

### Exhibit 4.A

## Matrix Values for Determining the Gravity-Based Component of a Penalty

(Use for Violations that Occurred after March 15, 2004 through January 12, 2009)

Extent of Deviation from Requirement

		<i>Major</i>	<i>Moderate</i>	<i>Minor</i>	
Potential for Harm	<i>Major</i>	1,930	1,290	650	<i>Major</i>
	<i>Moderate</i>	970	650	320	<i>Moderate</i>
	<i>Minor</i>	260	130	70	<i>Minor</i>

NOTE: These amounts constitute the matrix value only. They are **not** the initial penalty target figure. The initial penalty target figure is calculated as follows:

$$\text{Initial Penalty Target Figure} = \text{Economic Benefit Component} + \left( \text{MATRIX VALUE} \times \text{Violator Specific Adjustment} \times \text{Environmental Sensitivity Multiplier} \times \text{Days of Noncompliance Multiplier} \right)$$

Note: Original values provided in Directive 9610.12, November 14, 1990 have been adjusted for inflation by multiplying by 1.2895, reflecting the 10% increase, and the 17.23% increase [1.10 x 1.1723 = 1.2895] in accordance with December 29, 2008 Amendments to EPA's Civil Penalty Policies to Implement the 2008 Civil Monetary Penalty Inflation Adjustment Rule (Effective January 12, 2009). Resulting values were rounded to the nearest whole number then rounded to the nearest 10.

[Directive 9610.12]

### Exhibit 4.B

## Matrix Values for Determining the Gravity-Based Component of a Penalty

(Use for Violations that Occurred after January 12, 2009 through December 6, 2013)

Extent of Deviation from Requirement

	<i>Major</i>	<i>Moderate</i>	<i>Minor</i>	
Potential for Harm	2,120	1,420	710	Major
	1,060	710	350	Moderate
	280	140	70	Minor

NOTE: These amounts constitute the matrix value only. They are **not** the initial penalty target figure. The initial penalty target figure is calculated as follows:

$$\text{Initial Penalty Target Figure} = \text{Economic Benefit Component} + \left( \text{MATRIX VALUE} \times \text{Violator Specific Adjustment} \times \text{Environmental Sensitivity Multiplier} \times \text{Days of Noncompliance Multiplier} \right)$$

Note: Original values provided in Directive 9610.12, November 14, 1990 have been adjusted for inflation by multiplying By 1.4163 reflecting the 10% increase, the 17.23% increase, and the 9.83% increase [1.10 x 1.1723 x 1.0983 = 1.4163] in accordance with December 6, 2013 Amendments to EPA’s Civil Penalty Policies to Implement the 2013 Civil Monetary Penalty Inflation Adjustment Rule (Effective December 6, 2013). Resulting values were rounded to the nearest whole number then rounded to nearest 10.

[Directive 9610.12]

### Exhibit 4.C

## Matrix Values for Determining the Gravity-Based Component of a Penalty

(Use for Violations that Occurred after December 6, 2013 through November 2, 2015)

Extent of Deviation from Requirement

		<i>Major</i>	<i>Moderate</i>	<i>Minor</i>	
Potential for Harm	<i>Major</i>	2,230	1,490	740	Major
	<i>Moderate</i>	1,110	740	370	Moderate
	<i>Minor</i>	300	150	70	Minor

NOTE: These amounts constitute the matrix value only. They are **not** the initial penalty target figure. The initial penalty target figure is calculated as follows:

$$\text{Initial Penalty Target Figure} = \text{Economic Benefit Component} + \left( \text{MATRIX VALUE} \times \text{Violator Specific Adjustment} \times \text{Environmental Sensitivity Multiplier} \times \text{Days of Noncompliance Multiplier} \right)$$

Note: Original values provided in Directive 9610.12, November 14, 1990 have been adjusted for inflation by multiplying By 1.4853 reflecting the 10% increase, the 17.23% increase, the 9.83% increase, and the 4.87% increase [1.10 x 1.1723 x 1.0983 x 1.0487 = 1.4853] in accordance with December 6, 2013 Amendments to EPA's Civil Penalty Policies to Implement the 2013 Civil Monetary Penalty Inflation Adjustment Rule (Effective December 6, 2013). Resulting values were rounded to the nearest whole number then rounded to nearest 10.

[Directive 9610.12]

### Exhibit 4.D

## Matrix Values for Determining the Gravity-Based Component of a Penalty

(Use for Violations Occurring after November 2, 2015)

Extent of Deviation from Requirement

		<i>Major</i>	<i>Moderate</i>	<i>Minor</i>	
Potential for Harm	<i>Major</i>	2,670	1,780	890	Major
	<i>Moderate</i>	1,340	890	450	Moderate
	<i>Minor</i>	360	180	90	Minor

NOTE: These amounts constitute the matrix value only. They are **not** the initial penalty target figure. The initial penalty target figure is calculated as follows:

$$\text{Initial Penalty Target Figure} = \text{Economic Benefit Component} + \left( \text{MATRIX VALUE} \times \text{Violator Specific Adjustment} \times \text{Environmental Sensitivity Multiplier} \times \text{Days of Noncompliance Multiplier} \right)$$

Note: Original values provided in Directive 9610.12, November 14, 1990 have been adjusted for inflation by multiplying by 1.78156 in accordance with July 27, 2016 Amendments to EPA's Civil Penalty Policies to Implement the 2016 Civil Monetary Penalty Inflation Adjustment Rule (Effective August 1, 2016). Resulting values were rounded to the nearest whole number then rounded to the nearest 10.

[Directive 9610.12]