

Exhibit 4.A.

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

		Extent of Deviation from Requirement				
		Major	Moderate	Minor	Potential for Harm	
Major	Major	2,230	1,490	740		Major
	Moderate	1,110	740	370		Moderate
	Minor	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:

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 1.4853 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 + 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]