

**EXECUTIVE SUMMARY - ENFORCEMENT MATTER**

**DOCKET NO.:** 2006-1557-DCL-E **TCEQ ID:** RN104103031, RN104103023 and RN104103007 **CASE NO.:** 31228

**RESPONDENT NAME:** SABAH Corporation, Inc. dba VIP Cleaners and dba Liberty Cleaners

**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<br>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:** VIP Cleaners, 429 West Southline Boulevard, Cleveland, Liberty County ("Facility 1"); Liberty Cleaners, 2333 North Main Street, Liberty County ("Facility 2"); and Liberty Cleaners, 1703 East Houston Street, Cleveland, Liberty County ("Facility 3")

**TYPE OF OPERATION:** Either a drycleaning facility or a drycleaning drop station

**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 February 26, 2007. No comments were received.

**CONTACTS AND MAILING LIST:**

**TCEQ Attorney/SEP Coordinator:** None

**TCEQ Enforcement Coordinator:** Mr. Harvey Wilson, Enforcement Division, Enforcement Section II, MC 219, (512) 239-0321; Mr. Steven Lopez, Enforcement Division, MC 219, (512) 239-1896

**TCEQ Field Investigator:** Mr. Floyd Riley, Beaumont Regional Office, MC R-10, (409) 898-3838

**Respondent:** Mr. Wali N. Ali, Vice President, SABAH Corporation, Inc. dba VIP Cleaners and dba Liberty Cleaners, 2333 North Main, Liberty, Texas 77575

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

**VIOLATION SUMMARY CHART:**

| VIOLATION INFORMATION   | PENALTY CONSIDERATIONS  | CORRECTIVE ACTIONS TAKEN/REQUIRED   |
|---|---|---|
| <p><b>Type of Investigation:</b> <input type="checkbox"/> Complaint <input checked="" type="checkbox"/> Routine<br/> <input type="checkbox"/> Enforcement Follow-up <input type="checkbox"/> Records Review</p> <p><b>Date of Complaint Relating to this Case:</b> None</p> <p><b>Dates of Investigations Relating to this Case:</b> May 23 and May 25, 2006</p> <p><b>Dates of NOEs Relating to this Case:</b> August 29 and August 30, 2006 (NOE)</p> <p><b>Background Facts:</b> These were routine investigations. Three violations were documented.</p> <p><b>WASTE</b></p> <p>1) Failed to complete and submit the required registration form to the TCEQ for Facility 1 [30 TEX. ADMIN. CODE § 337.10(a) and TEX. HEALTH &amp; SAFETY CODE § 374.102].</p> <p>2) Failed to complete and submit the required registration form to the TCEQ for Facility 2 [30 TEX. ADMIN. CODE § 337.10(a) and TEX. HEALTH &amp; SAFETY CODE § 374.102].</p> <p>3) Failed to complete and submit the required registration form to the TCEQ for Facility 3 [30 TEX. ADMIN. CODE § 337.10(a) and TEX. HEALTH &amp; SAFETY CODE § 374.102].</p> | <p><b>Total Assessed:</b> \$3,555</p> <p><b>Total Deferred:</b> \$711<br/> <input checked="" type="checkbox"/> Expedited Settlement<br/> <input type="checkbox"/> Financial Inability to Pay</p> <p><b>SEP Conditional Offset:</b> \$0</p> <p><b>Total Paid (Due) to General Revenue:</b> \$316 (remaining \$2,528 due in 8 monthly payments of \$316 each)</p> <p><b>Site Compliance History Classification:</b> <input type="checkbox"/> High <input type="checkbox"/> Avg. <input type="checkbox"/> Poor</p> <p><b>Person Compliance History Classification:</b> <input type="checkbox"/> High <input type="checkbox"/> Avg. <input type="checkbox"/> Poor</p> <p><b>Major Source:</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><b>Applicable Penalty Policy:</b> September 2002</p> | <p><b>Ordering Provisions:</b></p> <p>The Order will require the Respondent to:</p> <p>a. Within 15 days after the effective date of this Agreed Order, complete and submit the required dry cleaner and/or drop station registration forms for Facility 1, Facility 2, and Facility 3; and</p> <p>b. Within 30 days after the effective date of this Agreed Order, submit written certification of compliance with Ordering Provision a.</p> |



Policy Revision 2 (September 2002)

