

EXECUTIVE SUMMARY - ENFORCEMENT MATTER

Page 1 of 2

DOCKET NO.: 2006-1418-DCL-E TCEQ ID: RN102152014, RN103993382, and RN105002612 CASE NO.: 30932

RESPONDENT NAME: Chun H. Pae dba Ace Cleaners, Park Pavillion Cleaners, and Legacy Ranch Cleaners

ORDER TYPE:

<input checked="" type="checkbox"/> 1660 AGREED ORDER	<input type="checkbox"/> FINDINGS AGREED ORDER	<input type="checkbox"/> AMENDED ORDER	<input type="checkbox"/> IMMEDIATE AND SUBSTANTIAL ENDANGERMENT ORDER
<input type="checkbox"/> SHUTDOWN ORDER	<input type="checkbox"/> FINDINGS DEFAULT ORDER	<input type="checkbox"/> EMERGENCY ORDER	

CASE TYPE:

<input type="checkbox"/> AGRICULTURE	<input type="checkbox"/> AIR	<input type="checkbox"/> INDUSTRIAL AND HAZARDOUS WASTE	<input type="checkbox"/> MUNICIPAL SOLID WASTE
<input type="checkbox"/> OCCUPATIONAL CERTIFICATION	<input type="checkbox"/> PETROLEUM STORAGE TANKS	<input type="checkbox"/> PUBLIC WATER SUPPLY	<input type="checkbox"/> RADIOACTIVE WASTE
<input type="checkbox"/> MULTI-MEDIA (check all that apply)	<input type="checkbox"/> SEWAGE SLUDGE	<input type="checkbox"/> UNDERGROUND INJECTION CONTROL	<input type="checkbox"/> USED OIL
<input type="checkbox"/> USED OIL FILTER	<input type="checkbox"/> WATER QUALITY	<input checked="" type="checkbox"/> DRY CLEANER REGISTRATION	

SITE WHERE VIOLATION(S) OCCURRED: Ace Cleaners, 3100 Independence Parkway, Plano (Facility No. 1); Park Pavillion Cleaners, 2001 Coit Road, Suite 101, Plano (Facility No. 2); and Legacy Ranch Cleaners, 4851 Legacy Drive, Suite 308, Frisco (Facility No. 3), Collin County

TYPE OF OPERATION: Dry cleaning facilities and/or dry cleaning drop stations

SMALL BUSINESS: Yes No

OTHER SIGNIFICANT MATTERS: There are no complaints. There is no record of additional pending enforcement actions regarding these facility locations.

INTERESTED PARTIES: No one other than the ED and the Respondent has expressed an interest in this matter.

COMMENTS RECEIVED: The *Texas Register* comment period expired on January 15, 2007. No comments were received.

CONTACTS AND MAILING LIST:

TCEQ Attorney/SEP Coordinator: None

TCEQ Enforcement Coordinator: Mr. Jorge Ibarra, P.E., Enforcement Division, Enforcement Section II, MC R-04, (817) 588-5890; Mr. Steven Lopez, Enforcement Division, MC 219, (512) 239-1896

TCEQ Field Investigator: Ms. Martha Britton, DFW Regional Office, MC R-04, (817) 588-5811

Respondent: Mr. Chun H. Pae, Owner, Ace Cleaners, Park Pavillion Cleaners, and Legacy Ranch Cleaners, 2001 Coit Road, Suite 101, Plano, Texas 75075

