



National Enforcement Trends (NETs)

Top 25 Civil Enforcement Cases in FY 2006 Based on Penalty Assessed Amount

(Inflation/Deflation Adjusted to FY 10 Dollars- Cases Sorted and Ranked by Inflation Adjusted Amounts)

Rank	ICIS Enforcement Action Name	ICIS Enforcement Action Identifier	Primary Law	Federal Penalty Assessed (Nominal)	Federal Penalty Assessed (Inflation/Deflation Adjusted to FY10 Dollars)	Consent Decree Entry/ Final Order Issue Date	Final Order Type
1	UNITED ORGANICS CORPORATION & MALCOLM LIEBERMAN	04-2004-9042	RCRA	\$32,759,000	\$35,510,756	05/17/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
2	E. I. DU PONT DE NEMOURS AND COMPANY	HQ-2004-5108	TSCA	\$10,250,000	\$11,111,000	12/21/2005	Administrative Penalty Order With or Without Injunctive Relief
3	MOTIVA ENTERPRISES, LLC , ET AL	03-2001-0334	CWA	\$6,250,000	\$6,775,000	01/12/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
4	EXXON MOBIL NATIONAL CASE	05-2000-0612, 06-2002-3716, 06-2001-0271, 08-2003-0049, 09-2006-0020	CAA	\$6,000,000	\$6,504,000	12/13/2005	Consent Decree or Court Order Resolving a Civil Judicial Action
5	MARINE SHALE PROCESSORS INC	06-1990-0009	RCRA	\$3,962,998	\$4,295,890	09/11/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
6	VALERO NATIONAL CASE	02-2002-0004, 06-2000-1220, 08-2002-0042, 09-2005-0208	CAA	\$3,399,999	\$3,685,599	11/23/2005	Consent Decree or Court Order Resolving a Civil Judicial Action
7	CONOCO PHILLIPS NATIONAL CASE	02-2004-0014, 03-2006-0272, 05-2005-5003, 06-2000-1237, 09-2004-0362, 10-2004-0217	CAA	\$3,094,497	\$3,354,435	12/05/2005	Consent Decree or Court Order Resolving a Civil Judicial Action
8	LUCITE INTERNATIONAL, INC.	04-2004-9021	CAA	\$1,800,000	\$1,951,200	02/28/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
9	3M COMPANY	HQ-2006-5004	TSCA	\$1,521,983	\$1,649,830	05/01/2006	Administrative Penalty Order With or Without Injunctive Relief
10	SUNOCO NATIONAL CASE	03-2001-0326, 05-2001-0725, 06-2002-3747	CAA	\$1,500,000	\$1,626,000	03/21/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
11	NEW YORK, THE CITY OF	02-2002-0013	RCRA	\$1,300,000	\$1,409,200	03/27/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
12	VOLKSWAGEN OF AMERICA, INC	EF-2004-3011	CAA	\$1,115,126	\$1,208,797	11/10/2005	Consent Decree or Court Order Resolving a Civil Judicial Action
13	DAIMLERCHRYSLER CORPORATION	EF-2004-4999	CAA	\$1,000,000	\$1,084,000	03/02/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
14	MORTON INTERNATIONAL, INC. NATIONAL CASE	01-2006-5221, 03-2006-0500, 04-1998-0459, 05-2006-7501, 06-1998-4501, 09-1999-0210, 10-2006-0365, HQ-2006-6008	RCRA, CWA, TSCA	\$900,000	\$975,600	11/22/2005	Consent Decree or Court Order Resolving a Civil Judicial Action
	BP PRODUCTS NORTH AMERICA INC. CONSOLIDATED CASES	HQ-2000-0078	CAA	\$900,000	\$975,600	09/27/2006	Administrative Penalty Order With or Without Injunctive Relief



