Krueger Investments, Inc. doing business as Technical Industrial Sales
Mark W. Eves, Registered Agent
3236 SW Kelly #200
Portland OR 97201

Re: Notice of Civil Penalty Assessment and Order
Case No. LQ/SW-NWR-2017-137

This letter is to inform you that DEQ has issued you a civil penalty of $44,679 for violations at your facility located at 18574 South Highway 99 in Oregon City where you manufacture putty, epoxy, stains and sealants for wood, along with metal coatings, inks and release agents.

DEQ issued this penalty because in February 2017, wastewater from your business discharged to a creek which flows to the Willamette River. The wastewater was white in color as a result of rinsing product totes and had the potential to change the biological and chemical properties of waters of state. The rinsing of the totes also resulted in the disposal of waste products onto the ground on the south side of your property. Additionally, stormwater generated at the facility is directed to a drainage culvert system which discharges to the Willamette River. Your operation is an activity which is required to obtain coverage under a stormwater discharge general permit. You have not applied for coverage.

Stormwater and wastewater discharges contain industrial pollutants that can damage aquatic species and their habitat and reduce the safety and usability of waterways. The stormwater permit requires facilities to implement stormwater control measures and monitor stormwater runoff so as to protect water quality and to minimize the amount of pollutants that could enter waters of the state.

Additionally, beginning in January 2017, you had disposed of approximately 20 cubic yards of useless putty on eastern edge of your property. In March, you arranged for the transportation and disposal of the putty and an additional approximate 100 cubic yards of waste at Parker Northwest Paving Co. in Canby Oregon, which is not permitted to accept solid waste.

Included in Section IV is an order requiring you to submit an application for coverage under the National Pollutant Discharge Elimination System General Permit Number 1200-Z within 30 days of the date of this Notice and Order, along with information regarding any hazardous wastes generated at your facility. If the industrial activities or materials at your facility will not be exposed to precipitation, you may be eligible for an exclusion from coverage in which case you can submit a no-exposure certification. You may contact Michael Kennedy at (503) 229-6843 for information about submitting either an application for coverage under the 1200-Z permit or the no-exposure certification. You may contact Jay Collins at (503) 229-5008 for information on the completion of a hazardous waste determination.
$18,246 of the civil penalty represents the economic benefit you gained by failing to apply for coverage under the stormwater general permit and to pay the annual fees associated with that permit. DEQ will consider recalculating the costs as delayed rather than avoided and reducing the civil penalty accordingly once you submit either an application or the no-exposure certification.

DEQ appreciates your efforts to ensure that future discharges into waters of the state do not occur by making changes in your procedures for rinsing product totes. DEQ considered these efforts when determining the amount of civil penalty.

If you wish to appeal this matter, DEQ must receive a request for a hearing within 20 calendar days from your receipt of this letter. The hearing request must be in writing. Send your request to DEQ Office of Compliance and Enforcement:
   Via mail – 700 NE Multnomah Street, Suite 600, Portland, Oregon 97232
   Via email – DEQappeals@deq.state.or.us
   Via fax – 503-229-5100
Once DEQ receives your request, we will arrange to meet with you to discuss this matter. If DEQ does not receive a timely written hearing request, the penalty will become due. Alternatively, you can pay the penalty by sending a check or money order to the above address. The attached Notice details DEQ’s reasons for issuing the penalty and provides further instructions for appealing the penalty. Please review and refer to it when discussing this case with DEQ.

DEQ may allow you to resolve part of the penalty by completing of a Supplemental Environmental Project which are environmental improvement projects that you sponsor. More information is available at http://www.oregon.gov/deq/Regulations/Pages/SEP.aspx or by calling the number below.

DEQ’s rules are available at http://www.oregon.gov/deq/Regulations/Pages/Statutes.aspx or by calling the number below.

If you have any questions, please contact Susan Elworth at 503-229-5152 or toll free in 800-452-4011, extension 5152.

Sincerely,

Sarah G. Wheeler, Acting Manager
Office of Compliance and Enforcement

Enclosures

cc: Jeremy Fleming, SW, NWR
    Jay Collins, HW, NWR
    Michael Kennedy, WQ, NWR
    Audrey Obrien, NWR, DEQ
    Christine Svetkovich, NWR, DEQ
    Shaumae Hall, Accounting, DEQ
    John Koestler, WQ, DEQ
BEFORE THE ENVIRONMENTAL QUALITY COMMISSION
OF THE STATE OF OREGON

IN THE MATTER OF:
KRUEGER INVESTMENTS, INC. doing business as TECHNICAL INDUSTRIAL SALES, a registered assumed business name, Respondent.

