

ALABAMA DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT



IN THE MATTER OF:)
) Order No. 20-XXX-CSW
Big Sky Environmental, LLC)
5100 Flat Top Road)
Adamsville, Jefferson County, Alabama)
Solid Waste Disposal Permit No. 37-48)

PREAMBLE

This Special Order by Consent is made and entered into by the Alabama Department of Environmental Management (hereinafter “the Department”) and Big Sky Environmental, LLC (hereinafter “Permittee” or “Big Sky”) pursuant to the provisions of the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and the Solid Wastes and Recyclable Materials Management Act (hereinafter “SWRMMA”), Ala. Code §§ 22-27-1 to 22-27-18, as amended.

STIPULATIONS

1. The Permittee operates a municipal solid waste landfill known as the Big Sky Environmental, LLC Solid Waste Facility (hereinafter “landfill”) located in Adamsville, Jefferson County, Alabama, which is the subject of this Consent Order.
2. The Department is a duly constituted department of the State of Alabama pursuant to Ala. Code §§ 22-22A-1 to 22-22A-17, as amended.
3. Pursuant to Ala. Code § 22-22A-4(n), as amended, and Ala. Code § 22-27-9(a), as amended, the Department is the state agency authorized to administer and enforce the provisions of the SWRMMA, Ala. Code §§ 22-27-1 to 22-27-18, as amended.

DEPARTMENT'S CONTENTIONS

4. On July 12, 2018, the Department renewed Solid Waste Disposal Permit No. 37-48 for the operation of a municipal solid waste landfill located at 5100 Flat Top Road, Adamsville, Jefferson County, Alabama.

5. On March 8, 2018, Department personnel conducted an inspection of the Permittee's landfill to determine compliance with Solid Waste Disposal Permit No. 37-48 and Division 13 of the ADEM Administrative Code. During the inspection, the following violations were noted:

A. ADEM Admin. Code r. 335-13-4-.22(1)(d) states that the landfill unit must be operated in accordance with approved plans and permits. Section I. F. of the facility permit requires that the facility be operated to minimize the possibility of an unplanned sudden or nonsudden release of contaminants (including leachate) to air, soil, groundwater, or surface water. A leachate collection system sump pump was clogged, causing leachate to overflow from the sump. The leachate seep had not yet reached the sediment basin.

B. ADEM Admin. Code r. 335-13-4-.18(2) and Section VII. of the facility permit require a leachate collection system that is designed and constructed to maintain less than a 30 cm (12 inches) depth of leachate over the liner. The recorded depth of leachate on the landfill liner was 114 inches (as demonstrated by the leachate collection system pump meter reading).

C. ADEM Admin. Code r. 335-13-4-.22(1)(a) and Section III. H. of the facility permit require that all waste be covered with a minimum of six inches of compacted earth or alternative cover material at the conclusion of each day's operation to control disease vectors, fires, odors, blowing litter, and scavenging. Flagging of waste was noted in the active MSW cell and along the slopes of the inactive MSW cell of the landfill, which indicates insufficient cover.

D. ADEM Admin. Code r. 335-13-4-.23(2)(c) states completed sites or portions of sites shall be properly closed as provided by Division 13 and approved facility plans. Furthermore, ADEM Admin. Code r. 335-13-4-.17(2) states that owners or operators must design, construct and maintain a run-off control system from the active and/or closed portions of the landfill. Department personnel documented standing water on the inactive area of the C/D unit.

6. On March 9, 2018, the Department received a response to the March 8, 2018, inspection indicating that the violations noted had been addressed or the facility was in the process of addressing them.

7. On March 19, 2018, the Department conducted a follow-up inspection of the landfill to verify details of the March 9, 2018, response. During the inspection, the following violation was noted:

A. ADEM Admin. Code r. 335-13-4-.22(1)(a) requires that all waste at MSW landfills be covered with a minimum of six inches of compacted earth or alternative cover material at the conclusion of each day's operation. ADEM Admin. Code r. 335-13-4-.23(1)(a)1. states all waste at C/D landfills must be covered weekly with a minimum of six inches of compacted earth or alternative cover material. Furthermore, Section III. H. of the facility permit requires that all waste be covered with a minimum of six inches of compacted earth or alternate cover at the end of each day's operation for the MSW disposal area and weekly for the C/D disposal area. Flagging waste was noted on the slopes of the inactive MSW cell. In addition, excessive flagging of waste, as well as significant areas of uncovered waste were noted on the top of the cell. In addition, the entire waste mass in the C/D disposal area had not been covered at the end of the previous week's business.