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16	IDAHO TRANSPORTATION DEPARTMENT AND SCARSELLA BROTHERS INC	10-2003-0132	CWA	\$895,000	\$970,180	06/23/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
17	FRANKLIN POWER PRODUCTS	05-2002-2010	CWA	\$851,013	\$922,498	06/22/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
18	PFLUEGER PROPERTIES	09-2002-0138	CWA	\$830,000	\$899,720	06/16/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
19	FOREST OIL CORPORATION	10-2006-0247	CWA	\$813,000	\$881,292	08/30/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
20	DALLAS, CITY OF	06-2004-2380	CWA	\$800,000	\$867,200	08/28/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
21	ERAMET MARIETTA INC.	05-2000-0494	CWA	\$750,000	\$813,000	04/19/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
22	TANANA OIL CORP, ET. AL.	03-2005-0234	RCRA	\$745,000	\$807,580	04/18/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
23	MCWANE (TYLER PIPE)	06-2006-3319	CAA	\$724,388	\$785,237	09/29/2006	Administrative Penalty Order With or Without Injunctive Relief
24	CARGILL NATIONAL CASE	04-2004-9012, 05-2004-0706, 06-2004-3401, 07-2004-0313, 08-2004-0054	CAA	\$719,996	\$780,476	03/03/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
25	CURRAHEE CLUB, LLC	04-2004-9045	CWA	\$600,000	\$650,400	09/21/2006	Consent Decree or Court Order Resolving a Civil Judicial Action



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1	PSE&G FOSSIL, LLC (CD AMENDMENT)	02-2001-0020	CAA	\$4,250,000	\$4,500,750	05/02/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
2	WISCONSIN ELECTRIC POWER COMPANY	05-2003-0333	CAA	\$3,100,000	\$3,282,900	09/30/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
3	TOTAL PETROLEUM USA, INC. REFERRAL (FORMERLY ATOFINA)	06-2005-3408	CAA	\$2,900,000	\$3,071,100	07/12/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
4	LAWSON BROTHERS	09-2003-0076	RCRA	\$2,362,000	\$2,501,358	03/21/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
5	WILLIAMS REFINING/PREMCOR	04-2003-9040	CAA	\$2,200,000	\$2,329,800	05/21/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
6	CUMMINS ENGINE CO., INC. (CD AMENDMENT)	HQ-1998-0306	CAA	\$2,170,000	\$2,298,030	11/01/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
7	C&D TECHNOLOGIES, INC. (POWER COM)	05-1999-0765	CWA	\$1,600,000	\$1,694,400	11/20/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
8	KINDER MORGAN - PIPELINE SPILLS	09-2004-0355	CWA	\$1,585,893	\$1,679,461	07/27/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
9	SYNGENTA SEEDS, INC.	HQ-2006-5016	FIFRA	\$1,517,875	\$1,607,430	01/19/2007	Administrative Penalty Order With or Without Injunctive Relief
10	MID-VALLEY PIPELINE	04-2005-9015	CWA	\$1,400,000	\$1,482,600	11/02/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
11	MERCEDES	WF-2006-1001	CAA	\$1,200,000	\$1,270,800	04/01/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
12	TYCO INTERNATIONAL (US), INC.	02-2005-0019	CAA	\$1,137,000	\$1,204,083	04/23/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
13	PRASA V -PUERTO RICO AQUEDUCT AND SEWER AUTHORITY	02-2004-0008	CWA	\$1,000,000	\$1,059,000	01/10/2007	Consent Decree or Court Order Resolving a Civil Judicial Action