NOTICE OF CIVIL PENALTY ASSESSMENT AND ORDER
CASE NO. WQ/I-NWR-2017-137

I. AUTHORITY

The Department of Environmental Quality (DEQ) issues this Notice of Civil Penalty Assessment and Order (Notice) pursuant to Oregon Revised Statutes (ORS) 468.100 and 468.126 through 468.140, ORS Chapter 183, 459, 465 and 468B, and Oregon Administrative Rules (OAR) Chapter 340, Divisions 011, 012, 045, 093, 100 and 102.

II. FINDINGS OF FACT

1. Respondent owns and operates a manufacturing facility located at 18574 South Highway 99 in Oregon City, Oregon.

2. Respondent’s facility manufactures putty, epoxy, stains and sealants for wood, along with metal coatings, inks and release agents.

3. According to safety data sheets, the following products contain hazardous substances, (identified by the Chemical Abstracts Service number) as that term is defined under ORS 465.200(16)(b):

   - Green Ink Roll – Butyl benzyl phthalate, CAS #85-68-7
   - Black Ink Roll – Butyl benzyl phthalate, CAS #85-68-7
   - Blue Ink Roll – Butyl benzyl phthalate, CAS #85-68-7
   - Disappearing Ink – Sodium Hydroxide, CAS #1310-73-2; Phenolphthalein, CAS #77-09-8
   - Green Concentrate – Acetic Acid, CAS #64-19-7

4. In a letter dated June 6, 2017, DEQ requested that Respondent provide DEQ with hazardous waste determinations for each solid waste generated by Respondent and a calculation of waste generated each month. On July 11, 2017, Respondent provided to DEQ a hazardous waste
1 determination worksheet and safety data sheets for Respondent’s products. The determination
2 worksheet states that Respondent generates two solid wastes, wood filler and putty, and residual paints
3 and inks, and that neither is hazardous waste, but does not provide documentation to support that
4 assertion.

5. Since at least 1976, Respondent has been engaged in industrial activity with the primary
6 Standard Industrial Classification code of 2851 identified in “Table 1: Sources Covered” in the National
7 Pollutant Discharge Elimination System General Permit Number 1200-Z. DEQ has issued a 1200-Z
8 General Permit since 1998.

6. Stormwater runoff at the facility is directed to a culvert system which flows under Highway
9 99 and discharges to the Willamette River.

7. On February 15, 2017, Clackamas County staff observed a discharge of a white substance
8 from the south edge of the property into a creek which flows into the culvert system.

8. On February 22, 2017, DEQ staff observed a white substance and a pool of white liquid in
9 an area Respondent uses to rinse totes on the south side of the property. The white liquid was
10 discharging into a stormwater vault which discharges into a creek which flows into the culvert system.

9. As of the date of this Notice, Respondent has not been issued a permit allowing a discharge
10 into waters of the state, nor has Respondent applied for coverage under the 1200-Z General Permit.

10. On February 21, 2017, DEQ staff observed a pile of approximately 20 cubic yards of white
11 substance on the ground on the eastern edge of the property. The white substance was a putty product
12 which had been returned to Respondent as unusable in mid-January 2017.

11. As of the date of this Notice, Respondent has not been issued a solid waste permit by DEQ.

12. On March 2, 2017, Respondent disposed of 54 cubic yards of solid waste at Parker
13 Northwest Paving Co. in Canby, Oregon. Again on March 3, 2017, Respondent disposed of 72 cubic
14 yards of solid waste at Parker Northwest Paving Co. in Canby, Oregon. The solid waste Respondent
15 disposed of at Parker Northwest Paving Co. on March 2 and 3, 2017 included the pile of white
16 substance observed by DEQ in February 2017.

13. In March 2017, Parker Northwest Paving Co. had not been issued a solid waste permit by
14 DEQ.
14. Prior to disposing of the waste listed in paragraph 12, Respondent did not perform a hazardous waste determination on the waste.