8. On April 11, 2018, the Department issued a Notice of Violation (hereinafter “NOV”) addressing the violations noted during the March 8, 2018 and March 19, 2018 inspections.

9. On April 25, 2018, the Department received a response to the NOV, indicating that the violations had been addressed or the facility was in the process of addressing them.

10. On February 27, 2019, Department personnel conducted an inspection of the Permittee’s landfill to determine compliance with Solid Waste Permit No. 37-48 and Division 13 of the ADEM Administrative Code. During the inspection, the following violations were documented:

A. ADEM Admin. Code r. 335-13-4-.22(1)(d) states that the landfill unit must be operated in accordance with approved plans and permits. Section I. F. of the facility permit requires that the facility be operated to minimize the possibility of an unplanned sudden or nonsudden release of contaminants (including leachate) to air, soil, groundwater, or surface water. A leachate seep was observed near the sump pump pipe on the southeast corner of the MSW area. The leachate seep had not yet reached the sediment basin.

B. ADEM Admin. Code r. 335-13-4-.22(2)(b) (for MSW landfills) and ADEM Admin. Code r. 335-13-4-.23(2)(b) (for C/D landfills), and Section III. X. of the facility permit, require that litter be controlled within the permitted facility. Blown litter and flagging waste were noted on the MSW and C/D slopes.

C. ADEM Admin. Code r. 335-13-4-.23(1)(c) and Section III. J. of the facility permit state all waste shall be confined to as small an area as possible. Furthermore, ADEM Admin. Code r. 335-13-4-.23(1)(a) and Section III. H. of the facility permit states all waste shall be covered with a minimum of six inches of compacted earth or alternative cover material at the

conclusion of each week's operation. The C/D active face was not confined to a small area and the waste had not been adequately covered at the close of the previous week's business.

D. ADEM Admin. Code r. 335-13-4-.23(1)(b) and Section III. I. of the facility permit state that all waste shall be thoroughly spread in layers two feet or less in thickness and thoroughly compacted weekly with adequate landfill equipment prior to placing additional layers of waste or placing the weekly cover. Waste did not appear to have been compacted at the close of the previous week's business. However, it was noted that the C/D area was behind on compaction due to equipment being down for maintenance.

11. On April 8, 2019, the Department issued an NOV addressing the violations noted above.

12. On April 30, 2019, the Department received a response to the NOV indicating that the violations had been addressed or the facility was in the process of addressing them.

13. On December 6, 2019, Department personnel conducted an inspection of the Permittee's landfill to determine compliance with Solid Waste Permit No. 37-48 and Division 13 of the ADEM Administrative Code. During the inspection, the following violations were documented:

A. ADEM Admin. Code r. 335-13-4-.22(1)(a) requires that all waste at MSW landfills be covered with a minimum of six inches of compacted earth or alternative cover material at the conclusion of each day's operation. ADEM Admin. Code r. 335-13-4-.23(1)(a)1. states all waste at C/D landfills must be covered weekly with a minimum of six inches of compacted earth or alternative cover material. Furthermore, Section III. H. of the facility permit requires that all waste be covered with a minimum of six inches of compacted earth or alternate cover at the end of each day's operation for the MSW disposal area and weekly for the C/D

disposal area. Flagging of waste was noted along the slopes of the active MSW cell and the C/D cell of the landfill.

B. ADEM Admin. Code r. 335-13-4-.22(1)(k) and Section III. R. of the facility permit state that containers capable of holding liquids shall not be accepted at a landfill unit unless certain conditions are met. Furthermore, in accordance with Section III.S. of the facility permit, the Permittee shall render empty containers larger than normally found in household waste unsuitable for holding liquids prior to delivery to the landfill unit unless otherwise approved by ADEM. Numerous large drums (30-55 gallon) were observed in the MSW active face area of the landfill.

14. On January 3, 2020, the Department issued a NOV addressing the violations noted above.

15. On January 29, 2020, the Department received a response to the NOV addressing the noted violations. The response indicated corrective measures had been taken to correct the violations noted in the NOV.