# Penalty Calculation Worksheet (PCW)

PCW Revision May 19, 2005

|              |          |             |           |             |         |  |
|--------------|----------|-------------|-----------|-------------|---------|--|
| <b>DATES</b> | Assigned | 05-Sep-2006 | Screening | 18-Sep-2006 | EPA Due |  |
|              | PCW      | 15-Sep-2006 |           |             |         |  |

|  |  |
|--|--|
| <b>RESPONDENT/FACILITY INFORMATION</b> |  |
| Respondent                             | SABAH Corporation, Inc. dba Liberty Cleaners |
| Reg. Ent. Ref. No.                     | RN104103023                                  |
| Facility/Site Region                   | 12-Houston                                   |
| Major/Minor Source                     | Minor Source                                 |

|                                 |                 |                   |                    |
|---------------------------------|-----------------|-------------------|--------------------|
| <b>CASE INFORMATION</b>         |                 |                   |                    |
| Enf./Case ID No.                | 31228           | No. of Violations | 1                  |
| Docket No.                      | 2006-1557-DCL-E | Order Type        | 1660               |
| Media Program(s)                | Drycleaner      | Enf. Coordinator  | Harvey Wilson      |
| Multi-Media                     |                 | EC's Team         | Enforcement Team 4 |
| Admin. Penalty \$ Limit Minimum | \$0             | Maximum           | \$50               |

## Penalty Calculation Section

|   |            |         |
|---|------------|---------|
| <b>TOTAL BASE PENALTY (Sum of violation base penalties)</b> | 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.

|                           |                |                     |     |
|---------------------------|----------------|---------------------|-----|
| <b>Compliance History</b> | 0% Enhancement | Subtotals 2, 3, & 7 | \$0 |
|---------------------------|----------------|---------------------|-----|

Notes: No enhancement is recommended.

|                    |    |                |            |     |
|--------------------|----|----------------|------------|-----|
| <b>Culpability</b> | No | 0% Enhancement | Subtotal 4 | \$0 |
|--------------------|----|----------------|------------|-----|

Notes: The respondent does not meet the culpability criteria.

|                                    |              |            |     |
|------------------------------------|--------------|------------|-----|
| <b>Good Faith Effort to Comply</b> | 0% Reduction | Subtotal 5 | \$0 |
|------------------------------------|--------------|------------|-----|

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

Notes: The respondent does not meet good faith criteria.

|                         |                 |            |     |
|-------------------------|-----------------|------------|-----|
| <b>Economic Benefit</b> | 0% Enhancement* | Subtotal 6 | \$0 |
|-------------------------|-----------------|------------|-----|

|                            |       |                                   |
|----------------------------|-------|-----------------------------------|
| Total EB Amounts           | \$18  | *Capped at the Total EB \$ Amount |
| Approx. Cost of Compliance | \$250 |                                   |

|                             |                |         |
|-----------------------------|----------------|---------|
| <b>SUM OF SUBTOTALS 1-7</b> | Final Subtotal | \$1,185 |
|-----------------------------|----------------|---------|

|   |            |     |
|---|------------|-----|
| <b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b> | 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 |
|----------------------|---------|

|                                   |                        |         |
|-----------------------------------|------------------------|---------|
| <b>STATUTORY LIMIT ADJUSTMENT</b> | Final Assessed Penalty | \$1,185 |
|-----------------------------------|------------------------|---------|

|                 |               |            |        |
|-----------------|---------------|------------|--------|
| <b>DEFERRAL</b> | 20% Reduction | Adjustment | -\$237 |
|-----------------|---------------|------------|--------|

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

Notes: Deferral offered for expedited settlement.

|                        |  |       |
|------------------------|--|-------|
| <b>PAYABLE PENALTY</b> |  | \$948 |
|------------------------|--|-------|

|                                |  |                           |                                    |            |
|--------------------------------|--|---------------------------|------------------------------------|------------|
| <b>Screening Date</b>          | 18-Sep-2006                                  | <b>Docket No.</b>         | 2006-1557-DCL-E                    | <b>PCW</b> |
| <b>Respondent</b>              | SABAH Corporation, Inc. dba Liberty Cleaners |                           | Policy Revision 2 (September 2002) |            |
| <b>Case ID No.</b>             | 31228  | PCW Revision May 19, 2005 |                                    |            |
| <b>Reg. Ent. Reference No.</b> | RN104103023                                  |                           |                                    |            |
| <b>Media [Statute]</b>         | Drycleaner                                   |                           |                                    |            |
| <b>Enf. Coordinator</b>        | Harvey Wilson                                |                           |                                    |            |

**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%      |
| <i>Please Enter Yes or No</i> |  |                   |         |
| 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%      |

**Adjustment Percentage (Subtotal 2) 0%**

>> **Repeat Violator (Subtotal 3)**

|                                 |  |
|---------------------------------|--|
| <input type="text" value="No"/> | <b>Adjustment Percentage (Subtotal 3) 0%</b> |
|---------------------------------|--|

>> **Compliance History Person Classification (Subtotal 7)**

|                                  |  |
|----------------------------------|--|
| <input type="text" value="N/A"/> | <b>Adjustment Percentage (Subtotal 7) 0%</b> |
|----------------------------------|--|