III. CONCLUSIONS

1. On February 15, 2017 and again on February 22, 2017, Respondent violated ORS 468B.050(1)(a) by discharging waste into the waters of the state from an industrial or commercial activity without a permit, as alleged in Section II, paragraphs 1, 2, 7, 8 and 9. The creek is waters of the state, as defined in ORS 468B.005. These are Class I violations according to OAR 340-012-0055(1)(c). DEQ assessed a $11,400 civil penalty for these violations.

2. Since 1998, Respondent has violated ORS 468B.050(1)(d) and OAR 340-045-0033(6) by operating a discharge source or conducting an activity described in a general stormwater permit without first applying for coverage under that permit, as alleged in Section II, paragraphs 1, 2, 5, 6 and 9. This is a Class I violation according to OAR 340-012-0055(1)(d). DEQ assessed a $29,046 civil penalty for this violation.

3. Respondent violated OAR 340-093-0040(1) by disposing of solid waste at a site not permitted by DEQ to receive solid waste. As alleged in Section II, paragraphs 10-11, from January through March 2017, Respondent disposed of the white substance (which was a solid waste as it was unusable) at its property. As alleged in Section II, paragraph 12-13, in March 2017, Respondent then disposed of the white substance at Parker Northwest Paving Co. Neither Respondent nor Parker Northwest Paving Co. are permitted solid waste disposal sites. These are Class I violations according to OAR 340-012-0065(1)(c). DEQ assessed a $4,233 civil penalty for these violations.

4. Respondent violated ORS 465.250(1) by failing upon DEQ’s request, to provide information of the identification, nature, and volume of hazardous substances generated and stored at the property, as alleged in Section II, paragraphs 3 and 4. Specifically, Respondent failed to submit complete safety data sheets for its products which may contain hazardous substances or to submit a calculation of waste generated each month. This is a Class II violation according to OAR 340-012-0073(2). DEQ did not assess a civil penalty for this violation.

5. Respondent violated OAR 340-102-0011(2) by failing to conduct a complete and accurate
hazardous waste determination on a residue (as defined in OAR 340-100-0010(2)(ee)) it generated.

Specifically, Respondent failed to adequately determine and document whether residual inks which contain the substances listed in Section II, paragraph 3 (which are "hazardous substances" pursuant to ORS 465.200(16)(b)) are hazardous waste, by either testing the waste or applying knowledge of the waste in light of the materials or the processes used. Additionally, the white substance described in Section II, paragraphs 10 was a solid waste (as set forth in 40 CFR 261.2) as it was abandoned by being disposed of by Respondent. Respondent did not determine and document whether that waste was hazardous by either testing the waste or applying knowledge of the waste in light of the materials or processes used. This is a Class I violation according to OAR 340-012-0068(1)(a). DEQ did not assess a civil penalty for this violation.

IV. ORDER TO PAY CIVIL PENALTY AND TO COMPLY

Based upon the foregoing FINDINGS OF FACTS AND CONCLUSIONS, Respondent is hereby ORDERED TO:

1. Pay a total civil penalty of $44,679. The determinations of the civil penalties are attached as Exhibits 1, 2 and 3, and are incorporated as part of this Notice. If you do not file a request for hearing as set forth in Section V below, your check or money order must be made payable to "State Treasurer, State of Oregon" and sent to the DEQ, Business Office, 700 NE Multnomah Street, Suite 600, Portland, Oregon 97232. Once you pay the penalty, the Notice becomes final.

2. Within 30 days after the order becomes final by operation of law or on appeal, submit:
   a. A complete application for registration under the 1200-Z General Permit. Application materials and fees must be sent to: DEQ, Attn: Michael Kennedy, 700 NE Multnomah Blvd, Suite 600, Portland, OR 97232.
   
   b. Information regarding the identification, nature, volume and disposal of residues generated at the property which complies with OAR 340-102-0011. This information must be sent to: DEQ, Attn: Jay Collins, 700 NE Multnomah Blvd, Suite 600, Portland, OR 97232.

