

EXECUTIVE SUMMARY - ENFORCEMENT MATTER
DOCKET NO.: 2006-0941-IHW-E **TCEQ ID:** RN100684034 **CASE NO.:** 30143
RESPONDENT NAME: Questech Services Corporation

ORDER TYPE:

<input checked="" type="checkbox"/> 1660 AGREED ORDER	<input type="checkbox"/> FINDINGS AGREED ORDER	<input type="checkbox"/> AMENDED ORDER	<input type="checkbox"/> IMMINENT 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 checked="" 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		

SITE WHERE VIOLATION(S) OCCURRED: Questech Services Corporation, 2201 Executive Drive, Garland, Dallas County

TYPE OF OPERATION: Facility that conducts ceramic substrate scribing and drilling, laser silicone machining, resistor trimming, ceramic substrate dicing and sawing, and laser making services for semiconductor components

SMALL BUSINESS: Yes No

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

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 February 26, 2007. No comments were received.

CONTACTS AND MAILING LIST:

TCEQ Attorney/SEP Coordinator: None

TCEQ Enforcement Coordinator: Mr. J. Craig Fleming, Enforcement Division, Enforcement Section II, MC 219, (512) 239-5806; Mr. Steven Lopez, Enforcement Division, MC 219, (512) 239-1896

TCEQ Field Investigator: Mr. Michael Hull, DFW Regional Office, MC R-04, (817) 588-5800

Respondent: Mr. Robert Wayne Chapman, President/Registered Agent, Questech Services Corporation, 2201 Executive Drive, Garland, Texas 75041

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 type="checkbox"/> Records Review</p> <p>Date of Complaint Relating to this Case: None</p> <p>Date of Investigation Relating to this Case: February 3, 2006</p> <p>Date of NOE Relating to this Case: March 22, 2006 (NOE)</p> <p>Background Facts: This investigation was conducted as a result of an expanded complaint investigation filed against another respondent, a company which had received waste shipments from Questech. Four violations were documented.</p> <p>WASTE</p> <p>1) Failed to properly label each container and tank with the words "Hazardous Waste" [30 TEX. ADMIN. CODE § 335.69(a)(3) and 40 CODE OF FEDERAL REGULATIONS § 262.34(a)(3)].</p> <p>2) Failed to conduct a hazardous waste determination at the time the waste was generated [30 TEX. ADMIN. CODE § 335.62 and 40 CODE OF FEDERAL REGULATIONS § 262.11(c)].</p> <p>3) Failed to update the Notice of Registration ("NOR") concerning the quantity of hazardous waste generated greater than the limits specified in 30 TEX. ADMIN. CODE § 335.78 in any calendar month [30 TEX. ADMIN. CODE § 335.6(c)].</p> <p>4) Failed to submit an exception report 45 days after waste was accepted by the initial transporter [30 TEX. ADMIN. CODE § 335.13(k)].</p>	<p>Total Assessed: \$18,189</p> <p>Total Deferred: \$3,637 <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: \$1,352 (remaining \$13,200 due in 11 monthly payments of \$1,200 each)</p> <p>Site Compliance History Classification: <input checked="" type="checkbox"/> High <input type="checkbox"/> Avg. <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification: <input checked="" 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>The Executive Director recognizes that Questech has implemented the following corrective measures at the Facility on or before July 31, 2006:</p> <p>a. Labels with the notation "Hazardous Waste" were placed on the unlabeled container that contained hazardous waste;</p> <p>b. Waste determinations have been completed on the isopropyl alcohol, acetone, and sand blasting waste streams;</p> <p>c. Completed updating of the NOR with the Texas Commission on Environmental Quality;</p> <p>d. Policy has been implemented to ensure the tracking of manifests;</p> <p>e. An exception report was submitted on July 31, 2006 for the seventeen manifests that were not returned to the facility within the forty-five day period; and</p> <p>f. Policies have been implemented to verify a facility is authorized to transport and dispose of their hazardous waste.</p>

Penalty Calculation Worksheet (PCW)

