



## National Enforcement Trends (NETs)

### Top 25 Civil Enforcement Cases in FY 2006 Based on Estimated Value of Complying Actions to be Taken in Response to EPA's Concluded Enforcement Actions (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	Cost of Complying Actions (Nominal)	Cost of Complying Actions (Inflation Adjusted to FY 10 Dollars)	Consent Decree Entry/ Final Order Issue Date	Final Order Type
1	VALERO REFINING NATIONAL CASE	02-2002-0004, 06-2000-1220, 08-2002-0042, 09-2005-0208	CAA	\$700,000,001	\$758,800,001	11/23/2005	Consent Decree or Court Order Resolving a Civil Judicial Action
2	EXXON MOBIL NATIONAL CASE	05-2000-0612, 06-2001-0271, 06-2002-3716, 08-2003-0049, 09-2006-0020	CAA	\$586,050,000	\$635,278,200	12/13/2005	Consent Decree or Court Order Resolving a Civil Judicial Action
3	CONOCO PHILLIPS NATIONAL CASE	02-2004-0014, 03-2006-0272, 05-2005-5003, 06-2000-1237, 09-2004-0362, 10-2004-0217	CAA	\$530,000,050	\$574,520,054	12/05/2005	Consent Decree or Court Order Resolving a Civil Judicial Action
4	SUNOCO NATIONAL CASE	03-2001-0326, 05-2001-0725, 06-2002-3747	CAA	\$285,500,000	\$309,482,000	03/21/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
5	ALABAMA POWER COMPANY	04-2000-0099	CAA	\$205,100,000	\$222,328,400	06/19/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
6	WASHINGTON SUBURBAN SANITARY COMMISSION	03-2001-0064	CWA	\$200,000,000	\$216,800,000	12/13/2005	Consent Decree or Court Order Resolving a Civil Judicial Action
7	CITY OF RICHWOOD	03-2006-0171	CWA	\$175,000,000	\$189,700,000	07/19/2006	Administrative Compliance Orders
8	SEWERAGE AND WATER BOARD OF NEW ORLEANS (LA0038091)	06-2006-1852	CWA	\$151,500,000	\$164,226,000	01/10/2006	Administrative Compliance Orders
9	CARGILL NATIONAL CASE	04-2004-9012, 05-2004-0706, 06-2004-3401, 07-2004-0313, 08-2004-0054	CAA	\$130,000,000	\$140,920,000	02/27/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
10	HARTFORD MDC	01-2004-2040	CWA	\$120,000,000	\$130,080,000	08/15/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
11	MINNKOTA POWER COOPERATIVE	08-2002-0040	CAA	\$105,000,000	\$113,820,000	07/27/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
12	NEW YORK, THE CITY OF	02-2002-0013	RCRA	\$94,800,000	\$102,763,200	03/27/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
13	DAIMLERCHRYSLER CORPORATION	EF-2004-4999	CAA	\$90,000,000	\$97,560,000	03/02/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
14	ATLANTIC RICHFIELD CORP., (MILLTOWN RESERVOIR SEDIMENT NPL)	08-1988-0117	CERCLA	\$87,000,000	\$94,308,000	02/08/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
15	BROCKTON WWTF	01-2003-0118	CWA	\$86,000,000	\$93,224,000	09/28/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
16	NASHUA CITY OF	01-2003-0163	CWA	\$65,000,000	\$70,460,000	12/28/2005	Consent Decree or Court Order Resolving a Civil Judicial Action
17	OMAHA LEAD SITE; UNION PACIFIC RAILROAD COMPANY	07-2005-0193	CERCLA	\$60,000,000	\$65,040,000	12/16/2005	Superfund Administrative Order For Cost Recovery
	HAWAII D.O.T. (STORM SEWER PERMITS)	09-2001-0029	CWA	\$60,000,000	\$65,040,000	01/30/2006	Consent Decree or Court Order Resolving a Civil Judicial Action