V. NOTICE OF RIGHT TO REQUEST A CONTESTED CASE HEARING

You have a right to a contested case hearing on this Notice, if you request one in writing. DEQ
must receive your request for hearing **within 20 calendar days** from the date you receive this Notice. If you have any affirmative defenses or wish to dispute any allegations of fact in this Notice or attached exhibit(s), you must do so in your request for hearing, as factual matters not denied will be considered admitted, and failure to raise a defense will be a waiver of the defense. (See OAR 340-011-0530 for further information about requests for hearing.) You must send your request to: DEQ, Office of Compliance and Enforcement, 700 NE Multnomah Street, Suite 600, Portland, Oregon 97232, fax it to 503-229-5100, or email it to DEQappeals@deq.state.or.us. An administrative law judge employed by the Office of Administrative Hearings will conduct the hearing, according to ORS Chapter 183, OAR Chapter 340, Division 011 and OAR 137-003-0501 to 0700. You have a right to be represented by an attorney at the hearing, however you are not required to be. If you are an individual, you may represent yourself. If you are a corporation, partnership, limited liability company, unincorporated association, trust or government body, you must be represented by an attorney or a duly authorized representative, as set forth in OAR 137-003-0555.

Active duty service-members have a right to stay proceedings under the federal Service Members Civil Relief Act. For more information, please call the Oregon State Bar at 1-800-452-8260 or the Oregon Military Department at 1-800-452-7500. Additional information can be found online at the United States Armed Forces Legal Assistance (AFLA) Legal Services Locator website http://legalassistance.law.af.mil/content/locator.php.

If you fail to file a timely request for hearing, the Notice will become a final order by default without further action by DEQ, as per OAR 340-011-0535(1). If you do request a hearing but later withdraw your request, fail to attend the hearing or notify DEQ that you will not be attending the hearing, DEQ will issue a final order by default pursuant to OAR 340-011-0535(3). DEQ designates the relevant portions of its files, including information submitted by you, as the record for purposes of proving a prima facie case.

10/16/17
Sarah G. Wheeler, Acting Manager Office of Compliance and Enforcement
EXHIBIT 1

FINDINGS AND DETERMINATION OF RESPONDENT’S CIVIL PENALTY PURSUANT TO OREGON ADMINISTRATIVE RULE (OAR) 340-012-0045

VIOLATION 1: Discharging waste into the waters of the state from an industrial or commercial activity without a permit, in violation of ORS 468B.050(1)(a).

CLASSIFICATION: This is a Class I violation pursuant to OAR 340-012-0055(1)(c).

MAGNITUDE: The magnitude of the violation is moderate pursuant to OAR 340-012-0130(1), as there is no selected magnitude specified in OAR 340-012-0135 applicable to this violation, and the information reasonably available to DEQ does not indicate a minor or major magnitude.

CIVIL PENALTY FORMULA: The formula for determining the amount of penalty of each violation is: \[ BP + [(0.1 \times BP) \times (P + H + O + M + C)] + EB \]

"BP" is the base penalty, which is $6,000 for a Class I, moderate magnitude violation in the matrix listed in OAR 340-012-0140(2)(b)(A)(ii) and applicable pursuant to OAR 340-012-0140(2)(a)(D). Respondent violated ORS 468B.050(1)(a) and does not have an NPDES permit.

"P" is whether Respondent has any prior significant actions, as defined in OAR 340-012-0030(19), in the same media as the violation at issue that occurred at a facility owned or operated by the same Respondent, and receives a value of 0 according to OAR 340-012-0145(2)(a)(A), because there are no prior significant actions.

"H" is Respondent’s history of correcting prior significant actions, and receives a value of 0 according to OAR 340-012-0145(3)(c) because there is no prior history.

"O" is whether the violation was repeated or ongoing, and receives a value of 2 according to OAR 340-012-0145(4)(b) because there was more than one but less than seven occurrences of the violation. The discharge was documented on two days, February 15, 2017 and February 22, 2017.

"M" is the mental state of the Respondent, and receives a value of 8 according to OAR 340-012-0145(5)(d) because Respondent’s conduct was reckless. Reckless means Respondent consciously disregarded a substantial and unjustifiable risk that the result would occur. The risk must be of such a nature and degree that disregarding that risk constituted a gross deviation from the standard of care a reasonable person would observe in that situation. Respondent informed DEQ that it knew that the white wastewater from rinsing totes onto the ground was entering the creek, yet it chose to not spend the money to change its process to prevent the discharge.

Case No. LQ/SW-NWR-2017-137
Exhibit 1
"C" is Respondent's efforts to correct or mitigate the violation, and receives a value of -1 according to OAR 340-012-0145(6)(e) because Respondent made reasonable efforts to ensure the violation would not be repeated. Respondent cleaned up the white substance from the ground surface.