>> **Compliance History Summary**

|                                 |                                |
|---------------------------------|--------------------------------|
| <b>Compliance History Notes</b> | No enhancement is recommended. |
|---------------------------------|--------------------------------|

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

|                                |  |                   |                 |   |
|--------------------------------|--|-------------------|-----------------|---|
| <b>Screening Date</b>          | 18-Sep-2006  | <b>Docket No.</b> | 2006-1557-DCL-E | <b>PCW</b>                                |
| <b>Respondent</b>              | SABAH Corporation, Inc. dba Liberty Cleaners   |                   |                 | <i>Policy Revision 2 (September 2002)</i> |
| <b>Case ID No.</b>             | 31228  |                   |                 | <i>PCW Revision May 19, 2005</i>          |
| <b>Reg. Ent. Reference No.</b> | RN104103023  |                   |                 |   |
| <b>Media [Statute]</b>         | Drycleaner   |                   |                 |   |
| <b>Enf. Coordinator</b>        | Harvey Wilson  |                   |                 |   |
| <b>Violation Number</b>        | 1  |                   |                 |   |
| <b>Primary Rule Cite(s)</b>    | 30 Tex. Admin. Code § 337.10(a)  |                   |                 |   |
| <b>Secondary Rule Cite(s)</b>  | Tex. Health and Safety Code § 374.102  |                   |                 |   |
| <b>Violation Description</b>   | The respondent failed to complete and submit the required registration form to the TCEQ for a dry cleaning and/or drop station facility. |                   |                 |   |
|                                | <b>Base Penalty</b>  |                   |                 | \$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

|               |              |   |
|---------------|--------------|---|
|               | daily        | X |
|               | monthly      |   |
|               | quarterly    |   |
| mark only one | semiannual   |   |
| use a small x | 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: \$18

Violation Final Penalty Total: \$1,185

This violation Final Assessed Penalty (adjusted for limits): \$1,185

### Economic Benefit Worksheet

Respondent: SABAH Corporation, Inc. dba Liberty Cleaners  
 Case ID No. 31228  
 Reg. Ent. Reference No. RN104103023  
 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 |
|------------------|-----------|---------------|------------|-----|----------------|---------------|-----------|
|------------------|-----------|---------------|------------|-----|----------------|---------------|-----------|

| 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 | 30-Jan-2007 | 1.4 | \$18 | n/a | \$18 |
| 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 the completed registration form was due. The final date is the date the respondent is projected to come 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 \$250 **TOTAL** \$18

# Compliance History

Customer/Respondent/Owner-Operator: CN602540502 Sabah Corporation, Inc. Classification: Rating:  
Regulated Entity: RN104103023 LIBERTY CLEANERS Classification: Site Rating:  
ID Number(s): INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXR000075424  
GENERATION  
Location: 2333 N MAIN ST, LIBERTY, TX, 77575 Rating Date: 9/1/2006  
Repeat Violator: NO  
TCEQ Region: REGION 12 - HOUSTON  
Date Compliance History Prepared: September 06, 2006  
Agency Decision Requiring Compliance History: Enforcement  
Compliance Period: September 06, 2001 to September 06, 2006  
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History  
Name: Harvey Wilson Phone: 239-0321

## 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 08/31/2006 (486776)
  - 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

# Mathematical Induction

Let  $P(n)$  be a statement involving a natural number  $n$ . To prove that  $P(n)$  is true for all natural numbers  $n$ , we use the principle of mathematical induction. The process consists of three main steps:

- Base Case:** Prove that  $P(1)$  is true.
- Inductive Step:** Assume  $P(k)$  is true for some arbitrary natural number  $k$ . Then, prove that  $P(k+1)$  is also true.
- Conclusion:** By the principle of mathematical induction,  $P(n)$  is true for all natural numbers  $n$ .

Example: Prove that the sum of the first  $n$  natural numbers is  $\frac{n(n+1)}{2}$ .

Let  $P(n)$  be the statement: "The sum of the first  $n$  natural numbers is  $\frac{n(n+1)}{2}$ ".

**Base Case:** For  $n=1$ , the sum is  $1$ , and  $\frac{1(1+1)}{2} = \frac{1 \cdot 2}{2} = 1$ . Thus,  $P(1)$  is true.

**Inductive Step:** Assume  $P(k)$  is true, i.e.,  $1 + 2 + \dots + k = \frac{k(k+1)}{2}$ . We need to show that  $P(k+1)$  is true, i.e.,  $1 + 2 + \dots + k + (k+1) = \frac{(k+1)(k+2)}{2}$ .

Starting from the inductive hypothesis, we add  $(k+1)$  to both sides of the equation:

$$1 + 2 + \dots + k + (k+1) = \frac{k(k+1)}{2} + (k+1)$$
$$= \frac{k(k+1) + 2(k+1)}{2} = \frac{(k+1)(k+2)}{2}$$

Thus,  $P(k+1)$  is true. By the principle of mathematical induction,  $P(n)$  is true for all natural numbers  $n$ .

