

**STATE OF RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**OFFICE OF COMPLIANCE & INSPECTION**

**IN RE: Khaliq Uzzaman  
Sadia Uzzaman  
OAKLAWN EXPRESS, LLC**

**FILE NO.: OCI-UST-19-52-00788**

NOTICE OF VIOLATION

A. Introduction

Pursuant to Sections 42-17.1-2(21) and 42-17.6-3 of the Rhode Island General Laws, as amended, (“R.I. Gen. Laws”) you are hereby notified that the Director of the Department of Environmental Management (the “Director” of “DEM”) has reasonable grounds to believe that the above-named parties (“Respondents”) have violated certain statutes and/or administrative regulations under DEM's jurisdiction.

B. Administrative History

On 20 August 2019, DEM issued a *Notice of Intent to Enforce* (“NIE”) by certified mail to Respondents for the violations that are the subject of this Notice of Violation (“NOV”). The NIE required specific actions to correct the violations. Respondents Khaliq and Sadia Uzzaman received the NIE on 23 August 2019, and Respondent OAKLAWN EXPRESS, LLC received the NIE on 24 August 2019. As of the date of the NOV, Respondents have failed to comply with the remedial requirements set forth by DEM in the NIE.

C. Facts

- (1) The subject property is located at 908 Oaklawn Avenue, Assessor’s Plat 15, Lot 74 in the City of Cranston, Rhode Island (the Property”). The Property includes a motor vehicle service station and a motor fuel storage and dispensing system (the “Facility”).
- (2) Respondents Khaliq Uzzaman and Sadia Uzzaman own the Property, taking title to the Property on or about 24 October 2018.
- (3) Respondent OAKLAWN EXPRESS, LLC is the operator of the Facility.
- (4) Underground storage tanks (“USTs” or “tanks”) are located on the Property, which tanks are used for storage of petroleum products and which are subject to the Rhode Island Code of Regulations titled *Rules and Regulations for Underground Storage Facilities Used for Regulated Substances and Hazardous Materials (250-RICR-140-25-1)* (the “UST Regulations”).

(5) The Facility is registered with DEM and is identified as UST Facility No. 00788.

(6) The USTs are registered with DEM for the Facility as follows:

UST ID No.	Date Installed	Capacity	Product Stored
002	27 October 1989	12,000 gallons	Gasoline
004	26 October 1989	12,000 gallons	Gasoline
006	26 October 1989	12,000 gallons	Gasoline
009	28 November 1989	1,000 gallons	Waste Oil
011	28 November 1989	1,000 gallons	No. 2 Heating Oil

(7) The previous owner of the Facility had DEM’s approval for the temporary closure of UST Nos. 002, 004 and 006. DEM’s temporary closure approval expired on 25 April 2018.

(8) By letter dated 28 November 2018, DEM notified Respondents of the testing and compliance verification requirements to obtain DEM’s permission to put the UST systems back into service.

(9) On 21 December 2018, NEXTEST, INC. (“NEXTEST”) notified DEM that they had performed tightness testing of the secondary product pipelines for UST Nos. 002, 004 and 006 on 18 December 2018. NEXTEST reported that the secondary product pipelines for UST Nos. 002 and 004 failed the tightness test, while the secondary pipeline for UST No. 006 passed.

(10) On 16 August 2019, DEM inspected the Facility and determined the following:

(a) UST Nos. 002, 004, 006 and 009 were not in service; and

(b) Respondents had not repaired or replaced the product pipelines for UST Nos. 002 and 004 in accordance with the UST Regulations.

(11) Upon information and belief, UST Nos. 002, 004, 006 and 009 have been out-of-service since Respondents Khaliq and Sadia Uzzaman took title to the Property.

(12) As of the date of the NOV, Respondents have failed to submit written verification that they had procured the services of a DEM-licensed tightness tester to test the primary product pipelines for UST Nos. 002 and 004 after the secondary pipelines had failed the 18 December 2018 tests.

(13) As of the date of the NOV, Respondents have failed to submit a *Release Characterization Report* to DEM.