"EB" is the approximate dollar value of the benefit gained and the costs avoided or delayed as a result of the Respondent’s noncompliance. It is designed to “level the playing field” by taking away any economic advantage the entity gained and to deter potential violators from deciding it is cheaper to violate and pay the penalty than to pay the costs of compliance. In this case, “EB” receives a value of $0. DEQ is unable to make an estimate of any costs delayed or avoided as a result of this violation.

**PENALTY CALCULATION:**

\[
\text{Penalty} = BP + [(0.1 \times BP) \times (P + H + O + M + C)] + EB
\]

\[
= 6,000 + [(0.1 \times 6,000) \times (0 + 0 + 2 + 8 - 1)] + 0
\]

\[
= 6,000 + (600 \times 9) + 0
\]

\[
= 6,000 + 5,400 + 0
\]

\[
= 11,400
\]
EXHIBIT 2

FINDINGS AND DETERMINATION OF RESPONDENT’S CIVIL PENALTY PURSUANT TO OREGON ADMINISTRATIVE RULE (OAR) 340-012-0045

VIOLATION 2: Operating a discharge source or conducting an activity described in a general stormwater permit without first applying for coverage under that permit, in violation of ORS 468B.050(1)(d) and OAR 340-045-0033(6).

CLASSIFICATION: This is a Class I violation pursuant to OAR 340-012-0055(1)(d).

MAGNITUDE: The magnitude of the violation is moderate pursuant to OAR 340-012-0130(1), as there is no selected magnitude specified in OAR 340-012-0135 applicable to this violation, and the information reasonably available to DEQ does not indicate a minor or major magnitude.

CIVIL PENALTY FORMULA: The formula for determining the amount of penalty of each violation is: BP + [(0.1 x BP) x (P + H + O + M + C)] + EB

"BP" is the base penalty, which is $6,000 for a Class I, moderate magnitude violation in the matrix listed in OAR 340-012-0140 (3)(b)(A)(ii) and applicable pursuant to OAR 340-012-0140(3)(a)(E)(iii). Respondent should have applied for coverage under the NPDES 1200-Z general permit.

"P" is whether Respondent has any prior significant actions, as defined in OAR 340-012-0030(19), in the same media as the violation at issue that occurred at a facility owned or operated by the same Respondent, and receives a value of 0 according to OAR 340-012-0145(2)(a)(A), because there are no prior significant actions.

"H" is Respondent’s history of correcting prior significant actions and receives a value of 0 according to OAR 340-012-0145(3)(c), because there is no prior history.

"O" is whether the violation was repeated or ongoing and receives a value of 4 according to OAR 340-012-0145(4)(b), because there were more than 28 occurrences of the violation. Respondent has been operating an activity covered by a stormwater general permit at its property since at least 1976. DEQ first issued a general permit in 1998.

"M" is the mental state of the Respondent, and receives a value of 2 according to OAR 340-012-0145(5)(b) because Respondent had constructive knowledge (reasonably should have known) of the requirement. In June 2017, DEQ informed Respondent that it needed to determine its SIC code and if required, to obtain coverage under a stormwater general permit. Respondent reported that its SIC code was 2851 which requires coverage under the general permit, yet Respondent has not applied for coverage under the stormwater permit.
"C" is Respondent's efforts to correct or mitigate the violation, and receives a value of 2 according to OAR 340-012-0145(6)(g) because Respondent did not address the violation as described in paragraphs (6)(a) through (6)(e) and the facts do not support a finding under paragraph (6)(f). Respondent has not applied for coverage under the general permit.

"EB" is the approximate dollar value of the benefit gained and the costs avoided or delayed as a result of the Respondent's noncompliance. It is designed to "level the playing field" by taking away any economic advantage the entity gained and to deter potential violators from deciding it is cheaper to violate and pay the penalty than to pay the costs of compliance. In this case, “EB” receives a value of $18,246. This is the amount Respondent gained by avoiding paying a permit application fee in 1998 of $1,081 and annual fees (ranging from $564 to $980 per year) since 1998. This “EB” was calculated pursuant to OAR 340-012-0150(1) using the U.S. Environmental Protection Agency’s BEN computer model.