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



DATES	Assigned 05-Jul-2006	PCW 19-Oct-2006	Screening 10-Jul-2006	EPA Due	
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RESPONDENT/FACILITY INFORMATION	
Respondent Questech Services Corporation	
Reg. Ent. Ref. No. RN100684034	
Facility/Site Region 4-Dallas/Fort Worth	Major/Minor Source Minor Source

CASE INFORMATION	
Enf./Case ID No. 30143	No. of Violations 4
Docket No. 2006-0941-IHW-E	Order Type 1660
Media Program(s) Industrial and Hazardous Waste	Enf. Coordinator J. Craig Fleming
Multi-Media	EC's Team Enforcement Team 4
Admin. Penalty \$ Limit Minimum \$0	Maximum \$10,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	<i>Subtotal 1</i>	\$25,700
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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	-10% Enhancement	<i>Subtotals 2, 3, & 7</i>	-\$2,570
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Notes: The administrative penalty is reduced due to high performer classification.

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

Good Faith Effort to Comply	0% Reduction	<i>Subtotal 5</i>	\$0
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	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary	<input type="checkbox"/>	<input type="checkbox"/>
Ordinary	<input type="checkbox"/>	<input type="checkbox"/>
N/A	x	(mark with a small x)

Notes: No good faith is recommended because the waste has not been recovered.

Economic Benefit	0% Enhancement*	<i>Subtotal 6</i>	\$0
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Total EB Amounts	\$39	<small>*Capped at the Total EB \$ Amount</small>
Approx. Cost of Compliance	\$1,875	

SUM OF SUBTOTALS 1-7	<i>Final Subtotal</i>	\$23,130
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OTHER FACTORS AS JUSTICE MAY REQUIRE	21% Reduction	<i>Adjustment</i>	-\$4,941
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Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

Notes: A reduction in the administrative penalty so as to not let the paper work violation overly impact the administrative penalty.

Final Penalty Amount	\$18,189
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$18,189
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DEFERRAL	20% Reduction	<i>Adjustment</i>	-\$3,637
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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	\$14,552
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Screening Date	10-Jul-2006	Docket No.	2006-0941-IHW-E	PCW
Respondent	Questech Services Corporation			<i>Policy Revision 2 (September 2002)</i>
Case ID No.	30143			<i>PCW Revision May 19, 2005</i>
Reg. Ent. Reference No.	RN100684034			
Media [Statute]	Industrial and Hazardous Waste			
Enf. Coordinator	J. Craig Fleming			

Compliance History Worksheet

>> **Compliance History Site Enhancement (Subtotal 2)**

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOV's with same or similar violations as those in the current enforcement action (<i>number of NOV's meeting criteria</i>)	0	0%
	Other written NOV's	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)**

High Performer **Adjustment Percentage (Subtotal 7)** -10%

>> **Compliance History Summary**

Compliance History Notes The administrative penalty is reduced due to high performer classification.

Total Adjustment Percentage (Subtotals 2, 3, & 7) -10%

Screening Date	10-Jul-2006	Docket No.	2006-0941-IHW-E	PCW
Respondent	Questech Services Corporation		<i>Policy Revision 2 (September 2002)</i>	
Case ID No.	30143	<i>PCW Revision May 19, 2005</i>		
Reg. Ent. Reference No.	RN100684034			
Media [Statute]	Industrial and Hazardous Waste			
Enf. Coordinator	J. Craig Fleming			
Violation Number	1			
Primary Rule Cite(s)	30 Tex. Admin. Code § 335.69(a)(3)			
Secondary Rule Cite(s)	40 Code of Federal Regulations § 262.34(a)(3)			
Violation Description	Failure to properly label each container and tank with the words "Hazardous Waste". Specifically, one (1) fifty-five (55) gallon drum was not labeled with the words "Hazardous Waste", as documented during the investigation conducted on February 3, 2006.			
Base Penalty	\$10,000			

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

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

>> **Programmatic Matrix**

Falsification	Major	Moderate	Minor	Percent
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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

Adjustment -\$9,000

Base Penalty Subtotal \$1,000

Violation Events

Number of Violation Events

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

Violation Base Penalty \$1,000

One single event is recommended.

