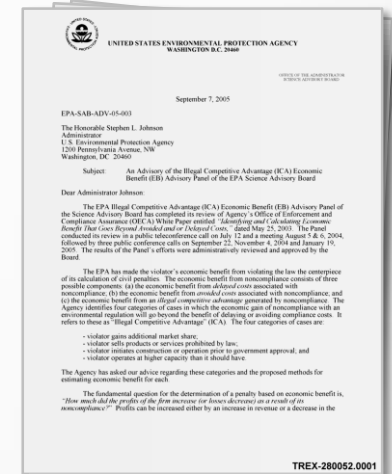


Absolute Deterrence

Object is to prevent all violations

Accomplished by eliminating all gain on the part of the violator

*EPA Science Advisory Board Report,
TRES-280052*



Anadarko received no economic benefit from violation and paid a share of OPA damages

No rationale for penalty based on absolute deterrence