- (14) As of the date of the NOV, Respondents have not obtained a temporary closure approval from DEM for UST Nos. 002, 004, 006 and 009 in accordance with the UST Regulations and DEM considers the tanks abandoned.

D. Violation

Based on the foregoing facts, the Director has reasonable grounds to believe that you have violated the following regulations:

- (1) **UST Regulations, Part 1.10(G)(2)(d)** – requiring tightness testing of primary product pipelines within 48 hours of a failed secondary product pipeline tightness test.
- (2) **UST Regulations, Part 1.10(G)(2)(d)(5)** – requiring either the repair or replacement of failed product pipelines within 60 days of the tightness test failure or the temporary closure of the effected UST systems.
- (3) **UST Regulations, Part 1.10(H)(6) and Part 1.14(G)(1)** – requiring owners/operators to submit a *Release Characterization Report* to DEM within 7 days of a failed tightness test.
- (4) **UST Regulations, Part 1.15(B)(1)** – prohibiting the abandonment of UST systems.

E. Order

Based upon the violations alleged above and pursuant to R.I. Gen. Laws Section 42-17.1-2(21), you are hereby ORDERED to complete the following remedial actions:

- (1) **Within 7 days of receipt of the NOV**, procure the services of a qualified contractor to evacuate the contents of UST Nos. 002, 004, 006 and 009 and their product pipelines. The tanks shall be evacuated to 1 inch or less of liquid at the bottom of the tanks and the fill port for each tank shall be locked. Written verification of compliance shall be submitted to DEM's Office of Compliance and Inspection ("OC&I").
- (2) **Within 7 days of receipt of the NOV**, submit a *Release Characterization Report* to OC&I in accordance with Part 1.10(H)(6) and Part 1.14(G)(1) of the UST Regulations.
- (3) **Within 60 days of receipt of the NOV**, submit a completed *Permanent Closure Application for USTs* to DEM's Office of Land Reclamation and Sustainable Materials Management ("LRSMM") and, **with LRSMM's consent and approval, complete the permanent closure of UST Nos. 002, 004, 006 and 009** in accordance with Part 1.15 of the UST Regulations.

- (4) **Within 30 days of the removal of the USTs**, a qualified environmental consultant shall complete and submit to LRSMM a *Closure Assessment Report* in accordance with Part 1.15(D)(10) of the UST Regulations, the UST *Closure Assessment Guidelines*, October 1998, and Part 2.13 of the Rhode Island Code of Regulations titled *Oil Pollution Control Regulations (250-RICR-140-25-2)* (the “OPC Regulations”).
- (5) **Within 30 days of the removal of the USTs**, remove and dispose of any contaminated soil encountered during the closure at a licensed solid waste management facility and, within 10 days of the soil disposal, submit documentation of disposal to LRSMM, in accordance with Part 2.13 of the OPC Regulations.
- (6) If, after review of the Closure Assessment Report, LRSMM determines that a site investigation is required, complete the site investigation and submit a Site Investigation Report (“SIR”) to LRSMM in accordance with Part 1.14(H) of the UST Regulations within the time frame specified by LRSMM.
- (7) If, after review of the SIR, LRSMM determines that a Corrective Action Plan (“CAP”) is required, complete a CAP in accordance with Part 1.14(I) of the UST Regulations within the time frame specified by LRSMM. The CAP shall be implemented in accordance with an Order of Approval that will be issued by LRSMM.

F. Penalty

- (1) Pursuant to R.I. Gen. Laws Section 42-17.6-2, the following administrative penalty, as more specifically described in the attached penalty summary and worksheets, is hereby ASSESSED, jointly and severally, against each named respondent:

**\$14,569**

- (2) The proposed administrative penalty is calculated pursuant to the Rhode Island Code of Regulations titled *Rules and Regulations for Assessment of Administrative Penalties (250-RICR-130-00-1)* and must be paid to DEM within 30 days of your receipt of the NOV. Payment shall be in the form of a certified check, cashier’s check or money order made payable to the “General Treasury - Water & Air Protection Program” and shall be forwarded to DEM’s Office of Compliance and Inspection, 235 Promenade Street, Suite 220, Providence, Rhode Island 02908-5767.
- (3) Penalties assessed against Respondents in the NOV are penalties payable to and for the benefit of the State of Rhode Island and are not compensation for actual pecuniary loss.