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19	READING, CITY OF SEWAGE TREATMENT PLANT	03-2002-0246	CWA	\$53,000,000	\$57,452,000	11/07/2005	Consent Decree or Court Order Resolving a Civil Judicial Action
20	BEAZER EAST, INC.	03-2006-0266	CERCLA	\$51,756,239	\$56,103,763	09/25/2006	Administrative Compliance Orders
21	NEW IBERIA, CITY OF WTP	06-2001-0273	CWA	\$50,000,000	\$54,200,000	10/26/2005	Consent Decree or Court Order Resolving a Civil Judicial Action
	UPPER COLUMBIA RIVER	10-2006-0340	CERCLA	\$50,000,000	\$54,200,000	06/02/2006	Administrative Compliance Orders
23	BEEDE WASTE OIL	01-2006-0203	CERCLA	\$48,000,000	\$52,032,000	06/16/2006	Administrative Compliance Orders
24	U.S. DEPARTMENT OF ENERGY'S OAK RIDGE RESERVATION	04-1991-9901	CERCLA	\$44,000,000	\$47,696,000	04/21/2006	Federal Facility Compliance Agreement (Not Including RCRA Matters)
25	CHICOPEE CITY OF	01-2002-0173	CWA	\$35,000,000	\$37,940,000	09/26/2006	Consent Decree or Court Order Resolving a Civil Judicial Action



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1	INDIANAPOLIS, CITY OF	05-2000-0583	CWA	\$1,860,000,000	\$1,969,740,000	12/19/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
2	PRASA V -PUERTO RICO AQUEDUCT AND SEWER AUTHORITY	02-2004-0008	CWA	\$1,701,100,000	\$1,801,464,900	01/10/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
3	PSE&G FOSSIL, LLC (CD AMENDMENT)	02-2001-0020	CAA	\$1,100,000,000	\$1,164,900,000	05/02/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
	SANITATION DISTRICT NO. 1 OF NORTHERN KENTUCKY	04-2005-9011	CWA	\$1,100,000,000	\$1,164,900,000	04/18/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
5	NEW YORK CITY DEPARTMENT OF ENVIRONMENTAL PROTECTION	02-2007-8024	SDWA	\$926,000,000	\$980,634,000	02/07/2007	Administrative Compliance Order
6	EAST KENTUCKY POWER COOPERATIVE (SPURLOCK & DALE PLANTS)	04-2003-9015	CAA	\$650,000,000	\$688,350,000	09/24/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
7	WISCONSIN ELECTRIC POWER COMPANY	05-2003-0333	CAA	\$620,000,000	\$656,580,000	09/30/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
8	CHARLOTTE, NC, CITY OF (CHARLOTTE-MECKLENBURG UTILITIES)	04-2007-4750	CWA	\$196,000,000	\$207,564,000	02/13/2007	Administrative Compliance Order
9	GENERAL ELECTRIC COMPANY	02-2005-0015	CERCLA	\$150,000,000	\$158,850,000	11/02/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
10	MIRANT CORPORATION	03-2002-0184	CAA	\$133,000,000	\$140,847,000	04/20/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
11	ALCOA, INC. - ROCKDALE OPERATIONS	06-2002-3712	CAA	\$131,123,000	\$138,859,257	02/27/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
12	HAMPTON ROADS SANITATION DISTRICT	03-2007-0277	CWA	\$126,500,000	\$133,963,500	08/01/2007	Administrative Compliance Order
13	FORT ORD	09-2007-0108	CERCLA	\$99,300,000	\$105,158,700	05/14/2007	Administrative Compliance Order
14	NEVADA POWER COMPANY	09-2005-0243	CAA	\$90,000,000	\$95,310,000	06/14/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
15	CITY OF SAN DIEGO SECOND	09-2003-0022	CWA	\$87,000,000	\$92,133,000	01/24/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
16	FT. MEADE, UNITED STATES DEPARTMENT OF THE ARMY	03-2007-0213	RCRA	\$73,917,570	\$78,278,707	08/27/2007	Administrative Compliance Order
17	NAVAL ACTIVITY PUERTO RICO (FORMERLY ROOSEVELT ROADS)	02-2007-7301	RCRA	\$71,156,000	\$75,354,204	01/29/2007	Administrative Compliance Order
18	WINCHESTER MUNICIPAL UTILITIES	04-2006-9008	CWA	\$67,420,000	\$71,397,780	04/10/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
19	NEVADA POWER COMPANY	09-2002-0120	CAA	\$60,400,000	\$63,963,600	08/13/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
20	DOE RUN TRANSPORTATION AND HAUL ROUTES	07-2007-0132	RCRA	\$55,300,000	\$58,562,700	05/09/2007	Administrative Compliance Order