16. On February 25, 2020, Department personnel conducted an inspection of the facility to determine compliance with the facility permit and Division 13 of the ADEM Administrative Code. During the inspection, the following violation was noted:

A. ADEM Admin. Code r. 335-13-4-.22(1)(d) states that the landfill unit must be operated in accordance with approved plans and permits. Section I.F. of the facility permit requires that the facility be operated to minimize the possibility of an unplanned sudden or nonsudden release of contaminants (including leachate) to air, soil, groundwater, or surface water. A leachate seep was observed at the toe of the east slope of the inactive MSW cell.

Leachate was observed in the drainage ditch leading towards the sediment pond but had not yet reached the sediment basin.

17. On June 30, 2020, Department personnel conducted an inspection of the Permittee's landfill to determine compliance with Solid Waste Disposal Permit No. 37-48 and Division 13 of the ADEM Administrative Code. During the inspection, the following violations were noted:

A. ADEM Admin. Code r. 335-13-4-.22(1)(d) states that the landfill unit must be operated in accordance with approved plans and permits. Section I.F. of the facility permit requires that the facility be operated to minimize the possibility of an unplanned sudden or nonsudden release of contaminants (including leachate) to air, soil, groundwater, or surface water. A leachate seep was observed on the south slope of the active MSW cell. Leachate was pooled at the toe of the south slope but had not reached the drainage ditch. Run off from the waste solidification pit was observed on the north slope of the active MSW cell. The run off from the waste solidification pit was pooled below the north slope. Additionally, the leachate collection system pump was not running, causing leachate to flow out of the riser pipe at the south side of the inactive MSW cell and subsequently running into the drainage ditch.

B. ADEM Admin. Code r. 335-13-4-.18(2) requires a leachate collection system that is designed and constructed to maintain less than a 30 cm (12 inches) depth of leachate over the liner. The leachate pump was not running at the time of inspection and leachate was observed flowing out of the riser pipe. The depth of leachate on the liner was not able to be recorded because the leachate pump was not running at the time of inspection; however excess leachate was observed flowing out of the riser pipe.

C. ADEM Admin. Code r. 335-13-4-.22(2)(b) and Section III. X. of the facility permit require that litter be controlled within the permitted facility. Blown litter was noted around the south slope of the active MSW cell.

D. ADEM Admin. Code r. 335-13-4-.22(1)(b), requires that all waste shall be confined to as small an area as possible. Furthermore, ADEM Admin. Code r. 335-13-4-.22(1)(a) and Section III. H. of the facility permit require that all waste be covered with a minimum of six inches of compacted earth or alternative cover material at the conclusion of each day's operation. The MSW active face was not confined to a small area and the waste had not been adequately covered, resulting in flagging of waste and areas of uncovered waste.

E. ADEM Admin. Code r. 335-13-4-.17(3) requires on-site drainage structures to carry incident precipitation from the disposal site so as to minimize the generation of leachate, erosion, and sedimentation. Department personnel noted standing water on top of the MSW landfill.

18. On July 2, 2020, the Department received a response to the June 30th inspection indicating that new pump had been installed and the riser pipe was no longer leaking. Pictures were also submitted showing that the areas of pooled water and leachate seeps had been regraded and covered.

19. Pursuant to Ala. Code § 22-22A-5(18)c., as amended, in determining the amount of any penalty, the Department must give consideration to the seriousness of each violation, including any irreparable harm to the environment and any threat to the health or safety of the public; the standard of care manifested by the Permittee; the economic benefit which delayed compliance may confer upon the Permittee; the nature, extent and degree of success of the Permittee's efforts to minimize or mitigate the effects of such violation upon the environment; the

Permittee's history of previous violations; and the ability of the Permittee to pay such penalty. Any civil penalty assessed pursuant to this authority shall not exceed \$25,000.00 for each violation, provided however, that the total penalty assessed in an order issued by the Department shall not exceed \$250,000.00. Each day such violation continues shall constitute a separate violation. In arriving at this civil penalty (summarized in Attachment A), the Department has considered the following:

A. SERIOUSNESS OF THE VIOLATION: The Permittee failed to comply with certain provisions of ADEM Admin. Code div. 335-13 and Solid Waste Disposal Permit No. 37-48 regarding landfill operations. The Department is unaware of any irreparable harm to the environment, or any immediate threat to human health or the safety of the public as a result of these violations.