- (4) If any violation alleged herein shall continue, then each day during which the violation occurs or continues shall constitute a separate offense and the penalties and/or costs for that violation shall continue to accrue in the manner set forth in the attached penalty summary and worksheets. The accrual of additional penalties and costs shall be suspended if the Director determines that reasonable efforts have been made to comply promptly with the NOV.

G. Right to Administrative Hearing

- (1) Pursuant to R.I. Gen. Laws Chapters 42-17.1, 42-17.6, 42-17.7 and 42-35, each named respondent is entitled to request a hearing before DEM's Administrative Adjudication Division regarding the allegations, orders and/or penalties set forth in Sections B through F above. All requests for hearing MUST:
- (a) Be in writing. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and 42-17.6-4(b);
- (b) Be **RECEIVED** by DEM's Administrative Adjudication Division, at the following address, within 20 days of your receipt of the NOV. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and 42-17.7-9:

Administrative Clerk  
DEM - Administrative Adjudication Division  
235 Promenade Street, Suite 350  
Providence, RI 02908-5767

- (c) Indicate whether you deny the alleged violations and/or whether you believe that the administrative penalty is excessive. See R.I. Gen. Laws Section 42-17.6-4(b); **AND**
- (d) State clearly and concisely the specific issues which are in dispute, the facts in support thereof and the relief sought or involved, if any. See Part 1.7(B) of the Rhode Island Code of Regulations titled *Rules and Regulations for the Administrative Adjudication Division (250-RICR-10-00-1)*.

- (2) A copy of each request for hearing must also be forwarded to:

Joseph J. LoBianco, Esquire  
DEM - Office of Legal Services  
235 Promenade Street, Suite 425  
Providence, RI 02908-5767

- (3) Each named respondent has the right to be represented by legal counsel at all administrative proceedings relating to this matter.
- (4) Each respondent must file a separate and timely request for an administrative hearing before DEM's Administrative Adjudication Division as to each violation alleged in the written NOV. If any respondent fails to request a hearing in the above-described time or manner with regard to any violation set forth herein, then the NOV shall automatically become a Final Compliance Order enforceable in Superior Court as to that respondent and/or violation and any associated administrative penalty proposed in the NOV shall be final as to that respondent. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and (vi) and 42-17.6-4(b) and (c).
- (5) Failure to comply with the NOV may subject each respondent to additional civil and/or criminal penalties.
- (6) An original signed copy of the NOV is being forwarded to the City of Cranston, Rhode Island, wherein the Property is located, to be recorded in the Office of Land Evidence Records pursuant to R.I. Gen. Laws Chapter 34-13 and Section 42-17.1-2 (31), as amended.
- (7) The NOV does not preclude the Director from taking any additional enforcement action nor does it preclude any other local, state, or federal governmental entities from initiating enforcement actions based on the acts or omissions described herein.

If you have any legal questions, you may contact (or if you are represented by an attorney, please have your attorney contact) Joseph J. LoBianco of DEM's Office of Legal Services at (401) 222-6607. All other inquiries should be directed to Tracey Tyrrell of DEM's Office of Compliance and Inspection at (401) 222-1360 ext. 7407.

Please be advised that any such inquiries do not postpone, eliminate, or otherwise extend the need for a timely submittal of a written request for a hearing, as described in Section G above.

FOR THE DIRECTOR

By: \_\_\_\_\_  
David E. Chopy, Administrator  
DEM Office of Compliance and Inspection

Dated: \_\_\_\_\_

CERTIFICATION

I hereby certify that on the \_\_\_\_\_ day of \_\_\_\_\_  
the within Notice of Violation was forwarded to:

Khaliq Uzzaman  
880 Oaklawn Avenue  
Cranston, RI 02920-2641

Sadia Uzzaman  
880 Oaklawn Avenue  
Cranston, RI 02920-2641

OAKLAWN EXPRESS, LLC  
c/o Khaliq Uzzaman, Resident Agent  
72 Crest Drive  
Cranston, RI 02921

by Certified Mail.