Respondent's Attorney: Not represented by counsel on this enforcement matter

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>Type of Investigation: <input type="checkbox"/> Complaint <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Enforcement Follow-up <input checked="" type="checkbox"/> Records Review</p> <p>Date of Complaint Relating to this Case: None</p> <p>Dates of Investigations Relating to this Case: May 23, May 30, and August 28, 2006</p> <p>Dates of NOEs Relating to this Case: August 18, 2006, August 23, 2006, and August 29, 2006 (NOEs)</p> <p>Background Facts: These were routine investigations. Four violations were documented.</p> <p>WASTE</p> <p>1) Failed to renew the registration by completing and submitting the required registration form to the TCEQ for Facility No. 1 [30 TEX. ADMIN. CODE § 337.11(e) and TEX. HEALTH & SAFETY CODE § 374.102].</p> <p>2) Failed to renew the registration by completing and submitting the required registration form to the TCEQ for Facility No. 2 [30 TEX. ADMIN. CODE § 337.11(e) and TEX. HEALTH & SAFETY CODE § 374.102].</p> <p>3) Failed to complete and submit the required registration form to the TCEQ for Facility No. 3 [30 TEX. ADMIN. CODE § 337.10(a) and TEX. HEALTH & SAFETY CODE § 374.102].</p> <p>4) Failed to pay drycleaner fees for Fiscal Year ("FY") 2006 and associated late fees for Account No. 24001170 [30 TEX. ADMIN. CODE § 337.14(c) and TEX. WATER CODE § 5.702].</p>	<p>Total Assessed: \$3,555</p> <p>Total Deferred: \$711 <input checked="" type="checkbox"/> Expedited Settlement <input type="checkbox"/> Financial Inability to Pay</p> <p>SEP Conditional Offset: \$0</p> <p>Total Paid (Due) to General Revenue: \$237 (remaining \$2,607 due in 11 monthly payments of \$237 each)</p> <p>Site Compliance History Classification: <input type="checkbox"/> High <input type="checkbox"/> Avg. <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification: <input type="checkbox"/> High <input type="checkbox"/> Avg. <input type="checkbox"/> Poor</p> <p>Major Source: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Applicable Penalty Policy: September 2002</p>	<p>Corrective Actions Taken:</p> <p>1) The Executive Director recognizes that Mr. Pae has implemented the following corrective measures at the Facilities:</p> <p>a. Renewed the registration for Facility No. 1 by completing and submitting the required registration form to the TCEQ on August 24, 2006;</p> <p>b. Renewed the registration for Facility No. 2 by completing and submitting the required registration form to the TCEQ on June 16, 2006; and</p> <p>c. Completed and submitted the required registration form to the TCEQ for a dry cleaning and/or drop station for Facility No. 3 on September 11, 2006.</p> <p>Ordering Provisions:</p> <p>2) The Order will require the Respondent to:</p> <p>a. Within 30 days after the effective date of this Agreed Order, submit payment for all outstanding fees, including any associated penalties and interest; and</p> <p>b. Within 45 days after the effective date of this Agreed Order, submit written certification of compliance with Ordering Provision 2.a.</p>



DATES	Assigned	02-Sep-2006		
	PCW	13-Sep-2006	Screening	05-Sep-2006
			EPA Due	

RESPONDENT/FACILITY INFORMATION	
Respondent	Chun H. Pae dba Legacy Ranch Cleaners
Reg. Ent. Ref. No.	RN105002612
Facility/Site Region	4-Dallas/Fort Worth
Major/Minor Source	Minor Source

CASE INFORMATION			
Enf./Case ID No.	30932	No. of Violations	1
Docket No.	2006-1418-DCL-E	Order Type	1660
Media Program(s)	Drycleaner	Enf. Coordinator	Jorge Ibarra, P.E.
Multi-Media		EC's Team	Enforcement Team 4
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$50

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$1,185
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History	0% Enhancement	Subtotals 2, 3, & 7	\$0
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Notes: The respondent does not have any other enforcement actions within the last five years.

Culpability	No	0% Enhancement	Subtotal 4	\$0
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Notes: The respondent does not meet the culpability criteria.

Good Faith Effort to Comply	0% Reduction	Subtotal 5	\$0
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	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	X	(mark with a small x)

Notes: The respondent does not meet the good faith criteria.

Economic Benefit	0% Enhancement	Subtotal 6	\$0
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Total EB Amounts	\$13	*Capped at the Total EB \$ Amount
Approx. Cost of Compliance	\$250	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$1,185
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OTHER FACTORS AS JUSTICE MAY REQUIRE		Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

Notes:

Final Penalty Amount	\$1,185
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$1,185
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DEFERRAL	20% Reduction	Adjustment	\$237
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Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY	\$948
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Orders/Ace Cleaners Park Pavillion Cleaners/ Legacy Ranch Cleaners- Chun H Pae 2006-1418-dcl-e-qcp- Legacy Ranch Cleaners- 3
 Screening Date: 05-Sep-2006 Docket No. 2006-1418-DCL-E PCW
 Respondent: Chun H. Pae dba Legacy Ranch Cleaners Policy Revision 2 (September 2002)
 Case ID No. 30932 PCW Revision May 19, 2005
 Reg. Ent. Reference No. RN105002612
 Media [Statute] Drycleaner
 Enf. Coordinator Jorge Ibarra, P.E.