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount <input type="text" value="\$0"/>	Violation Final Penalty Total <input type="text" value="\$708"/>
This violation Final Assessed Penalty (adjusted for limits) <input type="text" value="\$708"/>	

Economic Benefit Worksheet

Respondent: Questech Services Corporation
 Case ID No: 30143
 Reg. Ent. Reference No: RN100684034
 Media [Statute]: Industrial and Hazardous Waste
 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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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)	\$25	03-Feb-2006	19-May-2006	0.3	\$0	n/a	\$0

Notes for DELAYED costs: The estimated expense for an employee to label the drum with the words "Hazardous Waste". The Date Required was the date of the investigation. The Final Date was the date of 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: NA

Approx. Cost of Compliance \$25

TOTAL \$0

Screening Date	10-Jul-2006	Docket No.	2006-0941-IHW-E	PCW
Respondent	Questech Services Corporation		Policy Revision 2 (September 2002)	
Case ID No.	30143	PCW Revision May 19, 2005		
Reg. Ent. Reference No.	RN100684034			
Media [Statute]	Industrial and Hazardous Waste			
Enf. Coordinator	J. Craig Fleming			
Violation Number	2			
Primary Rule Cite(s)	30 Tex. Admin. Code § 335.62			
Secondary Rule Cite(s)	40 Code of Federal Regulations § 262.11(c)			
Violation Description	Failure to conduct a hazardous waste determination at the time the waste was generated. Specifically, no hazardous waste determination was conducted on the isopropyl alcohol, acetone, and sand blasting waste streams, as documented during the investigation conducted on February 3, 2006.			

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" value="25%"/>
	Potential	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

>> **Programmatic Matrix**

		Falsification	Major	Moderate	Minor	
		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text"/>
Matrix Notes	Human health or the environment will or could be exposed to significant amounts of pollutants which would or could exceed levels protective of human health or environmental receptors.					

Adjustment

Base Penalty Subtotal

Violation Events

Number of Violation Events

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

Violation Base Penalty

Three single events are recommended (one for each waste stream).

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount <input type="text" value="\$7"/>	Violation Final Penalty Total <input type="text" value="\$5,308"/>
This violation Final Assessed Penalty (adjusted for limits) <input type="text" value="\$5,308"/>	

Economic Benefit Worksheet

Respondent Questech Services Corporation
 Case ID No. 30143
 Reg. Ent. Reference No. RN100684034
 Media [Statute] Industrial and Hazardous Waste
 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)	\$500	03-Feb-2006	19-May-2006	0.3	\$7	n/a	\$7

Notes for DELAYED costs: Estimated cost to conduct hazardous waste determinations on the three waste streams. The Date Required was the date of the investigation. The Final Date was the date of 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: NA

Approx. Cost of Compliance \$500

TOTAL \$7

Screening Date 10-Jul-2006 **Docket No.** 2006-0941-IHW-E **PCW**
Respondent Questech Services Corporation *Policy Revision 2 (September 2002)*
Case ID No. 30143 *PCW Revision May 19, 2005*
Reg. Ent. Reference No. RN100684034
Media [Statute] Industrial and Hazardous Waste
Enf. Coordinator J. Craig Fleming

Violation Number 3
Primary Rule Cite(s) 30 Tex. Admin. Code § 335.6(c)
Secondary Rule Cite(s)
Violation Description Failure to update the Notice of Registration (NOR) concerning the quantity of Hazardous Waste generated greater than the limits specified in 30 Tex. Admin. Code § 335.78 in any calendar month. Specifically, the respondent had not correctly characterized its waste (isopropyl alcohol and acetone waste streams) on the Notice of Registration and was managing the waste streams as universal waste, as documented during the investigation conducted on February 3, 2006.

Base Penalty \$10,000

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

		Harm			
Release		Major	Moderate	Minor	
OR	Actual				Percent
	Potential				

>> **Programmatic Matrix**

Falsification	Major	Moderate	Minor	
			X	Percent 1%

Matrix Notes The respondent complied with more than 70% of the rule requirement.