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<b>ADMINISTRATIVE PENALTY SUMMARY</b>	
Program:	OFFICE OF COMPLIANCE AND INSPECTION, UST COMPLIANCE
File No.:	OCI-UST-19-52-00788
Respondents:	Khaliq Uzzaman, Sadia Uzzaman and OAKLAWN EXPRESS, LLC

<b>GRAVITY OF VIOLATION</b>					
SEE ATTACHED "PENALTY MATRIX WORKSHEETS."					
VIOLATION NO. & CITATION	APPLICATION OF MATRIX		PENALTY CALCULATION		AMOUNT
	Type	Deviation	Penalty from Matrix	Number or Duration of Violations	
D (1), (2) and (3) – Improper response to failed tightness tests	Type II <i>(\$12,500 Max. Penalty)*</i>	Moderate	\$2,500	1 violation	\$2,500
D (4) – Abandonment of USTs	Type I <i>(\$25,000 Max. Penalty)*</i>	Minor	\$2,500	4 USTs	\$10,000
<b>SUB-TOTAL</b>					<b>\$12,500</b>

\*Maximum Penalties represent the maximum penalty amounts per day, per violation.



## ADMINISTRATIVE PENALTY SUMMARY (continued)

<b>ECONOMIC BENEFIT FROM NON-COMPLIANCE</b>		
COSTS OF COMPLIANCE, EQUIPMENT, O&M, STUDIES OR OTHER DELAYED OR AVOIDED COSTS, INCLUDING INTEREST AND/OR ANY COMPETITIVE ADVANTAGE DERIVED OVER ENTITIES THAT COMPLY. NOTE: ECONOMIC BENEFIT MUST BE INCLUDED IN THE PENALTY UNLESS: - THERE IS NO IDENTIFIABLE BENEFIT FROM NONCOMPLIANCE; OR - THE AMOUNT OF ECONOMIC BENEFIT CAN NOT BE QUANTIFIED.		
<b>DESCRIPTION OF BENEFIT</b>	<b>CALCULATION</b>	<b>AMOUNT</b>
Failing to permanently close the USTs. The economic benefit of non-compliance was determined by using an EPA computer model titled <i>BEN</i> that performs a detailed economic analysis. The dates, dollar amounts and values used in this analysis are listed in this table.	<ul style="list-style-type: none"> <li>▪ Profit Status</li> <li>▪ Filing Status</li> <li>▪ Initial Capital Investment</li> <li>▪ One-time Non-depreciable Expense</li> <li>▪ First Month of Non-compliance</li> <li>▪ Compliance Date</li> <li>▪ Penalty Due Date</li> <li>▪ Useful Life of Pollution Control</li> <li>▪ Equipment Annual Inflation Rate</li> <li>▪ Discount Compound Rate</li> </ul>	Other than a C Corp.  \$50,000  April 2019 6/1/20 5/1/20   8.0%
<b><i>SUB-TOTAL</i></b>		<b>\$2,069</b>

<b>COST RECOVERY</b>
ADDITIONAL OR EXTRAORDINARY COSTS INCURRED BY THE DIRECTOR DURING THE INVESTIGATION, ENFORCEMENT AND RESOLUTION OF AN ENFORCEMENT ACTION (EXCLUDING NON-OVERTIME PERSONNEL COSTS), FOR WHICH THE STATE IS NOT OTHERWISE REIMBURSED.
A review of the record in this matter has revealed that DEM has not incurred any additional or extraordinary costs during the investigation, enforcement and resolution of this enforcement action (excluding non-overtime personnel costs), for which the State is not otherwise reimbursed.