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action <i>(number of NOVs meeting criteria)</i>	0	0%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability <i>(number of orders meeting criteria)</i>	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government <i>(number of judgements or consent decrees meeting criteria)</i>	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government <i>(number of counts)</i>	0	0%
Emissions	Chronic excessive emissions events <i>(number of events)</i>	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 <i>(number of audits for which notices were)</i>	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 <i>(number of audits for which violations were disclosed)</i>	0	0%
Other	<i>Please Enter Yes or No</i>		
	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 0%

>> Repeat Violator (Subtotal 3)

No Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

N/A Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes The respondent does not have any other enforcement actions within the last five years.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 0%

Respondent Chun H. Pae dba Legacy Ranch Cleaners Policy Revision 2 (September 2002)
Case ID No. 30932 PCW Revision May 19, 2005
Reg. Ent. Reference No. RN105002612
Media [Statute] Drycleaner
Enf. Coordinator Jorge Ibarra, P.E.
Violation Number 1
Primary Rule Cite(s) 30 Tex. Admin. Code § 337.10(a)
Secondary Rule Cite(s) Tex. Health and Safety Code § 374.102
Violation Description The respondent failed to complete and submit the required registration form to the TCEQ for a dry cleaning and/or drop station facility.
Base Penalty \$50

>> **Environmental, Property and Human Health Matrix**

Release	Harm			Percent
	Major	Moderate	Minor	
Actual				
Potential				

>> **Programmatic Matrix**

Falsification	Major	Moderate	Minor	Percent
	X			10%

Matrix Notes: 100% of the rule requirement was not met.

Adjustment -\$45

Base Penalty Subtotal \$5

Violation Events

Number of Violation Events 237

mark only one use a small x

daily	X
monthly	
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$1,185

Two hundred thirty-seven daily events are recommended from the September 1, 2005 deadline to the April 26, 2006 deadline established by the TCEQ letter dated March 24, 2006.

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount \$13	Violation Final Penalty Total \$1,185
This violation Final Assessed Penalty (adjusted for limits) \$1,185	

Economic Benefit Worksheet

Respondent: Chun H. Pae dba Legacy Ranch Cleaners
 Case ID No. 30932
 Reg. Ent. Reference No. RN105002612
 Media [Statute]: Drycleaner
 Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs	\$250	01-Sep-2005	11-Sep-2006	1.0	\$13	n/a	\$13
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs: The estimated cost to register a dry cleaning or drop station facility annually. The date required is the date that the completed registration form was due and the final date is the date the respondent came into compliance.

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

TOTAL

Compliance History

Customer/Respondent/Owner-Operator: CN602480436 Chun H Pae Classification: N/A Rating:
Regulated Entity: RN105002612 LEGACY RANCH CLEANERS Classification: N/A Site Rating:
ID Number(s):
Location: 4851 LEGACY DR STE 308, FRISCO, TX, 75034
TCEQ Region: REGION 04 - DFW METROPLEX
Date Compliance History Prepared: September 08, 2006
Agency Decision Requiring Compliance History: Enforcement
Compliance Period: September 08, 2001 to September 08, 2006
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History
Name: Jorge Ibarra, P.E. Phone: (817) 588-5890

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? No
3. If Yes, who is the current owner? N/A
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)
1 08/29/2006 (488525)
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - I. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Dear Mr. [Name],

I have your letter of the 15th and am sorry that I cannot give you a more definite answer at this time. The matter is being reviewed and I will be in touch with you again as soon as a final decision has been reached.

I am sure that you will understand the need for thoroughness in this process. We are committed to providing the highest quality of service and ensuring that all our clients are satisfied with the results.

I will be sure to contact you again as soon as a final decision has been reached. In the meantime, please do not hesitate to contact me if you have any further questions or concerns.

Very truly yours,
[Signature]

[Name]
[Address]
[City, State, Zip]

Enclosed for you are the documents mentioned in my letter of the 15th. Please review them carefully and let me know if you need any further information.

I am sure that you will find this information helpful. Thank you for your patience and understanding.

Sincerely,
[Signature]



DATES	Assigned	19-Aug-2006	Screening	24-Aug-2006	EPA Due	
	PCW	28-Aug-2006				

RESPONDENT/FACILITY INFORMATION	
Respondent	Chun H. Pae dba Park Pavillion Cleaners
Reg. Ent. Ref. No.	RN103993382
Facility/Site Region	4-Dallas/Fort Worth
Major/Minor Source	Minor Source

CASE INFORMATION			
Enf./Case ID No.	30932	No. of Violations	2
Docket No.	2006-1418-DCL-E	Order Type	1660
Media Program(s)	Drycleaner	Enf. Coordinator	Jorge Ibarra, P.E.
Multi-Media		EC's Team	Enforcement Team 4
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$50

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$1,185
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History	0% Enhancement	Subtotals 2, 3, & 7	\$0
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Notes: The respondent does not have any other enforcement actions within the last five years.

Culpability	No	0% Enhancement	Subtotal 4	\$0
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Notes: The respondent does not meet the culpability criteria.

