



McKenzie Tank Lines  
St. Marks Terminal  
February 28, 2007  
Page 2 of 5

**(b) Extent of Deviation**

**Minor**

In accordance with the Guidelines for Characterizing Used Oil Violations (1/24/2006), the Potential for Harm for not complying with the General Requirements for the storage of used oil filters less than three drums is **Minor**.

**\*\*RCRA PENALTY POLICY APPLIED for March 2007.**



**PENALTY COMPUTATION WORKSHEET**  
PART II - Multi-day Penalties and Adjustments

**ADJUSTMENTS**

**Dollar Amount**

Good faith/Lack of good faith prior to discovery: \_\_\_\_\_  
Justification: \_\_\_\_\_

Good faith/Lack of good faith after discovery: \_\_\_\_\_  
Justification: \_\_\_\_\_

History of non-compliance: \_\_\_\_\_  
Justification: \_\_\_\_\_

Economic benefit of non-compliance: No adjustment  
Justification: No economic benefit for the two violations cited.

Ability to pay: \_\_\_\_\_  
Justification: \_\_\_\_\_

Total Adjustments: \_\_\_\_\_

**MULTI-DAY PENALTIES**

**Dollar Amount**

Number of days adjustment factor(s) to be applied: \_\_\_\_\_

Total Dollar Amount: \_\_\_\_\_  
Justification: \_\_\_\_\_

OR

Number of days matrix amount is to be multiplied: \_\_\_\_\_  
Justification: \_\_\_\_\_

Total Adjusted Penalty: \$3,100  
Department Expenses: \$250

PENALTY COMPUTATION WORKSHEET

Part III - Other Adjustments Made After Meeting with the  
Responsible Party

ADJUSTMENTS:

Dollar Amount

Relative merits of the case:

\_\_\_\_\_

Resource considerations:

\_\_\_\_\_

Other justification:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_  
Richard Fancher  
District Director

\_\_\_\_\_  
Date