**TOTAL PENALTY PROPOSED UNDER PENALTY REGULATIONS = \$14,569**

# PENALTY MATRIX WORKSHEET

CITATION: Improper response to failed tightness tests

VIOLATION NOs.: D (1), (2) and (3)

<b>TYPE</b>		
<p style="text-align: center;">_____ <b>TYPE I</b></p> <p><u>DIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;"><u>X</u> <b>TYPE II</b></p> <p><u>INDIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;">_____ <b>TYPE III</b></p> <p><u>INCIDENTAL</u> to protecting health, safety, welfare or environment.</p>
<b>DEVIATION FROM THE STANDARD</b>		
<p>THE DEGREE TO WHICH A PARTICULAR VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.</p>		
<p><b><u>FACTORS CONSIDERED:</u></b></p> <p>Taken from Part 1.10(A)(1)(b) of the Rhode Island Code of Regulations titled <i>Rules and Regulations for Assessment of Administrative Penalties (250-RICR-130-00-1)</i></p> <ol style="list-style-type: none"> <li>(1) <b>The extent to which the act or failure to act was out of compliance:</b> Respondents failed to submit written verification that the primary product pipelines for UST Nos. 002 and 004 were tested for tightness after the failed secondary product pipeline tightness tests. Respondents failed to submit a <i>Release Characterization Report</i> to DEM. Respondents failed to repair or replace the deficient pipelines. Failure to comply withholds vital information from the regulatory agency, which may hinder the agency’s mission of protecting public health and safety and the environment.</li> <li>(2) <b>Environmental conditions:</b> The Facility is located in a densely developed area with numerous potential vapor receptors including residential structures, commercial structures and underground utilities. The Facility is located in a GB groundwater classification zone, which are groundwater resources presumed to be unsuitable for drinking water use without treatment. The Facility is located within 160 feet of a GA groundwater classification zone, which are groundwater resources presumed to be suitable for drinking water use without treatment. Upon information and belief, there are no public or private drinking water supply wells proximate to the Facility. The USTs are installed within 1,200 feet of regulated freshwater wetlands. The Facility is in the Pawtuxet River watershed.</li> <li>(3) <b>Amount of the pollutant:</b> Considered, but not utilized for this calculation.</li> <li>(4) <b>Toxicity or nature of the pollutant:</b> The volatile nature of gasoline presents both a potential public health hazard (due to potential inhalation of benzene) and a potential public safety hazard (due to the potential for explosion). Gasoline can cause significant soil and groundwater contamination if released to the environment. Certain petroleum constituents are potentially harmful to human health and safety and the environment.</li> <li>(5) <b>Duration of the violation:</b> Approximately 1 1/2 years – Respondents should have had the primary product pipelines for UST Nos. 002 and 004 tested for tightness by 20 December 2018. Respondents should have submitted a <i>Release Characterization Report</i> to DEM by 26 December 2018. Respondents should have repaired the deficient piping before 18 February 2019.</li> <li>(6) <b>Areal extent of the violation:</b> Considered, but not utilized for this calculation.</li> </ol>		
<p>(continued)</p>		

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- (7) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the non-compliance:** Respondents failed to prevent the non-compliance when they failed to test the primary product pipelines, submit a *Release Characterization Report* to DEM or repair or replace the failed pipelines. Respondents have yet to mitigate the non-compliance despite receiving the NIE from DEM, which required that they do so.
- (8) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** Considered, but not utilized for this calculation.
- (9) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Negligence is attributable to Respondents for their failure to comply with the UST Regulations. Respondents, as owners and operators of the Facility, had full control over the occurrence of the violations.
- (10) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized for this calculation.

<b>MAJOR</b>	<u><b>X</b></u> <b>MODERATE</b>	<b>MINOR</b>
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$25,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	<b>MAJOR</b>	\$12,500 to \$25,000	\$6,250 to \$12,500	\$2,500 to \$6,250
	<b>MODERATE</b>	\$6,250 to \$12,500	\$2,500 to \$6,250 <b>\$2,500</b>	\$1,250 to \$2,500
	<b>MINOR</b>	\$2,500 to \$6,250	\$1,250 to \$2,500	\$250 to \$1,250

PENALTY MATRIX WORKSHEET		
CITATION:	Abandonment of USTs	
VIOLATION NO.:	D	(4)

TYPE		
<u>  X  </u> TYPE I DIRECTLY related to protecting health, safety, welfare or environment.	_____ TYPE II INDIRECTLY related to protecting health, safety, welfare or environment.	_____ TYPE III INCIDENTAL to protecting health, safety, welfare or environment.