Adjustment -\$9,900

Base Penalty Subtotal \$100

Violation Events

Number of Violation Events 2

mark only one use a small x	daily	
	monthly	
	quarterly	
	semi-annual	
	annual	
	single event	X

Violation Base Penalty \$200

Two single events (one for each waste stream) are recommended.

Economic Benefit (EB) for this violation		Statutory Limit Test	
Estimated EB Amount	\$1	Violation Final Penalty Total	\$142
This violation Final Assessed Penalty (adjusted for limits)			\$142

Economic Benefit Worksheet

Respondent: Questech Services Corporation
 Case ID No. 30143
 Reg. Ent. Reference No. RN100684034
 Media [Statute] Industrial and Hazardous Waste
 Violation No. 3

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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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	\$100	02-Feb-2006	19-May-2006	0.3	\$1	n/a	\$1
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: Estimated cost to update the NOR for the Isopropyl alcohol and acetone waste streams. The Date Required was the date of the investigation. The Final Date was the date of 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: NA

Approx. Cost of Compliance \$100 **TOTAL** \$1

Screening Date	10-Jul-2006	Docket No.	2006-0941-IHW-E	PCW
Respondent	Questech Services Corporation		Policy Revision 2 (September 2002)	
Case ID No.	30143	PCW Revision May 19, 2005		
Reg. Ent. Reference No.	RN100684034			
Media [Statute]	Industrial and Hazardous Waste			
Enf. Coordinator	J. Craig Fleming			
Violation Number	4			
Primary Rule Cite(s)	30 Tex. Admin. Code § 335.13(k)			
Secondary Rule Cite(s)				
Violation Description	Failure to submit an exception report 45 days after waste was accepted by the initial transporter. Specifically, the respondent failed to submit exception reports for seventeen (17) original copies of manifests that had not been returned to the facility, as documented during the investigation conducted on February 3, 2006.			

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="text"/>	<input type="text"/>	Percent <input type="text" value="10%"/>

Matrix Notes

Adjustment

Base Penalty Subtotal

Violation Events

Number of Violation Events

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

Violation Base Penalty

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: Questech Services Corporation
 Case ID No: 30143
 Reg. Ent. Reference No: RN100684034
 Media [Statute]: Industrial and Hazardous Waste
 Violation No: 4

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	\$1,000	03-Feb-2006	31-Jul-2006	0.5	\$24	n/a	\$24
Training/Sampling	\$250	03-Feb-2006	31-Jul-2006	0.5	\$6	n/a	\$6
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: Estimated cost to establish a record keeping system and train employees to submit an exception report within 45 days. The Date Required was the date of the investigation. The Final Date was the date of 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: NA

Approx. Cost of Compliance \$1,250

TOTAL \$30

Compliance History

Customer/Respondent/Owner-Operator: CN600391007 Questech Services Corporation Classification: HIGH Rating: 0.00
Regulated Entity: RN100684034 QUESTECH SERVICES Classification: HIGH Site Rating: 0.00
ID Number(s): INDUSTRIAL AND HAZARDOUS WASTE GENERATION EPA ID TXR000013946
INDUSTRIAL AND HAZARDOUS WASTE GENERATION SOLID WASTE REGISTRATION # 84501 (SWR)
Location: 2201 EXECUTIVE DR, GARLAND, TX, 75041 Rating Date: September 01 05 Repeat Violator: NO
TCEQ Region: REGION 04 - DFW METROPLEX
Date Compliance History Prepared: July 06, 2006
Agency Decision Requiring Compliance History: Enforcement
Compliance Period: July 06, 2001 to July 06, 2006

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

Name: J. Craig Fleming Phone: 239-5806

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 06/30/2006 (453958)
N/A
2 08/25/2005 (405704)
- 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.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
QUESTECH SERVICES
CORPORATION
RN100684034

