

Sutton penalty

Zimmerman
3/10/2015

K=1000

Arsenic 365 violations @ \$5,000 @ day - \$1,825 K

Selenium 729 " @ \$5,000 @ day - \$3,645 K

Thallium 1668 " @ \$5,000 @ day - \$8,340 K

Arsenic, Selenium, Thallium - priority pollutants w/
fairly low, to low 2L standards

Boron 1,822 violations @ \$5,000 @ day - \$9,110 K

- not priority pollutant; large impact area and impacts
found in water supply wells

Iron 730 violations @ \$1,000 @ day \$730 K

Manganese 730 " " \$730 K

TDS 728 " " \$728 K

Secondary standards; statistically relevant violations

* discussed penalty amounts with Jim Gregson, Morelle S. King
and Geoff Kegley @ W.RO
* all felt penalties were appropriate given impact to resource