Good Faith Effort to Comply	0% Reduction	Subtotal 5	\$0
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	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	X	(mark with a small x)

Notes: The respondent does not meet the good faith criteria.

Economic Benefit	0% Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$10	*Capped at the Total EB \$ Amount
Approx. Cost of Compliance	\$250	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$1,185
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OTHER FACTORS AS JUSTICE MAY REQUIRE	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

Notes:

Final Penalty Amount	\$1,185
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$1,185
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DEFERRAL	20% Reduction	Adjustment	-\$237
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Reduces the Final Assessed Penalty by the indicted percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY	\$948
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Respondent Chun H. Pae dba Park Pavillion Cleaners Policy Revision 2 (September 2002)
Case ID No. 30932 PCW Revision May 19, 2005
Reg. Ent. Reference No. RN103993382
Media [Statute] Drycleaner
Enf. Coordinator Jorge Ibarra, P.E.

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Please Enter Yes or No

Adjustment Percentage (Subtotal 2) 0%

>> Repeat Violator (Subtotal 3)

No **Adjustment Percentage (Subtotal 3)** 0%

>> Compliance History Person Classification (Subtotal 7)

N/A **Adjustment Percentage (Subtotal 7)** 0%

>> Compliance History Summary

Compliance History Notes The respondent does not have any other enforcement actions within the last five years.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 0%

Respondent Chun H. Pae dba Park Pavillion Cleaners
Case ID No. 30932
Reg. Ent. Reference No. RN103993382
Media [Statute] Drycleaner
Enf. Coordinator Jorge Ibarra, P.E.

Policy Revision 2 (September 2002)
 PCW Revision May 19, 2005

Violation Number
Primary Rule Cite(s) 30 Tex. Admin. Code § 337.11(e)
Secondary Rule Cite(s) Tex. Health and Safety Code § 374.102
Violation Description The respondent failed to renew the facility's registration by completing and submitting the required registration form to the TCEQ for a dry cleaning and/or drop station facility.

Base Penalty

>> **Environmental, Property and Human Health Matrix**

		Harm			
Release		Major	Moderate	Minor	
OR	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text"/>
	Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>	

>> **Programmatic Matrix**

	Falsification	Major	Moderate	Minor	
	<input type="text"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Percent <input type="text" value="10%"/>
Matrix Notes	<input type="text" value="100% of the rule requirement was not met."/>				

Adjustment

Base Penalty Subtotal

Violation Events

Number of Violation Events

mark only one use a small x	daily	<input checked="" type="checkbox"/>
	monthly	<input type="checkbox"/>
	quarterly	<input type="checkbox"/>
	semiannual	<input type="checkbox"/>
	annual	<input type="checkbox"/>
	single event	<input type="checkbox"/>

Violation Base Penalty

Two hundred thirty-seven daily events are recommended from the September 1, 2005 deadline to the April 26, 2006 deadline established by the TCEQ letter dated March 24, 2006.

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount

Violation Final Penalty Total

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent: Chun H. Pae dba Park Pavillion Cleaners
 Case ID No: 30932
 Reg. Ent. Reference No: RN103993382
 Media [Statute]: Drycleaner
 Violation No: 1

Percent Interest	Years of Depreciation
5.0	15

Item	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Description No commas or \$

Delayed Costs

Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs	\$250	01-Sep-2005	16-Jun-2006	0.8	\$10	n/a	\$10
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs: The estimated cost to register a dry cleaning or drop station facility annually. The date required is the date that the completed registration form was due and the final date is the date the respondent came into compliance.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

TOTAL

Respondent Chun H. Pae dba Park Pavillion Cleaners

Policy Revision 2 (September 2002)

Case ID No. 30932

PCW Revision May 19, 2005

Reg. Ent. Reference No. RN103993382

Media [Statute] Drycleaner

Enf. Coordinator Jorge Ibarra, P.E.

Violation Number 2

Primary Rule Cite(s) 30 Tex. Admin. Code § 337.14(c)

Secondary Rule Cite(s) Tex. Water Code § 5.702

Violation Description Failure to pay drycleaner fees for Fiscal Year 2006 and associated late fees for Account No. 24001170.

Base Penalty \$50

>> Environmental, Property and Human Health Matrix

		Harm			Percent
Release		Major	Moderate	Minor	
OR	Actual				
	Potential				

>> Programmatic Matrix

		Falsification	Major	Moderate	Minor	Percent
Matrix Notes						

Adjustment -\$50

Base Penalty Subtotal \$0

Violation Events

Number of Violation Events

mark only one use a small x	daily	
	monthly	
	quarterly	
	semiannual	
	annual	
single event		

Violation Base Penalty \$0

No penalty is recommended because penalty and interest will be assessed at the next billing.