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§
§
§

BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

AGREED ORDER
DOCKET NO. 2006-0941-IHW-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 Questech Services Corporation ("Questech") under the authority of the TEX. HEALTH & SAFETY CODE ch. 361 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and Questech appear before the Commission and together stipulate that:

1. Questech owns and operates a facility that conducts ceramic substrate scribing and drilling, laser silicon machining, resistor trimming, ceramic substrate dicing and sawing, and laser making services for semiconductor components at 2201 Executive Drive in Garland, Dallas County, Texas (the "Facility").
2. The Facility involves or involved the management of industrial hazardous waste as defined in TEX. HEALTH & SAFETY CODE ch. 361.
3. The Commission and Questech agree that the Commission has jurisdiction to enter this Agreed Order, and that Questech is subject to the Commission's jurisdiction.
4. Questech received notice of the violations alleged in Section II ("Allegations") on or about March 27, 2006.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Questech of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of Eighteen Thousand One Hundred Eighty-Nine Dollars (\$18,189) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Questech has paid One Thousand Three Hundred Fifty-Two Dollars (\$1,352) of the administrative penalty and Three Thousand Six Hundred Thirty-Seven Dollars (\$3,637) is deferred

contingent upon Questech'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 Questech fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require Questech to pay all or part of the deferred penalty.

The remaining amount of Thirteen Thousand Two Hundred (\$13,200) of the administrative penalty shall be payable in 11 monthly payments of One Thousand Two Hundred Dollars (\$1,200) 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 Questech 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 Questech to meet the payment schedule of this Agreed Order constitutes the failure by Questech 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 Questech 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 Questech has implemented the following corrective measures at the Facility on or before July 31, 2006:
 - a. Labels with the notation "Hazardous Waste" were placed on the unlabeled container that contained hazardous waste;
 - b. Waste determinations have been completed on the isopropyl alcohol, acetone, and sand blasting waste streams;
 - c. Completed updating of the Notice of Registration ("NOR") with the Texas Commission on Environmental Quality;
 - d. Policy has been implemented to ensure the tracking of manifests;
 - e. An exception report was submitted on July 31, 2006 for the seventeen manifests that were not returned to the facility within the forty-five day period; and
 - f. Policies have been implemented to verify a facility is authorized to transport and dispose of their hazardous waste.
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 Questech has not complied with one or more of the terms or conditions in this Agreed Order.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that proper record-keeping is essential for transparency and accountability, particularly in the context of public administration and financial management.

2. The second part of the document outlines the various methods and tools used for data collection and analysis. It highlights the need for standardized procedures to ensure the reliability and validity of the information gathered. This includes the use of surveys, interviews, and statistical software to process and interpret the data.

3. The third part of the document focuses on the ethical considerations surrounding data collection and analysis. It stresses the importance of obtaining informed consent from participants and ensuring that their personal information is protected and used only for the intended purpose. Ethical guidelines and best practices are provided to guide researchers and practitioners in this area.

4. The fourth part of the document discusses the challenges and limitations of data collection and analysis. It acknowledges that there are often obstacles to obtaining complete and accurate data, such as non-response rates and measurement errors. It also notes that the interpretation of data can be subjective and influenced by the researcher's biases and assumptions.

5. The fifth part of the document provides a summary of the key findings and conclusions. It reiterates the importance of rigorous and ethical data collection and analysis practices, and offers recommendations for future research and practice. The document concludes by emphasizing the value of data in informing decision-making and improving organizational performance.

6. The sixth part of the document includes a list of references and sources used in the research. It provides a comprehensive overview of the literature on data collection and analysis, including books, journal articles, and online resources. This section is intended to provide readers with a starting point for further exploration of the topic.

7. The seventh part of the document contains a list of appendices and supplementary materials. These include detailed questionnaires, interview transcripts, and additional data sets. These materials are provided to allow readers to access the raw data and methods used in the study, thereby enhancing the transparency and replicability of the research.

8. The eighth part of the document is a concluding statement that summarizes the overall purpose and significance of the document. It expresses the hope that the information provided will be useful and informative to all who read it, and that it will contribute to the advancement of knowledge and practice in the field of data collection and analysis.