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14	RHODIA INC. (NATIONAL CASE)	05-2005-4549, 06-2006-3404, 09-2006-0122	CAA	\$999,999	\$1,058,999	07/23/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
15	INFINEUM USA L.P.	02-2006-9126	TSCA	\$950,000	\$1,006,050	11/02/2006	Administrative Penalty Order With or Without Injunctive Relief
16	ICICLE SEAFOODS INC AND EVENING STAR INC	10-2005-0070	CWA	\$900,000	\$953,100	09/18/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
17	EAST KENTUCKY POWER COOPERATIVE (SPURLOCK & DALE PLANTS) (04-2007-C019)	04-2003-9015	CAA	\$750,000	\$794,250	09/24/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
	ROYSTER-CLARK NITROGEN	05-2005-3976	CAA	\$750,000	\$794,250	03/27/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
	VON ROLL AMERICAS	05-2005-3982	CAA	\$750,000	\$794,250	02/02/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
20	CEMEX INC. (SOUTHDOWN)	05-2003-0345	CAA	\$679,711	\$719,814	12/12/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
21	SAFeway INC.	09-2007-0105	FIFRA	\$675,000	\$714,825	07/03/2007	Administrative Penalty Order With or Without Injunctive Relief
22	CUMMINS ENGINE CO., INC. (CD AMENDMENT)	HQ-1998-0306	CAA	\$637,500	\$675,113	10/06/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
23	WCI STEEL INC	05-2007-9908	RCRA	\$620,000	\$656,580	02/06/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
24	KINDER MORGAN TRANSMIX	WF-2007-0003	CAA	\$613,000	\$649,167	04/20/2007	Administrative Penalty Order With or Without Injunctive Relief
25	AGRIPROCESSORS, INC	07-2003-0186	CWA	\$590,756	\$625,611	11/29/2006	Consent Decree or Court Order Resolving a Civil Judicial Action



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Rank	ICIS Enforcement Action Name	ICIS Enforcement Action Identifier	Primary Law	Federal Penalty Assessed (Nominal)	Federal Penalty Assessed (Inflation/Deflation Adjusted to FY10 Dollars)	Consent Decree Entry/ Final Order Issue Date	Final Order Type
1	MASSEY ENERGY COMPANY (NATIONAL CASE)	03-2005-0380, 04-2006-9037	CWA	\$20,000,000	\$20,280,000	04/09/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
2	AMERICAN ELECTRIC POWER CO (NATIONAL CASE)	03-1999-0388, 04-1999-9000, 05-1999-0644	CAA	\$15,000,000	\$15,210,000	12/10/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
3	EAST KENTUCKY POWER COOPERATIVE	04-2006-9007	CAA	\$11,400,000	\$11,559,600	11/30/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
4	MAGELLAN PIPELINE COMPANY (NATIONAL CASE)	05-2004-5602, 06-2004-4890, 07-2002-0219	CWA	\$5,299,998	\$5,374,198	09/04/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
5	EUCLID OF VIRGINIA, INC	03-2002-0303	RCRA	\$3,164,555	\$3,208,859	03/11/2008	Administrative Penalty Order With or Without Injunctive Relief
6	TE PRODUCTS PIPELINE COMPANY, L.P.	06-2003-4811	CWA	\$2,865,000	\$2,905,110	10/11/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
7	PREMCOX REFINING GROUP/VALERO ENERGY CO (NATIONAL CASE)	04-2007-9017, 05-2005-7981, 06-2004-3406, EF-2008-0008	CAA	\$2,750,000	\$2,788,500	11/20/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
8	EXXON MOBIL CORPORATION - PCB	09-2008-7002	TSCA	\$2,640,000	\$2,676,960	08/21/2008	Administrative Penalty Order With or Without Injunctive Relief
9	DUPONT (NATIONAL CASE)	03-2004-0068, 04-2004-9041, 05-2003-0351, 06-2003-3339	CAA	\$2,475,000	\$2,509,650	01/24/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
10	MTD	WF-2007-0001	CAA	\$2,000,000	\$2,028,000	06/27/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
11	EQUISTAR (NATIONAL CASE)	05-2004-0807, 06-2004-3409, 07-2005-0188	CAA	\$1,964,200	\$1,991,699	01/25/2008, 01/26/2008, 01/28/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
12	VALERO REFINING TEXAS LP	06-2007-4883	CWA	\$1,650,000	\$1,673,100	08/07/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
13	AGI-VR/WESSON COMPANY	02-2006-0027	CERCLA	\$1,500,000	\$1,521,000	10/29/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
14	HOME DEPOT (NATIONAL CASE)	01-2003-0187, 04-2003-9100, 05-2003-0651, 06-2003-2136, 07-2003-0348, 08-2003-0244, 09-2003-0164, 10-2003-0163	CWA	\$1,300,000	\$1,318,200	05/14/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
15	CENTEX HOMES (NATIONAL CASE)	01-2008-2506, 02-2008-0009, 03-2003-0391, 04-2003-9102, 05-2003-0652, 06-2003-2138, 07-2008-0172, 08-2003-0245, 09-2003-0226, 10-2003-0165	CWA	\$1,284,000	\$1,301,976	08/01/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
16	CONOCOPHILLIPS - BORGER	06-2004-2313	CWA	\$1,200,000	\$1,216,800	07/10/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
17	KB HOMES (NATIONAL CASE)	03-2008-0177, 04-2003-9101, 06-2003-2137, 08-2003-0246, 09-2003-0165	CWA	\$1,106,000	\$1,121,484	07/23/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
18	JUPITER ALUMINUM CORP.	05-2005-4567	CAA	\$1,000,000	\$1,014,000	10/10/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
	SUNRISE LANDFILL	09-2002-0108	RCRA	\$1,000,000	\$1,014,000	09/26/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
20	PFIZER GLOBAL MANUFACTURING	01-2007-1206	CAA	\$975,000	\$988,650	07/21/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
21	GRIFFIN L.L.C. VALDOSTA, GA AND E. I. DUPONT DE NEMOURS AND CO.	04-2008-3028	FIFRA	\$877,500	\$889,785	09/12/2008	Administrative Penalty Order With or Without Injunctive Relief
	THE WM POWELL CO	05-2008-9902	RCRA	\$800,000	\$811,200	02/19/2008	Administrative Penalty Order With or Without Injunctive Relief
22	SINCLAIR OIL COMPANY (NATIONAL CASE)	06-2002-3744, 08-2006-0074	CAA	\$800,000	\$811,200	06/30/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
24	PULTE HOMES (NATIONAL CASE)	01-2008-2505, 02-2008-0011, 03-2008-0176, 04-2005-9041, 05-2006-0302, 06-2008-2015, 07-2008-0171, 08-2005-0232, 09-2004-0321	CWA	\$776,000	\$786,864	08/08/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
25	MERCK AND COMPANY	03-2007-0066	CWA	\$750,000	\$760,500	03/10/2008	Consent Decree or Court Order Resolving a Civil Judicial Action