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$0

Violation Final Penalty Total \$0

This violation Final Assessed Penalty (adjusted for limits) \$0

Economic Benefit Worksheet

Respondent: Chun H. Pae dba Park Pavillion Cleaners
 Case ID No: 30932
 Reg. Ent. Reference No: RN103993382
 Media [Statute]: Drycleaner
 Violation No: 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0
Notes for DELAYED costs				N/A			

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance

TOTAL

Compliance History

Customer/Respondent/Owner-Operator:	CN602480436 Chun H Pae	Classification: N/A	Rating:
Regulated Entity:	RN103993382 PARK PAVILLION CLEANERS	Classification: N/A	Site Rating:
ID Number(s):			
Location:	2001 COIT RD STE 101, PLANO, TX, 75075		
TCEQ Region:	REGION 04 - DFW METROPLEX		
Date Compliance History Prepared:	August 23, 2006		
Agency Decision Requiring Compliance History:	Enforcement		
Compliance Period:	August 23, 2001 to August 23, 2006		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: (817) 588-5890 Phone: Jorge Ibarra, P.E.

Site Compliance History Components

- | | |
|--|-----|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | No |
| 3. If Yes, who is the current owner? | N/A |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)
1 08/18/2006 (488227)
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - I. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A



DATES	Assigned	19-Aug-2006			
	PCW	28-Aug-2006	Screening	24-Aug-2006	EPA Due

RESPONDENT/FACILITY INFORMATION					
Respondent	Chun H. Pae dba Ace Cleaners				
Reg. Ent. Ref. No.	RN102152014				
Facility/Site Region	4-Dallas/Fort Worth	Major/Minor Source	Minor Source		

CASE INFORMATION					
Enf./Case ID No.	30932	No. of Violations	1		
Docket No.	2006-1418-DCL-E	Order Type	1660		
Media Program(s)	Drycleaner	Enf. Coordinator	Jorge Ibarra, P.E.		
Multi-Media		EC's Team	Enforcement Team 4		
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$50		

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) **Subtotal 1** \$1,185

ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History 0% Enhancement **Subtotals 2, 3, & 7** \$0

Notes: The respondent does not have any other enforcement actions within the last five years.

Culpability No 0% Enhancement **Subtotal 4** \$0

Notes: The respondent does not meet the culpability criteria.

Good Faith Effort to Comply 0% Reduction **Subtotal 5** \$0

	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	X	(mark with a small x)

Notes: The respondent does not meet the good faith criteria.

Economic Benefit 0% Enhancement* **Subtotal 6** \$0

Total EB Amounts	\$12	*Capped at the Total EB \$ Amount
Approx. Cost of Compliance	\$250	

SUM OF SUBTOTALS 1-7 **Final Subtotal** \$1,185

OTHER FACTORS AS JUSTICE MAY REQUIRE **Adjustment** \$0

Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

Notes:

Final Penalty Amount \$1,185

STATUTORY LIMIT ADJUSTMENT **Final Assessed Penalty** \$1,185

DEFERRAL 20% Reduction **Adjustment** -\$237

Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY **\$948**

Respondent: Chun H. Pae dba Ace Cleaners
 Case ID No: 30932
 Reg. Ent. Reference No: RN102152014
 Media [Statute]: Drycleaner
 Enf. Coordinator: Jorge Ibarra, P.E.

Policy Revision 2 (September 2002)
 PCW Revision May 19, 2005

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	0	0%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgements or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were</i>	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Please Enter Yes or No

Adjustment Percentage (Subtotal 2) 0%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

N/A

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

The respondent does not have any other enforcement actions within the last five years.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 0%

Respondent Chun H. Pae dba Ace Cleaners Policy Revision 2 (September 2002)
Case ID No. 30932 PCW Revision May 19, 2005
Reg. Ent. Reference No. RN102152014
Media [Statute] Drycleaner
Enf. Coordinator Jorge Ibarra, P.E.

Violation Number 1
Primary Rule Cite(s) 30 Tex. Admin. Code § 337.11(e)
Secondary Rule Cite(s) Tex. Health and Safety Code § 374.102
Violation Description The respondent failed to renew the facility's registration by completing and submitting the required registration form to the TCEQ for a dry cleaning and/or drop station facility.

Base Penalty \$50

>> **Environmental, Property and Human Health Matrix**

		Harm			
Release		Major	Moderate	Minor	
OR	Actual				Percent
	Potential				

>> **Programmatic Matrix**

	Falsification	Major	Moderate	Minor	
		x			Percent 10%

Matrix Notes 100% of the rule requirement was not met.