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Rank	ICIS Enforcement Action Name	ICIS Enforcement Action Identifier	Primary Law	Cost of Complying Actions (Nominal)	Cost of Complying Actions (Inflation Adjusted to FY 10 Dollars)	Consent Decree Entry/ Final Order Issue Date	Final Order Type
21	MCCLELLAN AIR FORCE BASE (FFCA)	09-1990-0045	CERCLA	\$53,971,656	\$57,155,984	08/01/2007	Federal Facility Compliance Agreement (Not Including RCRA Matters)
22	OTIS AIR FORCE BASE/MASS MILITARY RESERVATION - LF 1	01-1996-0501	CERCLA	\$44,600,000	\$47,231,400	09/28/2007	Federal Facility Compliance Agreement (Not Including RCRA Matters)
23	LAWSON BROTHERS	09-2003-0076	RCRA	\$42,800,000	\$45,325,200	03/21/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
24	HARPER TRUCKS, INC	07-2007-0255	RCRA	\$42,000,000	\$44,478,000	09/25/2007	Administrative Penalty Order With or Without Injunctive Relief
25	RHODIA INC. (NATIONAL CASE)	05-2005-4549, 06-2006-3404, 09-2006-0122	CAA	\$41,805,000	\$44,271,495	07/23/2007	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	Cost of Complying Actions (Nominal)	Cost of Complying Actions (Inflation Adjusted to FY 10 Dollars)	Consent Decree Entry/ Final Order Issue Date	Final Order Type
1	AMERICAN ELECTRIC POWER CO (NATIONAL CASE)	03-1999-0388, 04-1999-9000, 05-1999-0644	CAA	\$4,636,000,000	\$4,700,904,000	12/10/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
2	ALLEGHENY COUNTY SANITARY AUTHORITY (ALCOSAN)	03-2000-0106	CWA NPDES	\$1,400,000,000	\$1,419,600,000	01/24/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
3	CITY OF SAN DIEGO FINAL	09-2003-0022	CWA NPDES	\$876,000,000	\$888,264,000	10/11/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
4	LAWRENCE LIVERMORE NATIONAL LAB	09-1992-0149	CERCLA	\$626,700,000	\$635,473,800	07/31/2008	Federal Facility Record of Decision (ROD)
5	BRAYTON POINT	01-2008-2021	CWA NPDES	\$500,000,000	\$507,000,000	12/17/2007	Administrative Compliance Orders
6	FOX RIVER UNILATERAL ADMIN ORDER	05-2008-0907	CERCLA	\$390,000,000	\$395,460,000	11/13/2007	Administrative Compliance Orders
7	CITY AND COUNTY OF HONOLULU	09-2004-0434	CWA NPDES	\$300,000,000	\$304,200,000	10/09/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
8	FORT WAYNE, CITY OF AND STATE OF INDIANA	05-2001-0633	CWA NPDES	\$250,000,000	\$253,500,000	04/01/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
9	PREMCO REFINING GROUP/VALERO ENERGY CO (NATIONAL CASE)	04-2007-9017, 05-2005-7981, 06-2004-3406, EF-2008-0008	CAA	\$231,010,000	\$234,244,140	11/20/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
10	AGRIFOS FERTILIZER, INC.	06-2007-0919	RCRA HW	\$216,600,000	\$219,632,400	03/28/2008	Administrative Compliance Orders
11	KENNECOTT SOUTH ZONE SUPERFUND SITE	08-2000-0216	CERCLA	\$197,000,000	\$199,758,000	05/21/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
12	LIBBY ASBESTOS SITE	08-2001-0055	CERCLA	\$191,000,000	\$193,674,000	06/02/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
13	DUPONT (NATIONAL CASE)	03-2004-0068, 04-2004-9041, 05-2003-0351, 06-2003-3339	CAA	\$153,200,000	\$155,344,800	01/24/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
14	FORT ORD OU 11 ROD (IMPACT AREA)	09-1990-0046	CERCLA	\$148,230,000	\$150,305,220	05/15/2008	Federal Facility Record of Decision (ROD)
15	EQUISTAR (NATIONAL CASE)	05-2004-0807, 06-2004-3409, 07-2005-0168	CAA	\$125,001,000	\$126,751,014	01/25/2008, 01/26/2008, 01/28/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
16	ATLANTIC RICHFIELD CORP., (MILLTOWN RESERVOIR SEDIMENT NPL)	08-1988-0117	CERCLA	\$97,000,000	\$98,358,000	08/21/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
17	JACKSONVILLE ASH & BROWN'S DUMP SUPERFUND ALTERNATIVE SITES (04-2008-C024)	04-2008-9004	CERCLA	\$95,200,000	\$96,532,800	07/17/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
18	OCCIDENTAL CHEMICAL CORPORATION, ET AL.	02-2008-2020	CERCLA	\$80,000,000	\$81,120,000	06/23/2008	Administrative Compliance Orders
19	SINCLAIR OIL COMPANY (NATIONAL CASE)	06-2002-3744, 08-2006-0074	CAA	\$73,432,550	\$74,460,606	06/30/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
20	SEMINOLE TRIBE OF FLORIDA	04-2008-0750	SDWA PWS	\$49,000,000	\$49,686,000	12/21/2007	Administrative Compliance Orders
21	HUNT REFINING COMPANY (04-2008-C004)	04-2004-9040	CAA	\$48,585,000	\$49,265,190	12/20/2007	Consent Decree or Court Order Resolving a Civil Judicial Action
22	METROPOLITAN WASTEWATER MANAGEMENT COMMISSION, CITY OF EUGENE, AND CITY OF SPRINGFIELD	10-2008-0057	CWA NPDES	\$40,500,000	\$41,067,000	03/03/2008	Administrative Compliance Orders
23	PRASA PUERTO NUEVO WWTP, SANTURCE SANITARY SEWER SYSTEM	02-2008-3155	CWA NPDES	\$37,000,000	\$37,518,000	09/05/2008	Administrative Compliance Orders
24	TOWN OF NEWBURGH	02-2006-0004	SDWA PWS	\$33,510,000	\$33,979,140	09/16/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
25	ORNOGO DUENWEG; BLUE TEE CORP; GOLD FIELDS MINING	07-2008-0179	CERCLA	\$30,500,000	\$30,927,000	07/03/2008	Administrative Compliance Orders