**DEVIATION FROM THE STANDARD**  
THE DEGREE TO WHICH A PARTICULAR VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.

**FACTORS CONSIDERED:**

Taken from Part 1.10(A)(1)(b) of the Rhode Island Code of Regulations titled *Rules and Regulations for Assessment of Administrative Penalties (250-RICR-130-00-1)*

- (1) **The extent to which the act or failure to act was out of compliance:** Respondents have maintained UST Nos. 002, 004, 006 and 009 in an abandoned state since taking title to the Property. Abandonment of USTs is strictly prohibited by the UST Regulations. Abandoned USTs pose a threat to the environment if they are not properly evacuated of regulated substances or if owners/operators attempt to put them back into service after a prolonged period of neglect.
- (2) **Environmental conditions:** The Facility is located in a densely developed area with numerous potential vapor receptors including residential structures, commercial structures and underground utilities. The Facility is located in a GB groundwater classification zone, which are groundwater resources presumed to be unsuitable for drinking water use without treatment. The Facility is located within 160 feet of a GA groundwater classification zone, which are groundwater resources presumed to be suitable for drinking water use without treatment. Upon information and belief, there are no public or private drinking water supply wells proximate to the Facility. The USTs are installed within 1,200 feet of regulated freshwater wetlands. The Facility is located in the Pawtuxet River watershed.
- (3) **Amount of the pollutant:** Considered, but not utilized for this calculation.
- (4) **Toxicity or nature of the pollutant:** The volatile nature of gasoline presents both a potential public health hazard (due to potential inhalation of benzene) and a potential public safety hazard (due to the potential for explosion). Gasoline is capable of causing significant soil and groundwater contamination if released to the environment. Certain petroleum constituents are potentially harmful to human health and safety and the environment.
- (5) **Duration of the violation:** Approximately 1 ½ years – Respondents have maintained the USTs in an abandoned state since taking title to the Property on 24 October 2018. The previous owner abandoned the USTs on 25 April 2018. Upon information and belief, the USTs have been out of service since at least October of 2016, when the former owner first applied for temporary closure approval.
- (6) **Areal extent of the violation:** Considered, but not utilized for this calculation.

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- (7) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondents failed to prevent the non-compliance by obtaining DEM’s approval for temporary closure or by permanently closing the UST systems within 180 days of taking possession of the Facility. Respondents have yet to mitigate the non-compliance despite receiving the NIE from DEM, which required that they do so.
- (8) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** Considered, but not utilized for this calculation.
- (9) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Negligence is attributable to Respondents for the failure to comply with the UST Regulations. As owners and operators of the Facility, Respondents had full control over the occurrence of the violations. The requirements and procedures for obtaining DEM’s approval for temporary closure and the abandonment prohibitions are clearly established in the UST Regulations.
- (10) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Respondents had UST Nos. 002, 004, 006 and 009 tested for tightness on 18 December 2018 and they reportedly met the criteria for passing.

<b>MAJOR</b>	<b>MODERATE</b>	<u><b>X</b></u> <b>MINOR</b>
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$25,000		<b>TYPE I</b>	TYPE II	TYPE III
DEVIATION FROM STANDARD	<b>MAJOR</b>	\$12,500 to \$25,000	\$6,250 to \$12,500	\$2,500 to \$6,250
	<b>MODERATE</b>	\$6,250 to \$12,500	\$2,500 to \$6,250	\$1,250 to \$2,500
	<b>MINOR</b>	\$2,500 to \$6,250 <b>\$2,500</b>	\$1,250 to \$2,500	\$250 to \$1,250