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1	BP NORTH AMERICA	06-2006-3402	CAA	\$12,000,000	\$12,204,000	09/18/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
2	MAGELLAN PIPELINE, LP AND ENTERPRISE PRODUCTS OPERATING LP	07-2005-0424	CWA	\$3,650,000	\$3,712,050	09/30/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
3	PATRIOT COAL CORP	03-2008-7005	CWA	\$3,575,000	\$3,635,775	04/30/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
4	EXPLORER PIPELINE	06-2008-4881	CWA	\$3,300,000	\$3,356,100	02/23/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
5	SHINTECH, INC.	06-2006-0920	RCRA	\$2,585,004	\$2,628,949	03/06/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
6	CEMEX CALIFORNIA	09-2005-0244	CAA	\$2,000,000	\$2,034,000	03/10/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
7	CITYGAS CORP ET AL	02-2001-0004	RCRA	\$1,400,000	\$1,423,800	08/26/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
	KENTUCKY UTILITIES - E.W. BROWN (04-2009-C007)	04-2006-9012	CAA	\$1,400,000	\$1,423,800	03/18/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
9	JOHNSON INTERNATIONAL	09-2005-0111	CWA	\$1,250,000	\$1,271,250	12/10/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
	BIOFRIENDLY CORPORATION	WF-2007-2000	CAA	\$1,250,000	\$1,271,250	02/11/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
11	MEMPHIS LIGHT, GAS, AND WATER DIVISION	04-2009-2600	TSCA	\$1,220,576	\$1,241,326	11/05/2008	Administrative Penalty Order With or Without Injunctive Relief
12	JORGE ORTIZ	02-2004-0013	CERCLA	\$1,180,414	\$1,200,481	04/08/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
13	INTERSTATE BRANDS CORP. (NATIONAL CASE)	01-2001-0141, 02-2001-0019, 04-2002-9078, 05-2001-0678, 06-2002-3702, 07-2001-0316, 08-2002-0013, 09-2001-0080	CAA	\$1,125,000	\$1,144,125	04/20/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
14	AKRON THERMAL ENERGY CORPORATION (SB)	05-2007-3921	CAA	\$1,100,000	\$1,118,700	10/09/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
15	ANADARKO PETROLEUM CORPORATION	08-2004-0201	CWA	\$1,050,000	\$1,067,850	08/24/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
16	SHELL CHEMICAL YABUCOA	02-2004-0010	CWA	\$1,025,000	\$1,042,425	05/11/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
17	LUCITE INTERNATIONAL & E.I DUPONT DENEMOURS	03-2007-0299	CAA	\$1,000,000	\$1,017,000	07/10/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
18	COLORADO INTERSTATE GAS/NATURAL BUTTES	08-2005-0223	CAA	\$987,757	\$1,004,549	09/10/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
19	SALT RIVER PROJECT - CORONADO	09-2007-0273	CAA	\$950,000	\$966,150	12/19/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
20	ALASKA GOLD CO. AND NOVAGOLD RESOURCES INC - STIPULATION OF SETTLEMENT AND JUDGMENT	10-2008-0175	CWA	\$883,628	\$898,650	08/27/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
21	INVISTA S.A.R.L (NATIONAL CASE)	03-2007-0284, 04-2006-9031, 06-2007-3410, HQ-2006-6007	CAA	\$850,000	\$864,450	07/29/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
22	FRONTIER REFINING (NATIONAL CASE)	07-2006-0084, 08-2006-0073	CAA	\$843,251	\$857,586	03/26/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
23	KEMLITE COMPANY	05-2006-5021	CAA	\$800,000	\$813,600	10/06/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
	ST. MARY'S CEMENT INC.	05-2006-5039	CAA	\$800,000	\$813,600	10/27/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
	UNION PACIFIC RAILROAD COMPANY	09-2006-0228	CWA	\$800,000	\$813,600	09/24/2009	Consent Decree or Court Order Resolving a Civil Judicial Action