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1	TENNESSEE VALLEY AUTHORITY (TVA) KINGSTON FOSSIL FUEL PLANT RELEASE SITE	04-2009-3766	CERCLA	\$975,000,000	\$991,575,000	05/11/2009	Administrative Compliance Orders
2	ASARCO BANKRUPTCY (NATIONAL CASE)	05-2006-0728, 05-2006-0728, 06-1999-0228, 07-2009-0150, 08-2006-0119, 08-2006-0119, 08-2006-0119, 08-2006-0119, 09-2006-0123, 10-2006-0216, 10-2006-0216	CERCLA	\$611,032,562	\$621,420,116	6/5/2009, 6/9/2009, 7/9/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
3	SALT RIVER PROJECT - CORONADO	09-2007-0273	CAA	\$430,400,000	\$437,716,800	12/19/2008	Consent Decree or Court Order Resolving a Civil Judicial Action
4	METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY, TN	04-2006-9027	CWA	\$400,000,000	\$406,800,000	03/12/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
5	COMMONWEALTH UTILITIES CORPORATION	09-2007-0078	CWA	\$320,000,000	\$325,440,000	03/11/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
6	LOUISVILLE & JEFFERSON COUNTY METROPOLITAN SEWER DISTRICT, KY	04-2004-9027	CWA	\$300,000,000	\$305,100,000	02/15/2009	Administrative Penalty Orders with or without Injunctive Relief
7	INVISTA S.A.R.L (NATIONAL CASE)	03-2007-0284, 04-2006-9031, 06-2007-3410, HQ-2006-6007	CAA	\$242,901,296	\$247,030,618	07/29/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
8	BP NORTH AMERICA	06-2006-3402	CAA	\$161,000,000	\$163,737,000	09/18/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
9	KENTUCKY UTILITIES - E.W. BROWN (04-2009-C007)	04-2006-9012	CAA	\$147,000,000	\$149,499,000	03/18/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
10	U.S. DEPT OF ENERGY	02-1992-0294	CERCLA	\$142,000,000	\$144,414,000	04/01/2009	Federal Facility Record of Decision (ROD)
11	FRONTIER REFINING (NATIONAL CASE)	07-2006-0084, 08-2006-0073	CAA	\$127,405,000	\$129,570,885	03/26/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
12	EBMUD REFERRAL	09-2008-1522	CWA	\$88,000,000	\$89,496,000	07/22/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
13	PORTSMOUTH WWTP	01-2007-2027	CWA	\$70,300,000	\$71,495,100	09/24/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
14	HUNTER'S POINT OU 02 PARCEL B ROD AMENDMENT	09-1990-2500	CERCLA	\$44,000,000	\$44,748,000	01/28/2009	Enforceable Final Order Activity Producing Results
15	LOUISVILLE AND JEFFERSON COUNTY METROPOLITAN SEWER DISTRICT (04-2009-C015)	04-2007-9022	CWA	\$43,000,000	\$43,731,000	04/15/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
16	OTIS AIR FORCE BASE/MMR OU14	01-1996-0501	CERCLA	\$38,407,751	\$39,060,683	08/19/2009	Federal Facility Record of Decision (ROD)
17	CITY OF INDEPENDENCE	07-2008-0132	CWA	\$35,000,000	\$35,595,000	07/06/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
18	MIDNITE MINE UAO	10-2009-0026	CERCLA	\$33,000,000	\$33,561,000	11/18/2008	Administrative Compliance Orders
19	CITY OF SPENCER, IOWA	07-2009-0062	CWA	\$32,000,000	\$32,544,000	01/27/2009	Administrative Compliance Orders
20	UNION PACIFIC RAILROAD COMPANY	09-2006-0228	CWA	\$31,000,000	\$31,527,000	09/24/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
21	LEBANON WWTF	01-2007-2064	CWA	\$30,335,000	\$30,850,695	09/03/2009	Consent Decree or Court Order Resolving a Civil Judicial Action



