



National Enforcement Trends (NETs)

Top Civil Penalty Cases of All Time

Current through EOY FY 2007

Rank	Enforcement Action Name	Enforcement Action Identifier	Primary Law Code	Federal Penalty Required	Consent Decree Entry/ Final Order Issue Date	Final Order Type
1	PALMETTO RECYCLING	04-2002-9068	CERCLA	\$92,345,000	3/16/2004	Consent Decree or Court Order Resolving a Civil Judicial Action
2	RUSSELL OIL COMPANY	06-2003-5317	RCRA	\$81,277,000	4/19/2005	Consent Decree or Court Order Resolving a Civil Judicial Action
3	COLONIAL PIPELINE COMPANY, INC.	04-1997-0525	CWA	\$34,000,000	6/16/2003	Consent Decree or Court Order Resolving a Civil Judicial Action
4	UNITED ORGANICS CORPORATION & MALCOLM LIEBERMAN	04-2004-9042	RCRA	\$32,759,000	5/17/2006	Consent Decree or Court Order Resolving a Civil Judicial Action
5	CATERPILLAR, INC.	HQ-1998-0303	CAA	\$18,750,000	7/1/1999	Consent Decree or Court Order Resolving a Civil Judicial Action
	CUMMINS ENGINE CO., INC.	HQ-1998-0306	CAA	\$18,750,000	7/1/1999	Consent Decree or Court Order Resolving a Civil Judicial Action
7	KOCH INDUSTRIES, INC.	06-1995-0015	CWA	\$15,000,000	3/7/2000	Consent Decree or Court Order Resolving a Civil Judicial Action
	TEXAS EASTERN TRANSMISSION CORPORATION	HQ-1988-0041	RCRA	\$15,000,000	10/7/1989	Consent Decree or Court Order Resolving a Civil Judicial Action
9	MACK TRUCKS, INC.	HQ-1998-0302	CAA	\$13,000,000	7/1/1999	Consent Decree or Court Order Resolving a Civil Judicial Action
10	SMITHFIELD FOODS, INC.	03-1996-0278	CWA	\$12,600,000	8/8/1997	Consent Decree or Court Order Resolving a Civil Judicial Action
11	DETROIT DIESEL CORP.	HQ-1998-0305	CAA	\$12,500,000	7/1/1999	Consent Decree or Court Order Resolving a Civil Judicial Action
12	TANNERY, ROGER L.	06-1990-0042	CERCLA	\$12,475,000	11/6/1992	Consent Decree or Court Order Resolving a Civil Judicial Action
13	FMC CORPORATION	10-1996-0069	RCRA	\$11,864,800	7/13/1999	Consent Decree or Court Order Resolving a Civil Judicial Action
14	LOUISIANA-PACIFIC	10-1991-0206	CAA	\$11,100,000	9/30/1993	Consent Decree or Court Order Resolving a Civil Judicial Action



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15	GENERAL MOTORS CORPORATION	HQ-1996-0001	CAA	\$11,000,000	11/30/1995	Consent Decree or Court Order Resolving a Civil Judicial Action
16	E.I. DUPONT DE NEMOURS AND COMPANY	HQ-2004-5108	TSCA	\$10,250,000	12/21/2005	Final Administrative Order
17	AMERICAN HONDA MOTOR, CO	HQ-1998-0104	CAA	\$10,100,000	9/22/1998	Consent Decree or Court Order Resolving a Civil Judicial Action
18	MORTON INTERNATIONAL, INC. National Case	04-1998-0459	RCRA	\$10,000,000	1/17/2001	Consent Decree or Court Order Resolving a Civil Judicial Action
19	I. JONES PARTNERSHIP, ET AL	05-1990-0055	CERCLA	\$9,663,884	8/26/1991	Consent Decree or Court Order Resolving a Civil Judicial Action
20	BP EXPLORATION AND OIL CORP/ BP AMOCO	05-2000-0586	CAA	\$9,500,000	8/29/2001	Consent Decree or Court Order Resolving a Civil Judicial Action
21	ILLINOIS POWER CO.	05-1999-0751	CAA	\$9,000,000	5/27/2005	Consent Decree or Court Order Resolving a Civil Judicial Action

National Enforcement Trends (NETs) Metadata

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Note 1	Large penalties from a small number of enforcement settlements make up a large percentage of the penalties obtained by EPA in most years. The cases on this list represent the top 21 enforcement cases, which were responsible for contributing a substantial percentage of the total penalties reported during the year their Consent Decrees/final orders were issued.
Note 2	Default judgment cases represented significant portions of civil judicial penalties in FY 04, 05 and 06: Palmetto Recycling in 04 comprised 62% of the EPA civil penalty total (\$149 million); Russell Oil Co. in 05 comprised 53% of the total (\$154 million); and United Organics in 06 comprised 26% of the total (\$124 million). A default judgment is "A judgment entered against a defendant who has failed to plead or otherwise defend against the plaintiff's claim." (Source: Black's Law Dictionary 449, 8th ed. 2004)