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1	PEP BOYS	EF-2007-0007	CAA	\$5,000,000	07/16/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
2	NORFOLK SOUTHERN RAILWAY COMPANY (04-2010-C014)	04-2006-9034	CWA 311	\$4,000,000	05/17/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
3	MCWANE, INC. (NATIONAL CASE)	02-2005-0005, 03-2007-0107, 04-2005-9003, 05-2005-9002, 06-2009-3400, 07-2005-0351, 08-2010-0151, 09-2010-5055	EPCRA 313 // RCRA HW // CWA NPDES // CAA	\$3,575,197	09/20/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
4	LAFARGE NORTH AMERICA, INC. (NC)	02-2004-0024, 03-2005-0075, 04-2004-9039, 05-	CAA	\$3,383,000	03/18/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
5	PLAINS PIPELINE/PLAINS MARKETING (NATIONAL CASE) (LEAD)	06-2005-4881, 07-2005-0092	CWA 311	\$3,250,000	09/20/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
6	FORMOSA PLASTICS	06-2006-3410	CAA	\$2,800,000	02/03/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
7	AGGREGATE INDUSTRIES INC	01-2006-2016	CWA NPDES	\$2,750,000	11/10/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
8	WESTAR ENERGY, INC	07-2004-0319	CAA	\$2,750,000	03/26/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
9	MONSANTO COMPANY	HQ-2010-5014	FIFRA	\$2,500,000	07/01/2010	Administrative Penalty Order With or Without Injunctive Relief
10	MOBIL CABRAS & SAIPANTERMINAL	09-2009-0505	CAA	\$2,400,000	07/27/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
11	ALERIS INTERNATIONAL, INC. (NATIONAL CASE)	03-2006-0161, 04-2005-9045, 05-2006-3947, 06-2006-3403, 09-2006-0121, 10-2006-0284	CAA	\$2,299,999	10/22/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
12	DUNCAN PETROLEUM CORPORATION	03-2007-0104	RCRA UST	\$2,000,000	08/05/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
13	MOSAIC FERTILIZER, LLC (NATIONAL CASE) (04-2010-C029)	04-2006-9038, 06-2006-3408	CAA	\$1,800,000	12/24/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
14	CINERGY - GALLAGHER	05-2000-0201	CAA	\$1,750,000	03/19/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
15	CUMMINS	EF-2008-0021	CAA	\$1,680,000	04/15/2010	Consent Decree or Court Order Resolving a Civil Judicial Action