PENALTY CALCULATION:

\[
\text{Penalty} = BP + [(0.1 \times BP) \times (P + H + O + M + C)] + EB
\]

\[
= $6,000 + [(0.1 \times $6,000) \times (0 + 0 + 4 + 2 + 2)] + $18,246
\]

\[
= $6,000 + ($600 \times 8) + $18,246
\]

\[
= $6,000 + $4,800 + $18,246
\]

\[
= $29,046
\]

Per OAR 340-012-0150(5), DEQ is treating the violation as extending over at least as many days as necessary to recover the economic benefit of the violation. The violation has been on-going since 1998.
EXHIBIT 3

FINDINGS AND DETERMINATION OF RESPONDENT’S CIVIL PENALTY
PURSUANT TO OREGON ADMINISTRATIVE RULE (OAR) 340-012-0045

VIOLATION 3: Disposing of solid waste at a site not permitted by DEQ to receive solid waste, in violation of OAR 340-093-0040(1).

CLASSIFICATION: This is a Class I violation pursuant to OAR 340-012-0065(1)(c).

MAGNITUDE: The magnitude of the violation is minor pursuant to OAR 340-012-0135(3)(a)(C) because the volume of material disposed of was less than 40 cubic yards.

CIVIL PENALTY FORMULA: The formula for determining the amount of penalty of each violation is: BP + [(0.1 x BP) x (P + H + O + M + C)] + EB

"BP" is the base penalty, which is $750 for a Class I, minor magnitude violation in the matrix listed in OAR 340-012-0140(4)(b)(A)(iii) and applicable pursuant to OAR 340-012-0140(4)(a)(A), because Respondent is not listed under another penalty matrix.

"P" is whether Respondent has any prior significant actions, as defined in OAR 340-012-0030(19), in the same media as the violation at issue that occurred at a facility owned or operated by the same Respondent, and receives a value of 0 according to OAR 340-012-0145(2)(a)(A), because there are no prior significant actions.

"H" is Respondent’s history of correcting prior significant actions and receives a value of 0 according to OAR 340-012-0145(3)(c), because there is no prior history.

"O" is whether the violation was repeated or ongoing and receives a value of 4 according to OAR 340-012-0145(4)(b), because the violation was on-going for more than 28 days. Respondent disposed of the pile of white putty on its property from mid-January 2017 until early March 2017, when Respondent disposed of the waste at another unpermitted site, Parker Northwest Paving.

"M" is the mental state of the Respondent, and receives a value of 8 according to OAR 340-012-0145(5)(d) because Respondent’s conduct was reckless. Reckless means that that Respondent consciously disregarded a substantial and unjustifiable risk that the result would occur. In 2014, Respondent received permission from Waste Management to dispose of water based paints and wood putty residues at Waste Management’s solid waste disposal facility. Based on that, Respondent knew waste putty is required to be disposed of at a permitted disposal facility. When Respondent disposed of unusable putty onto its property that was a gross deviation from the standard of care a reasonable person would have observed in that situation. Additionally, during the February inspection, DEQ informed Respondent that Parker Northwest Paving is only able to accept clean dirt and rock, yet
Respondent consciously disregarded an unjustifiable risk of by disposing of both dirt and waste putty at that facility.

"C" is Respondent's efforts to correct or mitigate the violation, and receives a value of 2 according to OAR 340-012-0145(6)(g) because Respondent did not address the violation as described in paragraphs (6)(a) through (6)(e) and the facts do not support a finding under paragraph (6)(f).

"EB" is the approximate dollar value of the benefit gained and the costs avoided or delayed as a result of the Respondent's noncompliance. It is designed to "level the playing field" by taking away any economic advantage the entity gained and to deter potential violators from deciding it is cheaper to violate and pay the penalty than to pay the costs of compliance. In this case, "EB" receives a value of $2,433. This is the amount Respondent gained by avoiding spending $3,872 to properly dispose of the solid waste. This "EB" was calculated pursuant to OAR 340-012-0150(1) using the U.S. Environmental Protection Agency's BEN computer model.

**PENALTY CALCULATION:**

\[
\text{Penalty} = \text{BP} + [(0.1 \times \text{BP}) \times (P + H + O + M + C)] + \text{EB} \\
= $750 + [(0.1 \times $750) \times (0 + 0 + 4 + 8 + 2)] + $2,433 \\
= $750 + ($75 \times 14) + $2,433 \\
= $750 + $1,050 + $2,433 \\
= $4,233
\]