

The minimum liability associated with economic benefit is approximately **\$30.80** $(\$28) \times (1.1)$). Because the Final Liability Amount exceeds 10% of the economic benefit, the Enforcement Policy requirement is satisfied.

The maximum administrative liability amount pursuant to Water Code section 13268 is one thousand dollars (\$1,000) for each day in which the violation occurs. Thus, the maximum liability amount is \$77,000 $(\$1,000 \text{ per day}) \times (77 \text{ days of violation})$.

Step 10. Final Liability Amount

Based on the foregoing analysis, and consistent with the Enforcement Policy, the final liability amount proposed for the failure to timely submit Monthly Reports, including staff costs, is **\$53,596**.

- Attachments:**
1. Penalty Calculation Methodology Spreadsheet
 2. U.S. EPA BEN Economic Benefit Analysis Table