National Enforcement Trends (NETs)

Top 25 Civil Enforcement Cases in FY 2010 Based on Penalty Assessed Amount

Rank	ICIS Enforcement Action Name	ICIS Enforcement Action Identifier	Primary Law	Federal Penalty Assessed	Consent Decree Entry/ Final Order Issue Date	Final Order Type
16	LANXESS CORPORATION	05-2007-3919	CAA	\$1,550,000	02/04/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
17	SANTILLANES TOWING AND SALVAGE	09-2007-0045	RCRA HW	\$1,519,818	07/07/2010	Administrative Penalty Order With or Without Injunctive Relief
18	SHELL CHEMICAL YABUCOA, INC.	02-2008-0023	CAA	\$1,500,000	07/21/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
19	RINECO CHEMICAL	06-2006-0915	RCRA HW	\$1,350,000	08/17/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
20	CENTURY OIL ACQUISITION CORP	03-2008-7013	RCRA UST	\$1,303,131	12/03/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
21	PACIFIC PIPELINE SYSTEMS	09-2006-0223	CWA 311	\$1,300,690	03/04/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
22	METROPOLITAN BUS AUTHORITY OF PUERTO RICO ET AL.	02-2008-0030	RCRA HW	\$1,200,000	08/24/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
23	SAINT GOBAIN CONTAINERS (NC)	01-2005-1022, 02-2005-0017, 03-2005-0392, 04-2006-9001, 05-2005-5009, 06-2005-3416, 07-2005-0392, 09-2008-0505, 10-2005-0245	CAA	\$1,150,002	05/07/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
24	PRASA VI (BACKWASH)	02-2004-0012	CWA NPDES	\$1,024,427	08/24/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
25	ALLEGHENY LUDLUM CORPORATION ET. AL	03-2008-0095	CAA	\$1,006,000	07/02/2010	Consent Decree or Court Order Resolving a Civil Judicial Action

National Enforcement Trends (NETs)

NETs Page J-4: Top 25 Civil Enforcement Cases in FY 2006 - FY 2010 - Based on Penalty Assessed Amount

Note 1	"Penalties assessed" is the penalty amount that the defendant or respondent in an EPA civil enforcement cases has been ordered to pay by a court or Administrative Law Judge, or the amount the defendant or respondent has legally agreed to pay in an enforceable settlement document.
Note 2	Prior FY dollar figures on this document are adjusted to reflect the value in FY 2010 dollars based on the average fiscal year value of the U.S. Department of Labor Consumer Price Index for All Urban Consumers.
Note 3	Large penalties from a small number of EPA enforcement case settlements make up a substantial percentage of the civil penalties obtained by EPA in most years. These cases represent the top 25 enforcement cases during FY 2006 - FY 2010, which were responsible for a large percentage of the penalty totals reported in each of these FYs.
Note 4	Cases that list more than one enforcement action identification number are multi-facility cases with violating facilities in more than one EPA Region. In such multi-facility, multi-region cases (national cases), each Region enters a record into the Integrated Compliance Information System (ICIS) representing its portion of the case.