9. The ninth part of the document is a list of acknowledgments and thanks. It expresses gratitude to the individuals and organizations that provided support and assistance throughout the research process. This includes funding agencies, colleagues, and participants who made the study possible.

10. The tenth part of the document is a list of contact information for the author and other relevant parties. This includes email addresses, phone numbers, and website URLs. This information is provided to facilitate communication and collaboration with the author and other interested parties.

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 Facility, Questech is alleged to have:

1. Failed to properly label each container and tank with the words "Hazardous Waste", in violation of 30 TEX. ADMIN. CODE § 335.69(a)(3) and 40 CODE OF FEDERAL REGULATIONS § 262.34(a)(3), as documented during an investigation conducted on February 3, 2006.
2. Failed to conduct a hazardous waste determination at the time the waste was generated, in violation of 30 TEX. ADMIN. CODE § 335.62 and 40 CODE OF FEDERAL REGULATIONS § 262.11(c), as documented during an investigation conducted on February 3, 2006.
3. Failed to update the NOR concerning the quantity of hazardous waste generated greater than the limits specified in 30 TEX. ADMIN. CODE § 335.78 in any calendar month, in violation of 30 TEX. ADMIN. CODE § 335.6(c), as documented during an investigation conducted on February 3, 2006.
4. Failed to submit an exception report 45 days after waste was accepted by the initial transporter, in violation of 30 TEX. ADMIN. CODE § 335.13(k), as documented during an investigation conducted on February 3, 2006.

III. DENIALS

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

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Questech pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Questech'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: Questech Services Corporation, Docket No. 2006-0941-IHW-E" to:

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the success of any business and for the protection of the interests of all parties involved. The document also highlights the need for transparency and accountability in all financial dealings.

Financial Statement

The following table provides a summary of the financial performance of the company for the period ending 31st December 2023. The data is presented in both US Dollars and British Pounds Sterling, allowing for easy comparison and analysis. The figures are based on the company's internal records and are subject to audit.

The table shows a steady increase in revenue over the period, with a corresponding increase in expenses. The net profit has also shown a significant improvement, reflecting the company's efforts to optimize its operations and reduce costs. The financial statement is a key indicator of the company's overall health and performance.

The financial statement is prepared in accordance with the accounting standards applicable in the United States and the United Kingdom. It provides a clear and concise overview of the company's financial position and is intended to provide valuable insights to all stakeholders. The document is a confidential document and should be handled accordingly.

The financial statement is a key document for the company and is used to inform a wide range of decisions. It is a vital tool for management and is also used by investors, creditors, and other interested parties. The financial statement is a reflection of the company's performance and is a key indicator of its future prospects.

Conclusion

In conclusion, the financial statement provides a comprehensive overview of the company's financial performance for the period ending 31st December 2023. The data shows a strong and consistent performance, with a clear upward trend in revenue and profit. The company's financial health is sound and its future prospects are bright.

Appendix A: The Financial Statement

The financial statement is a detailed document that provides a breakdown of the company's financial performance. It includes a balance sheet, an income statement, and a cash flow statement. The financial statement is a key document for the company and is used to inform a wide range of decisions. It is a vital tool for management and is also used by investors, creditors, and other interested parties.

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. The provisions of this Agreed Order shall apply to and be binding upon Questech. Questech is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
3. If Questech 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, Questech's failure to comply is not a violation of this Agreed Order. Questech shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Questech shall notify the Executive Director within seven days after Questech becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
4. 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 Questech shall be made in writing to the Executive Director. Extensions are not effective until Questech receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
5. This Agreed Order, issued by the Commission, shall not be admissible against Questech 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.
6. 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.
7. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to Questech, or three days after the date on which the Commission mails notice of the Order to Questech, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

Questech Services Corporation
DOCKET NO. 2006-0941-IHW-E
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SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission


For the Executive Director

3/14/07
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

OCT 25, 2006
Date

ROBERT W. CHASMAN
Name (Printed or typed)
Authorized Representative of
Questech Services Corporation

PRESIDENT
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.