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22	BLUE TEE CORP AND GOLD FIELDS MINING LLC	07-2008-0268	CERCLA	\$30,000,000	\$30,510,000	03/26/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
23	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND	01-2008-0529	CERCLA	\$29,900,000	\$30,408,300	03/26/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
24	SHPACK LANDFILL SUPERFUND SITE	01-2008-0520	CERCLA	\$29,000,000	\$29,493,000	01/27/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
25	HUNTER'S POINT OU 09 PARCEL G ROD	09-1990-2500	CERCLA	\$26,000,000	\$26,442,000	02/18/2009	Federal Facility Record of Decision (ROD)



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1	CITY OF KANSAS CITY, MISSOURI	07-2004-0333	CWA NPDES	<b>\$2,383,000,000</b>	09/27/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
2	HAMILTON COUNTY	05-1998-0750	CWA NPDES	<b>\$1,790,000,000</b>	08/10/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
3	NEW YORK CITY DEPARTMENT OF ENVIRONMENTAL PROTECTION	02-2010-8027	SDWA PWS	<b>\$1,600,000,000</b>	05/24/2010	Administrative Compliance Orders
4	LYONDELL CHEMICAL COMPANY, INC. ET AL. (NC)	02-2009-0015, 03-2009-7012, 04-2009-9025, 05-2009-1013, 06-2010-2886, 07-2009-0205, 09-2010-2519	CERCLA // RCRA HW	<b>\$1,023,946,608</b>	04/23/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
5	ENBRIDGE ENERGY PARTNERS, L.P. ORDER (MARSHALL) (CWA 311)	05-2010-1050	CWA 311	<b>\$600,000,000</b>	07/27/2010	Administrative Compliance Orders
6	WESTAR ENERGY, INC	07-2004-0319	CAA	<b>\$556,000,000</b>	03/26/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
7	HAMPTON ROADS SANITATION DISTRICT	03-2007-0145	CWA NPDES	<b>\$400,000,000</b>	02/23/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
8	LAFARGE NORTH AMERICA, INC. (NC)	02-2004-0024, 03-2005-0075, 04-2004-9039, 05-2004-0806, 06-2004-3407, 07-2005-0018, 10-2004-0257	CAA	<b>\$373,470,704</b>	03/18/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
9	EXXONMOBIL OIL CORPORATION	06-2010-0920	RCRA HW	<b>\$350,000,000</b>	09/27/2010	Administrative Penalty Order With or Without Injunctive Relief
10	FIRST ENERGY CORP/OHIO EDISON CO	05-1999-0645	CAA	<b>\$209,000,000</b>	03/01/2010	Judicial Order Amended
11	SEWERAGE AND WATER BOARD OF NEW ORLEANS	06-1993-0011	CWA NPDES	<b>\$200,000,000</b>	03/24/2010	Judicial Order Amended
12	PRASA VI (BACKWASH)	02-2004-0012	CWA NPDES	<b>\$195,000,000</b>	08/24/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
13	CF INDUSTRIES, INC.	04-2005-9032	RCRA HW	<b>\$168,300,000</b>	09/28/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
14	ANDERSON MUNICIPAL STP	05-2000-0630	CWA NPDES	<b>\$160,926,000</b>	05/18/2010	Judicial Order Amended



## National Enforcement Trends (NETs)

### Top 25 Civil Enforcement Cases in FY 2010 Based on Estimated Value of Complying Actions to be Taken in Response to EPA's Concluded Enforcement Actions