Adjustment -\$45

Base Penalty Subtotal \$5

Violation Events

Number of Violation Events 237

mark only one use a small x

daily	x
monthly	
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$1,185

Two hundred thirty-seven daily events are recommended from the September 1, 2005 deadline to the April 26, 2006 deadline established by the TCEQ letter dated March 24, 2006.

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount \$12	Violation Final Penalty Total \$1,185
This violation Final Assessed Penalty (adjusted for limits) \$1,185	

Economic Benefit Worksheet

Respondent: Chun H. Pae dba Ace Cleaners
 Case ID No: 30932
 Reg. Ent. Reference No: RN102152014
 Media [Statute]: Drycleaner
 Violation No: 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs	\$250	01-Sep-2005	24-Aug-2006	1.0	\$12	n/a	\$12
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs: The estimated cost to register a dry cleaning or drop station facility annually. The date required is the date that the completed registration form was due and the final date is the date the respondent came into compliance.

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs:

Approx. Cost of Compliance TOTAL

Compliance History

Customer/Respondent/Owner-Operator:	CN602480436 Chun H Pae	Classification: N/A	Rating:
Regulated Entity:	RN102152014 ACE CLEANERS	Classification: N/A	Site Rating:
<hr/>			
ID Number(s):			
Location:	3100 INDEPENDENCE PKWY, PLANO, TX, 75075		
TCEQ Region:	REGION 04 - DFW METROPLEX		
Date Compliance History Prepared:	August 23, 2006		
Agency Decision Requiring Compliance History:	Enforcement		
Compliance Period:	August 23, 2001 to August 23, 2006		

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Jorge Ibarra, P.E. Phone: (817) 588-5890

Site Compliance History Components

- | | |
|--|-----|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | No |
| 3. If Yes, who is the current owner? | N/A |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
 - B. Any criminal convictions of the state of Texas and the federal government.
N/A
 - C. Chronic excessive emissions events.
N/A
 - D. The approval dates of investigations. (CCEDS Inv. Track. No.)
1 08/18/2006 (488317)
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
N/A
 - F. Environmental audits.
N/A
 - G. Type of environmental management systems (EMSs).
N/A
 - H. Voluntary on-site compliance assessment dates.
N/A
 - I. Participation in a voluntary pollution reduction program.
N/A
 - J. Early compliance.
N/A
- Sites Outside of Texas
N/A

Introduction

The purpose of this document is to provide a comprehensive overview of the project's objectives, scope, and timeline. It is intended for all stakeholders involved in the project, including team members, management, and external partners.

The project aims to develop a new software application that will streamline our internal processes and improve efficiency. The scope of the project includes the design, development, testing, and deployment of the application. The timeline for the project is estimated to be 12 weeks, starting from the beginning of the month and ending by the end of the quarter.

Project Objectives

- Develop a user-friendly interface that is easy to navigate and use.
- Ensure the application is secure and meets all data protection requirements.
- Integrate the application with existing systems to ensure seamless data flow.
- Conduct thorough testing to identify and resolve any bugs or issues.
- Provide comprehensive training and support for users.

The project team consists of a project manager, a software developer, a quality assurance specialist, and a user experience designer. Each team member has specific responsibilities and will work closely together to ensure the project's success.

The project budget is estimated to be \$50,000, covering all costs related to development, testing, and deployment. The budget is subject to change based on the project's progress and any unforeseen circumstances.

The project is currently in the planning phase, and we expect to begin development in the next few weeks. We will provide regular updates on the project's progress and any changes to the timeline or budget.

We are committed to delivering a high-quality application that meets our needs and those of our users. We welcome any feedback or suggestions from stakeholders throughout the project's lifecycle.

Thank you for your interest in this project. We look forward to working with you to achieve our goals.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	
CHUN H. PAE DBA ACE CLEANERS,	§	
PARK PAVILLION CLEANERS, AND	§	TEXAS COMMISSION ON
LEGACY RANCH CLEANERS	§	
RN102152014, RN103993382, AND	§	
RN105002612	§	ENVIRONMENTAL QUALITY

AGREED ORDER
DOCKET NO. 2006-1418-DCL-E

I. JURISDICTION AND STIPULATIONS

At its _____ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Chun H. Pae dba Ace Cleaners, Park Pavillion Cleaners, and Legacy Ranch Cleaners ("Mr. Pae") under the authority of TEX. HEALTH & SAFETY CODE ch. 374 and TEX. WATER CODE chs. 5 and 7. The Executive Director of the TCEQ, through the Enforcement Division, and Mr. Pae appear before the Commission and together stipulate that:

1. Mr. Pae owns and operates dry cleaning facilities and/or dry cleaning drop stations at the following locations ("the Facilities"):
 - a. Ace Cleaners, 3100 Independence Parkway, Plano, Collin, Texas ("Facility No. 1");
 - b. Park Pavillion Cleaners, 2001 Coit Road, Suite 101, Plano, Collin County, Texas ("Facility No. 2"); and
 - c. Legacy Ranch Cleaners, 4851 Legacy Drive, Suite 308, Frisco, Collin County, Texas ("Facility No. 3").
2. The TCEQ has general authority to regulate the Facilities pursuant to TEX. HEALTH & SAFETY CODE § 374.051.
3. The Commission and Mr. Pae agree that the Commission has jurisdiction to enter this Agreed Order, and that Mr. Pae is subject to the Commission's jurisdiction.
4. Mr. Pae received notices of the violations alleged in Section II ("Allegations") on or about August 23, 2006, August 28, 2006, and September 3, 2006.

5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Mr. Pae of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of Three Thousand Five Hundred Fifty-Five Dollars (\$3,555) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Mr. Pae has paid Two Hundred Thirty-Seven Dollars (\$237) of the administrative penalty and Seven Hundred Eleven Dollars (\$711) is deferred contingent upon Mr. Pae's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If Mr. Pae fails to timely and satisfactorily comply with all requirements of this Agreed Order, including the payment schedule, the Executive Director may require Mr. Pae to pay all or part of the deferred penalty.

The remaining amount of Two Thousand Six Hundred Seven Dollars (\$2,607) of the administrative penalty shall be payable in eleven (11) monthly payments of Two Hundred Thirty-Seven Dollars (\$237) each. The next monthly payment shall be paid within 30 days after the effective date of this Agreed Order. The subsequent payments shall each be paid not later than 30 days following the due date of the previous payment until paid in full. If Mr. Pae fails to timely and satisfactorily comply with the payment requirements of this Agreed Order, the Executive Director may, at the Executive Director's option, accelerate the maturity of the remaining installments, in which event the unpaid balance shall become immediately due and payable without demand or notice. In addition, the failure of Mr. Pae to meet the payment schedule of this Agreed Order constitutes the failure by Mr. Pae to timely and satisfactorily comply with all the terms of this Agreed Order.

7. Any notice and procedures which might otherwise be authorized or required in this action are waived in the interest of a more timely resolution of the matter.
8. The Executive Director of the TCEQ and Mr. Pae have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
9. The Executive Director recognizes that Mr. Pae has implemented the following corrective measures at the Facilities:
 - a. Renewed the registration for Facility No. 1 by completing and submitting the required registration form to the TCEQ on August 24, 2006;
 - b. Renewed the registration for Facility No. 2 by completing and submitting the required registration form to the TCEQ on June 16, 2006; and
 - c. Completed and submitted the required registration form to the TCEQ for a dry cleaning and/or drop station for Facility No. 3 on September 11, 2006.
10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that Mr. Pae has not complied with one or more of the terms or conditions in this Agreed Order.

The first part of the study focuses on the theoretical framework and the research objectives. It discusses the importance of understanding the underlying mechanisms of the phenomenon being studied and the need for a comprehensive approach to data analysis.

The methodology section describes the data collection process, including the selection of participants and the use of standardized instruments. It also details the statistical methods employed to analyze the data, ensuring the reliability and validity of the findings.

The results section presents the findings of the study, highlighting the key differences between the experimental groups. The data indicates a significant correlation between the variables under investigation, supporting the hypotheses of the study.

The discussion section interprets the results in the context of existing literature, providing insights into the implications of the findings. It also addresses the limitations of the study and suggests directions for future research.

The conclusion summarizes the main findings and reiterates the significance of the study. It emphasizes the need for further exploration in this field to advance our understanding of the subject matter.

References

Appendix A

Appendix B

Appendix C

11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

As owner and operator of the Facilities, Mr. Pae is alleged to have:

1. Failed to renew the registration by completing and submitting the required registration form to the TCEQ for Facility No. 1, in violation of 30 TEX. ADMIN. CODE § 337.11(e) and TEX. HEALTH & SAFETY CODE § 374.102, as documented during inspections conducted on May 23, 2006.
2. Failed to renew the registration by completing and submitting the required registration form to the TCEQ for Facility No. 2, in violation of 30 TEX. ADMIN. CODE § 337.11(e) and TEX. HEALTH & SAFETY CODE § 374.102, as documented during inspections conducted on May 23, 2006.
3. Failed to complete and submit the required registration form to the TCEQ for Facility No. 3, in violation of 30 TEX. ADMIN. CODE § 337.10(a) and TEX. HEALTH & SAFETY CODE § 374.102, as documented during inspections conducted on May 30, 2006.
4. Failed to pay drycleaner fees for Fiscal Year ("FY") 2006 and associated late fees for Account No. 24001170, in violation of 30 TEX. ADMIN. CODE § 337.14(c) and TEX. WATER CODE § 5.702, as documented during a record review conducted on August 28, 2006.