B. THE STANDARD OF CARE: The Permittee failed to employ an appropriate standard of care to ensure compliance with certain solid waste disposal requirements.

C. ECONOMIC BENEFIT WHICH DELAYED COMPLIANCE MAY HAVE CONFERRED: The Department has been unable to ascertain if the Permittee has realized an economic benefit as a result of the violations noted.

D. EFFORTS TO MINIMIZE OR MITIGATE THE EFFECTS OF THE VIOLATION UPON THE ENVIRONMENT: The Department is unaware of any efforts employed by the Permittee to mitigate potential effects upon the environment that may have been created as a result of the violations listed.

E. HISTORY OF PREVIOUS VIOLATIONS: The Permittee has a history of similar violations.

F. THE ABILITY TO PAY: The Permittee has not alleged an inability to pay the civil penalty.

G. OTHER FACTORS: It should be noted that this Consent Order is a negotiated settlement and, therefore, the Department has determined the amount of the penalty it believes is warranted in this matter in the spirit of cooperation and the desire to resolve this matter amicably, without incurring the unwarranted expense of litigation.

20. The Department neither admits nor denies the Permittee's contentions, which are set forth below. The Department has agreed to the terms of this Consent Order in an effort to resolve the alleged violations cited herein without the unwarranted expenditure of State resources in further prosecuting the above violations. The Department has determined that the terms contemplated in this Consent Order are in the best interests of the citizens of Alabama.

PERMITTEE'S CONTENTIONS

21. The Permittee neither admits nor denies the Department's contentions. The Permittee consents to abide by the terms of this Consent Order and to pay the civil penalty assessed herein.

22. The Permittee has made every effort to maintain compliance with applicable ADEM regulatory and permit requirements and has responded to issues raised by Department personnel during inspections and in subsequent correspondence.

23. As previously communicated to the Department in separate correspondence, upon discovery of the leachate sump overflow, a tanker truck and portable pump were brought in to manage leachate. A new, replacement pump was ordered and delivered the next day for installation. Additionally, measures were taken to clean out the sump to ensure the removal of

any residual solids present in the sump, which were identified as the cause of the pump and motor failure. Since the 2018 incident, Big Sky has established a quarterly preventative maintenance schedule for the jet cleaning of this sump by an outside contractor at a cost of \$3,121.10 per event as a means of minimizing the build-up of sediment, which appears to be the cause of the pump and motor failure. Despite this proactive preventative maintenance, Big Sky has had to replace this same pump at least twice per year at a cost of \$2,477.00 per event since the incident in question due to sediment build-up causing the pump motor to fail. Big Sky believes that this situation will be significantly alleviated by the installation of a second leachate sump pump as part of the upcoming construction of Cell 4.

24. The Permittee continues to make the presence of flagging waste in both the active and inactive portions of the Big Sky landfill an operational emphasis for its operators. Heavy rains and the resulting erosion have often exacerbated efforts to maintain sufficient cover at the landfill. Additionally, previously documented equipment breakdowns played a significant role in the observed failure to adequately cover the C/D area and to confine the active working to as small an area as possible. Recent equipment repairs costing \$67,000.00 should make this less of a possible cause in future operations. These repairs, coupled with continued training for its operators stressing the importance on maintaining sufficient cover to minimize flagging and minimize the size of the working face, should serve to minimize the potential for these issues to arise in future inspections.

25. The observed drums were brought to the landfill for disposal under an ADEM-approved special waste profile. The waste profile for this waste stream dates back to 2016, and since that time it has been Big Sky's practice to render the empty drums unsuitable for holding liquids by crushing them in the working face with the compactor. This method of complying with the referenced regulatory requirement has not been noted in previous inspections as being

an issue, despite its use for several years. At no time did the drums remain in the working face for any significant length of time nor accumulate rainwater prior to being crushed and made unsuitable for holding liquids. However, in the future, the Permittee will take steps to ensure that any such drums brought to the landfill for disposal are unsuitable for holding liquids prior to placing them into the working face.