Rank	ICIS Enforcement Action Name	ICIS Enforcement Action Identifier	Primary Law	Cost of Complying Actions	Consent Decree Entry/ Final Order Issue Date	Final Order Type
15	PCS PHOSPHATES (WHITE SPRINGS, FL)	04-2010-4250	RCRA HW	<b>\$151,000,000</b>	06/02/2010	Administrative Compliance Orders
16	MAYOR AND CITY COUNCIL OF BALTIMORE	03-2010-0123	SDWA PWS	<b>\$137,000,000</b>	06/30/2010	Administrative Compliance Orders
17	CITY OF DULUTH/WESTERN LK SUPERIOR SD	05-2004-0638	CWA NPDES	<b>\$130,000,000</b>	10/05/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
18	CITY OF JEFFERSONVILLE	05-2005-0331	CWA NPDES	<b>\$125,000,000</b>	11/24/2009	Consent Decree or Court Order Resolving a Civil Judicial Action
19	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	<b>\$110,952,000</b>	05/07/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
20	CINERGY - GALLAGHER	05-2000-0201	CAA	<b>\$90,250,000</b>	03/19/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
21	CITY OF OSWEGO	02-2005-0011	CWA NPDES	<b>\$87,000,000</b>	08/05/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
22	STATE OF ALASKA, DOT AND PUBLIC FACILITIES - AMENDED JUDGMENT ON CONSENT DECREE	10-2006-0339	CWA NPDES	<b>\$48,855,000</b>	09/21/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
23	PLAINS PIPELINE/PLAINS MARKETING (NATIONAL CASE) (LEAD)	06-2005-4881, 07-2005-0092	CWA 311	<b>\$41,000,000</b>	09/20/2010	Consent Decree or Court Order Resolving a Civil Judicial Action
24	HUNTER'S POINT ROD OU 03 (FF)	09-1990-2500	CERCLA	<b>\$40,000,000</b>	09/20/2010	Federal Facility Record of Decision (ROD)
25	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	<b>\$38,028,655</b>	09/20/2010	Consent Decree or Court Order Resolving a Civil Judicial Action

## National Enforcement Trends (NETs) Metadata

NETs Page J-5: Top 25 Civil Enforcement Cases in FY 2006 - FY 2010 - Based on Estimated Value of Complying Actions to be Taken in Response to EPA's Concluded Enforcement Actions	
<b>Note 1</b>	<b>Complying Actions:</b> Direct, preventative, or facility management/information practice actions which owners/operators of a violating facility take in response to an enforcement action. Complying actions include injunctive relief ordered by a court or included in a settlement.
<b>Note 2</b>	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.
<b>Note 3</b>	For each enforcement case, the entire complying action amount for that case is attributed to the "primary law" that EPA has designated for the case, even where the action is brought under more than one law.
<b>Note 4</b>	High dollar values of complying action from a small number of enforcement settlements make up a large percentage of the injunctive relief reported 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 total injunctive relief (complying action) value reported in each of these FYs.
<b>Note 5</b>	ASARCO (American Smelting and Refining Company) is a bankruptcy case that EPA resolved with four individual settlements. There are three separate dates when the four settlements concluded. Two of the settlements involved multiple EPA regions. The Residual Sites Settlement involved Region 10 (Coeur d'Alene, ID Site) and Region 7 (Omaha Lead, NE site). The East Helena Settlement involved only Region 8 (East Helena NE site). The Miscellaneous Sites Settlement involved Region 10 (Jack Waite Mine, ID, and Tacoma, WA sites), Region 5 (Circle Smelting, IL), Region 6 (Stephenson Bennett, NM), and Region 8 (ILSE MINE (Terrible Mine), CO, Vasquez Blvd, CO, and Richardson Flat, UT sites). The Multistate Custodial Trust Settlement involved Region 5 (Circle Smelting, IL, Taylor Springs, IL, and Whiting, IN sites) and Region 8 (Globe Plant, CO and Murray Smelter, UT sites). The Hayden Superfund Site involved only Region 9 (Hayden, AZ site). (Some sites appear under more than one of the four settlements because the response cost (Injunctive Relief) was divided between multiple settlements.) The additional information for ASARCO can be found at: <a href="http://www.epa.gov/compliance/resources/cases/cleanup/cercla/asarco/index.html">http://www.epa.gov/compliance/resources/cases/cleanup/cercla/asarco/index.html</a> .
<b>Note 6</b>	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.