

Exhibit 4

Matrix Values for Determining the Gravity–Based Component of a Penalty

		Extent of Deviation from Requirement				
		Major	Moderate	Minor	Potential for Harm	
Major	Major	2,670	1,780	890		Major
	Moderate	1,340	890	450		Moderate
	Minor	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:

Initial Penalty
Target Figure

=

Economic
Benefit
Component

+

MATRIX
VALUE

x

Violator-
Specific
Adjustments

x

Environmental
Sensitivity
Multiplier

x

Days of
Noncompliance
Multiplier

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.