III. DENIALS

Mr. Pae generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Mr. Pae pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Mr. Pae's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Chun H. Pae dba Ace Cleaners, Park Pavillion Cleaners, and Legacy Ranch Cleaners, Docket No. 2006-1418-DCL-E" to:

...the ... of ...

Financial Administration Division, Revenues Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088

2. It is further ordered that Mr. Pae shall undertake the following technical requirements:
- a. Within 30 days after the effective date of this Agreed Order, submit payment for all outstanding fees, including any associated penalties and interest and with the notation, "Chun H. Pae dba Ace Cleaners, Park Pavillion Cleaners, and Legacy Ranch Cleaners - Financial Account No. 24001170", to the address listed in Ordering Provision No. 1; and
 - b. Within 45 days after the effective date of this Agreed Order, submit written certification of compliance with Ordering Provision 2.a. as described below:

The certification shall, include detailed supporting documentation including receipts, and/or other records to demonstrate compliance, be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

Waste Section Manager
Dallas-Fort Worth Regional Office
Texas Commission on Environmental Quality
2309 Gravel Drive
Dallas-Fort Worth, Texas 76118

Dear Sir,

I am writing to you regarding the matter of the contract for the supply of goods to the Government of Karnataka.

The contract was awarded to your company on the basis of the lowest bid. However, it has been observed that the quality of the goods supplied does not meet the requirements specified in the contract documents.

Therefore, the contract is being terminated with immediate effect. All goods supplied under the contract shall be returned to your company at your expense.

You are requested to take necessary steps to ensure that the quality of goods supplied in future contracts meets the required standards.

Yours faithfully,
[Signature]

Director,
Public Procurement Cell,
Government of Karnataka.

[Signature]

Date: / /

Enclosed herewith are the contract documents and the invoice for the goods supplied.

3. The provisions of this Agreed Order shall apply to and be binding upon Mr. Pae. Mr. Pae is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facilities operations referenced in this Agreed Order.
4. If Mr. Pae fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, Mr. Pae's failure to comply is not a violation of this Agreed Order. Mr. Pae shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Mr. Pae shall notify the Executive Director within seven days after Mr. Pae becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
5. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by Mr. Pae shall be made in writing to the Executive Director. Extensions are not effective until Mr. Pae receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
6. This Agreed Order, issued by the Commission, shall not be admissible against Mr. Pae in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
7. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
8. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to Mr. Pae, or three days after the date on which the Commission mails notice of the Order to Mr. Pae, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that this is essential for ensuring transparency and accountability in the organization's operations.

2. The second part of the document outlines the various methods and tools used to collect and analyze data. It highlights the need for consistent and reliable data collection processes to ensure the validity of the findings.

3. The third part of the document describes the results of the data analysis and the key findings. It identifies the main trends and patterns observed in the data, as well as the implications of these findings for the organization's strategy and operations.

4. The fourth part of the document discusses the limitations of the study and the potential areas for future research. It acknowledges the constraints of the data and the methods used, and suggests ways in which the study could be expanded or refined in the future.

5. The fifth part of the document provides a conclusion and a summary of the key points. It reiterates the importance of the findings and the need for continued monitoring and evaluation of the organization's performance.

6. The sixth part of the document includes a list of references and a list of appendices. The references provide a list of the sources used in the study, and the appendices contain additional information and data that are relevant to the study.

7. The seventh part of the document is a list of figures and tables. These provide a visual representation of the data and the results of the analysis, making it easier to understand the findings and trends.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission



For the Executive Director

2/10/07

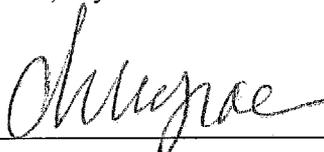
Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity, if any, indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that my failure to comply with the Ordering Provisions, if any, in this order and/or my failure to timely pay the penalty amount, may result in:

- A negative impact on my compliance history;
- Greater scrutiny of any permit applications submitted by me;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions against me;
- Automatic referral to the Attorney General's Office of any future enforcement actions against me; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.



Signature

9-25-06

Date

CHUN H PAE

Name (Printed or typed)
Authorized Representative of
Chun H. Pae dba Ace Cleaners, Park Pavillion Cleaners,
and Legacy Ranch Cleaners

owner

Title

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.

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