum. AC = \$3,600(0.79) = \$2,844 Delayed Costs (DC) for Violations 4,6,11,14,15 and 17. Violation 4: The facility had 32 drums of HW that had accumulated for >90 days in the HWAA. Cost estimate of properly manage wate setimate of himbous labor to cleanup & properly manage wate from 5 releases: Uc - \$250 albor x 3 spill sites = \$750; \$300 disposal per non-HW drum x 6 drums = \$1,800. Other spills - \$25 labor x 2 sites = \$50; \$150 per 1/2 drum disposal x 2 = \$300. Sum: \$750 + \$1,800 + \$50 + \$300 = \$2,900 DC = \$2,900(0.03) = \$87 Violation 14: The facility did not cleanup & properly manage wate from 5 releases: Uc - \$250 albor x 3 spill sites = \$750; \$300 disposal per non-HW drum x 6 drums = \$1,800. Other spills - \$25 labor x 2 sites = \$50; \$150 per 1/2 drum disposal x 2 = \$300. Sum: \$750 + \$1,800 + \$500 + \$2,000 = \$3,000 DC = \$1,2800(0.03) = \$105 Violation 14: The facility did not have secondary containment for 11 drums & 4 totes of UO. Cost estimate for secondary containment for 11 drums and fo		-
Justification: Ability to pay: Justification: Total Adjustments: \$3,481.20 EB = AC(1-T) + DC(1) = \$2,844 + \$384 + \$87 + \$105 + \$23.70 + \$37.50 = \$3,481.20 AC = Avoided Costs = expenditures nullified by violator's failure to comply (Operating and Maintenance costs) DC = Delayed Costs = expenditures deferred by violator's failure to comply (Capital Costs) T = Corporate Tax Rate = 21% (in 2018) I = Interest rate charged by IRS for delinquent accounts = 3% (in 2018) Avoided Costs (AC) for Violation 13: Violation 13: The facility managed HW shop rags: \$300 for one 55-gallon drum of HW shop rags every 90 days for 3 years = 4 drums x 3yrs x \$300 = \$3,600. Facility added paint in open containers to existing HW drum. AC = \$3,600 (D. Facility added paint in open containers to existing HW drum. AC = \$3,600 (T. Facility had 52 drums of HW that had accumulated for >90 days in the HWAA. Cost estimate of properly managing 25 5-gallon drums: \$400 per drum (avg cost estimated) x 32 = \$12,800 (DC = \$12,800(0.03) = \$384 Delayed Costs (DC) for Violations 4, 6, 11, 14, 15 and 17: Violations 6, 15: The facility had 52 drums of HW that had accumulated for >90 days in the HWAA. Cost estimate of properly managing 25 5-gallon drums: \$400 per drum (avg cost estimated) x 32 = \$12,800 (DC = \$12,800(0.03) = \$384 Violations 6, 15: The facility did not cleanup 3 used oil (UO) spills a spill of spent disease 4 a spill of spent blast media. Cost estimate of inhouse labor to cleanup & properly manage waste from 5 releases: UO - \$250 labor x 3 spill sites = \$750; \$300 disposal per non-HW drum x 6 drums = \$1,800. Other spills - \$25 labor x 2 sites = \$50; \$150 per 1/2 drum disposal x 2 = \$300. Sum: \$750 + \$1,800 + \$2,600 = \$3,500 (DC = \$2,900(0.03) = \$87 Violation 11: The facility did not have required equipment for 11 drums & 4 totes of UO. Cost estimate for secondary containment for 11 drums and four totes: \$300 per 4-drum spill pallet x 3 = \$900; \$1,300 per 2-tote spill pallet x 2 = \$2,600. Sum: \$700 + \$1,000 + \$1,000 + \$1,000		\$3,481.20
Ability to pay: Justification: Total Adjustments: \$3,481.20 EB = AC(1-T) + DC(1) = \$2,844 + \$384 + \$87 + \$105 + \$23.70 + \$37.50 = \$3.481.20 AC = Avoided Costs - expenditures utilified by violator's failure to comply (Operating and Maintenance costs) DC = Delayed Costs - expenditures deferred by violator's failure to comply (Capital Costs) T = Corporate Tax Rate = 21% (in 2018) 1 = Interest rate charged by IRS for delinquent accounts = 3% (in 2018) Avoided Costs (AC) for Violation 13: Violation 13: The facility managed HW shop rags: \$300 for one \$55-gallon drum of HW shop rags every 90 days for 3 years = 4 drums x 3yrs x \$300 = \$3.600. Facility added paint in open containers to existing HW drum. AC = \$3.600(0.79) = \$2.844 Delayed Costs (DC) for Violations 4, 6, 11, 14, 15 and 17: Violation 4: The facility had 32 drums of HW that had accumulated for >90 days in the HWAA. Cost estimate of properly managing 25 25-gallon drums: \$400 per drum (avg cost estimated) x 32 = \$12.800 DC = \$12.800(0.03) = \$384 Violation 6, 15: The facility did not cleanup 3 used oil (UO) spills, a spill of spent dicasel & a spill of spent blast media. Cost estimate of inhouse labor to cleanup & properly manage waste from 5 releases: UO - \$250 labor x 3 spill sites = \$750; \$300 disposal per non-HW drum x 6 drums = \$1,800. Other spills = \$25 labor x 2 sites = \$50; \$150 per 1/2 drum disposal x 2 = \$300. Sum: \$750 + \$1,800 + \$50.00 = \$3.000 DC = \$3.000(0.03) = \$87 Violation 11: The facility did not have secondary containment for 11 drums & 4 totes of UO. Cost estimate for secondary containment for 11 drums and four totes: \$300 per 4-drum spill pallet x 3 = \$900; \$1,300 per 2-tote spill pallet x 2 = \$2,600. Sum: \$750 + \$1,000 + \$3.500 = \$3.500 DC = \$3.000(0.03) = \$37.50 Violation 14: The facility did not have required equipment near drums of HW in 2 areas. Cost estimate of 2 eyewash stations, a fire extinguisher and 2 spill kits: \$50 per eyewash x 2 = \$100; \$500 per spill kit x 2 = \$1,000; 1 fire extinguisher \$150. Sum: \$10	- 10	-
Justification: Total Adjustments: B3,481.20 FB = AC(I-T) + DC(I) = \$2,844 + \$384 + \$87 + \$105 + \$23.70 + \$37.50 = \$3,481.20 AC = Avoided Costs — expenditures millified by violator's failure to comply (Operating and Maintenance costs) DC — Delayed Costs — expenditures deferred by violator's failure to comply (Capital Costs) T — Corporate Tax Rate = 21 ye'' (in 2018) A voided Costs (AC) for Violation 13: Violation 13: The facility managed HW shop rags as non-HW oily shop rags & evaporated a small amount of liquid paint. Cost estimate of properly disposing of HW shop rags: \$300 for one 55-gallon drum of HW shop rags every 90 days for 3 years = 4 drums x 3yrs x \$300 = \$3,600. Facility added paint in open containers to existing HW drum. AC = \$3,600(0.79) = \$2,844 Delayed Costs (DC) for Violations 4. 6. 11. 14. 15 and 17: Violation 4: The facility had 32 drums of HW that had accumulated for >90 days in the HWAA. Cost estimate of properly managing 25 55-gallon drums: \$400 per drum (avg cost estimated x) 32 = \$12,800 DC = \$12,800(0.03) = \$384 Violation 4: The facility did not cleanup 3 used oil (UO) spills, a spill of spent diesel & a spill of spent blast media. Cost estimate of inhouse labor to cleanup & properly manage waste from 5 releases: Uo - \$250 labor x 3 spill sites = \$750, \$300 disposal per non-HW drum & 6 drums = \$1,800. Otter spills - \$251 abor x 2 sites = \$50; \$150 per 1/2 drum disposal x 2 = \$300. Sum: \$750 + \$1,800 + \$50 - \$300 - \$2,900 DC = \$2,900(0.03) = \$87 Violation 11: The facility did not have secondary containment for 11 drums & 4 totes of UO. Cost estimate for secondary containment for 11 drums and four totes: \$300 per 4-drum spill pallet x 3 - \$900; \$1,300 per 2-tote spill pallet x 2 - \$2,600. Sum: \$900 + \$2,600 - \$3,500 DC = \$3,500(0.03) = \$105 Violation 14: The facility did not have required equipment near drums of HW in 2 areas. Cost estimate of 2 eyewash shown in report = \$130 + \$210 + 40 - \$380; Waste in dumpster - TCLP analysis shown in report = \$130 x 2 drums=\$260; Sampling		- \$(
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Justification: \$ -	Number of days matrix amount is to be multiplied:	
	Justification:	\$ -
	Comments:	

PART III - OTHER ADJUSTMENTS MADE AFTER MEETING WITH THE RESPONSIBLE PARTY					
ADJUSTMENT	Dollar Amount				
Relative merits of the case:					
Resource Considerations:					
Other Justification:					
Date	Gregory J. Strong, District Director				