26. While it was noted that during two of the referenced inspections that blown litter was observed and not being actively controlled at the time of the inspection, Big Sky does not believe these isolated observations are indicative of the efficacy of its efforts to control litter. In fact, Big Sky believes it implements a robust litter control plan within the landfill boundary. In fact, landfill employees have been observed by ADEM inspectors on numerous previous occasions actively picking up litter within the landfill. At no time has an ADEM inspector documented litter outside the permitted boundary of the landfill, as is prohibited by the ADEM Solid Waste Program regulations and the landfill permit. Neither the regulations nor the permit requires a continuous litter control program, rather both require that “litter be controlled within the permitted boundary.” Since litter has not been documented as being observed outside the landfill’s permitted boundary, the Permittee contends its litter control program meets both the letter and the intent of the permit and regulatory requirements.

27. Big Sky believes that the sump pump transducer meter reading of 114 inches observed by the ADEM inspector on March 8, 2018, was the result of an instrumentation malfunction, as was the case in February 2017 when a reading of 116 inches was recorded. In both cases, once the transducer was re-set, meter readings return to normal levels. According to the pump supplier, the transducer is set to measure the depth of leachate in the sump, and not the depth of leachate on the landfill liner. It also remains the Permittee’s contention that neither the meter reading observed in March 2018, nor the observed leachate seep in June 2020 were

definitive indicators of noncompliance with the requirement to maintain no more than 12 inches of leachate on the landfill liner.

ORDER

THEREFORE, without admitting that it has violated any statutes or regulations, the Permittee, along with the Department, desires to resolve and settle the alleged violations cited above. The Department has carefully considered the facts available to it and has considered the six penalty factors enumerated in Ala. Code § 22-22A-5(18), as amended, as well as the need for timely and effective enforcement; the Department believes that the following conditions are appropriate to address the violations alleged herein. Therefore, the Department and the Permittee agree to enter into this Consent Order with the following terms and conditions:

A. That, not later than **three hundred sixty-five (365) days** after issuance of this Order, the Permittee shall pay to the Department a civil penalty in the amount of \$18,525.00 for the violations cited herein. Said penalty shall be made payable to the Alabama Department of Environmental Management by certified check or cashier's check and shall be remitted to:

Office of General Counsel
Alabama Department of Environmental Management
P.O. Box 301463
Montgomery, Alabama 36130-1463

All checks shall reference the Permittee's name and address and the ADEM Consent Order number of this action.

B. That immediately, upon the issuance of this Order and continuing each and every day thereafter, the Permittee shall comply with all applicable provisions of ADEM Admin Code div. 335-13 and Solid Waste Disposal Permit Number 37-48.

C. That, not later than **thirty days** from the issuance of this Order, the Permittee shall submit a Corrective Action Plan to the Department to address the violations listed in this

Order. At a minimum, the plan shall include a detailed description of measures that have or will be taken to address:

1. Surface water management at the site to prevent pooled water within the landfill unit;

2. Daily operations at the facility including, proper application of cover material, confining waste to as small an area as possible, properly compacting waste prior to placing additional waste layers or cover in both the MSW and C/D disposal areas and controlling litter site wide (the information should include standard operating procedures in place at the facility as it pertains to these items);

3. Proper management and maintenance of the leachate collection system (the information should address leachate seeps, and should include information on how the amount of leachate on the liner is determined and maintained at appropriate levels);

4. Acceptance of waste only as allowed in the permit;

5. The proper removal/disposal of leachate and leachate contaminated stormwater and/or soils so as not to result in an unpermitted discharge of leachate; and

6. A schedule for implementation of recommended actions to address the violations outlined in this Order.

If the Department determines through its review of the submitted Corrective Action Plan that it is not sufficient to accomplish compliance with all applicable provisions of ADEM Admin. Code div. 335-13 and Solid Waste Disposal Permit No. 37-48, then the Permittee shall submit a revised Corrective Action Plan, addressing the Department's concerns, no later than **thirty days** after receipt of the Department's comments. The Permittee shall complete implementation of the recommendations made in the Corrective Action Plan pursuant to the schedule set forth in the approved plan.

D. That, not later than **thirty days** from the issuance of this Order, the Permittee shall submit an updated solidification plan describing, in detail, facility operations as it pertains to solidification.

E. The parties agree that this Consent Order shall apply to and be binding upon both parties, their directors, officers, and all persons or entities acting under or for them. Each signatory to this Consent Order certifies that he or she is fully authorized by the party he or she represents to enter into the terms and conditions of this Consent Order, to execute the Consent Order on behalf of the party represented, and to legally bind such party.

F. The parties agree that, subject to the terms of these provisions and subject to provisions otherwise provided by statute, this Consent Order is intended to operate as a full resolution of the violations, which are cited in this Consent Order.

G. The Permittee agrees that it is not relieved from any liability if it fails to comply with any provision of this Consent Order.

H. For purposes of this Consent Order only, the Permittee agrees that the Department may properly bring an action to compel compliance with the terms and conditions contained herein in the Circuit Court of Montgomery County.

I. The parties agree that the sole purpose of this Consent Order is to resolve and dispose of all allegations and contentions stated herein concerning the factual circumstances referenced herein. Should additional facts and circumstances be discovered in the future which would constitute possible violations not addressed in this Consent Order, then such future violations may be addressed in Orders as may be issued by the Director, litigation initiated by the Department, or such other enforcement action as may be appropriate; the Permittee shall not object to such future orders, litigation, or enforcement action based on the issuance of this

Consent Order if future orders, litigation, or other enforcement action address new matters not raised in this Consent Order.

J. The parties agree that this Consent Order shall be considered final and effective immediately upon signature of all parties. This Consent Order shall not be appealable, and the Permittee does hereby waive any hearing on the terms and conditions of this Consent Order.

K. The parties agree that this Consent Order shall not affect the Permittee's obligation to comply with any Federal, State, or local laws or regulations.

L. The parties agree that final approval and entry into this Consent Order are subject to the requirements that the Department give notice of proposed Orders to the public, and that the public have at least thirty days within which to comment on the Order.

M. The parties agree that, should any provision of this Consent Order be declared by a court of competent jurisdiction or the Environmental Management Commission to be inconsistent with Federal or State law and therefore unenforceable, the remaining provisions hereof shall remain in full force and effect.

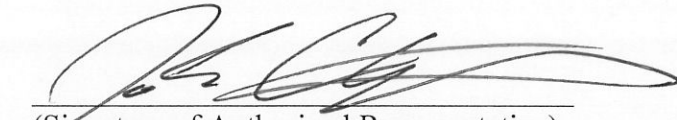
N. The parties agree that any modifications of this Consent Order must be agreed to in writing signed by both parties.

O. The parties agree that, except as otherwise set forth herein, this Consent Order is not and shall not be interpreted to be a permit or modification of an existing permit under Federal, State or local law, and shall not be construed to waive or relieve the Permittee of its obligations to comply in the future with any permit.

Executed in duplicate, with each part being an original.

Big Sky Environmental, LLC

ALABAMA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT



(Signature of Authorized Representative)

Lance R. LeFleur
Director

John Click

(Printed Name)

VP of Operations

(Printed Title)

(Date Signed)

8/17/2020

(Date Signed)

Attachment A
Big Sky Environmental, LLC Solid Waste Facility
Adamsville, Jefferson County
Solid Waste Disposal Permit No. 37-48

Violation*	Number of Violations*	Seriousness of Violation*	Standard of Care*	History of Previous Violations*	
Failure to operate in accordance with approved plans and permits (leachate seeps)	4	\$4,000	\$2,000	\$500	
Failure to properly maintain cover on landfill (MSW and C/D disposal areas)	5	\$5,000	\$2,500	\$0	
Failure to maintain litter within the facility (MSW and C/D disposal areas)	2	\$1,000	\$500	\$100	
Failure to confine waste	2	\$2,000	\$1,000	\$300	
Failure to maintain leachate collection system (>12" of leachate on liner)	2	\$1,000	\$500	\$0	
Failure to maintain proper drainage (pooled/standing water)	2	\$2,000	\$1,000	\$0	
Failure to adequately compact waste	1	\$500	\$250	\$0	
Accepting waste not stipulated on permit large drums in MSW disposal area)	1	\$250	\$125	\$0	
					Total of Factors
TOTAL PER FACTOR		\$15,750	\$7,875	\$900	\$24,525

Adjustments to Amount of Initial Penalty	
Mitigating Factors (-)	\$0
Ability to Pay (-)	\$0
Other Factors (+/-)	\$0
Total Adjustments (+/-) <i>Enter at Right</i>	(\$6000)

Economic Benefit (+)	\$0
Amount of Initial Penalty	\$24,525
Total Adjustments (+/-)	(\$6000)
FINAL PENALTY	\$18,525

Footnotes * See the "Department's Contentions" portion of the Order for a detailed description of each violation and the penalty factors.