Another example: Prove that  $2^n > n$  for all natural numbers  $n$ .

Let  $P(n)$  be the statement: " $2^n > n$ ".

**Base Case:** For  $n=1$ ,  $2^1 = 2 > 1$ . Thus,  $P(1)$  is true.

**Inductive Step:** Assume  $P(k)$  is true, i.e.,  $2^k > k$ . We need to show that  $P(k+1)$  is true, i.e.,  $2^{k+1} > k+1$ .

Starting from the inductive hypothesis, we multiply both sides of the inequality by 2:

$$2 \cdot 2^k > 2 \cdot k$$
$$2^{k+1} > 2k$$

Since  $2k > k+1$  for all natural numbers  $k$  (because  $k > 1$ ), we have:

$$2^{k+1} > 2k > k+1$$

Thus,  $P(k+1)$  is true. By the principle of mathematical induction,  $P(n)$  is true for all natural numbers  $n$ .



Policy Revision 2 (September 2002)

# Penalty Calculation Worksheet (PCW)

PCW Revision May 19, 2005

|              |          |             |           |             |         |  |
|--------------|----------|-------------|-----------|-------------|---------|--|
| <b>DATES</b> | Assigned | 05-Sep-2006 | Screening | 18-Sep-2006 | EPA Due |  |
|              | PCW      | 15-Sep-2006 |           |             |         |  |

|  |  |
|--|--|
| <b>RESPONDENT/FACILITY INFORMATION</b> |  |
| Respondent                             | SABAH Corporation, Inc. dba Liberty Cleaners |
| Reg. Ent. Ref. No.                     | RN104103007                                  |
| Facility/Site Region                   | 12-Houston                                   |
| Major/Minor Source                     | Minor Source                                 |

|                                 |                 |                   |                    |
|---------------------------------|-----------------|-------------------|--------------------|
| <b>CASE INFORMATION</b>         |                 |                   |                    |
| Enf./Case ID No.                | 31228           | No. of Violations | 1                  |
| Docket No.                      | 2006-1557-DCL-E | Order Type        | 1660               |
| Media Program(s)                | Drycleaner      | Enf. Coordinator  | Harvey Wilson      |
| Multi-Media                     |                 | EC's Team         | Enforcement Team 4 |
| Admin. Penalty \$ Limit Minimum | \$0             | Maximum           | \$50               |

## Penalty Calculation Section

|   |            |         |
|---|------------|---------|
| <b>TOTAL BASE PENALTY (Sum of violation base penalties)</b> | 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.

|                           |                |                     |     |
|---------------------------|----------------|---------------------|-----|
| <b>Compliance History</b> | 0% Enhancement | Subtotals 2, 3, & 7 | \$0 |
|---------------------------|----------------|---------------------|-----|

Notes: No enhancement is recommended.

|                    |    |                |            |     |
|--------------------|----|----------------|------------|-----|
| <b>Culpability</b> | No | 0% Enhancement | Subtotal 4 | \$0 |
|--------------------|----|----------------|------------|-----|

Notes: The respondent does not meet the culpability criteria.

|                                    |              |            |     |
|------------------------------------|--------------|------------|-----|
| <b>Good Faith Effort to Comply</b> | 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 good faith criteria.

|                         |                 |            |     |
|-------------------------|-----------------|------------|-----|
| <b>Economic Benefit</b> | 0% Enhancement* | Subtotal 6 | \$0 |
|-------------------------|-----------------|------------|-----|

|                            |       |                                   |
|----------------------------|-------|-----------------------------------|
| Total EB Amounts           | \$18  | *Capped at the Total EB \$ Amount |
| Approx. Cost of Compliance | \$250 |                                   |

|                             |                |         |
|-----------------------------|----------------|---------|
| <b>SUM OF SUBTOTALS 1-7</b> | Final Subtotal | \$1,185 |
|-----------------------------|----------------|---------|

|   |            |     |
|---|------------|-----|
| <b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b> | 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 |
|----------------------|---------|

|                                   |                        |         |
|-----------------------------------|------------------------|---------|
| <b>STATUTORY LIMIT ADJUSTMENT</b> | Final Assessed Penalty | \$1,185 |
|-----------------------------------|------------------------|---------|

|                 |               |            |        |
|-----------------|---------------|------------|--------|
| <b>DEFERRAL</b> | 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.

|                        |       |
|------------------------|-------|
| <b>PAYABLE PENALTY</b> | \$948 |
|------------------------|-------|

|  |   |            |
|--|---|------------|
| <b>Screening Date</b> 18-Sep-2006                              | <b>Docket No.</b> 2006-1557-DCL-E         | <b>PCW</b> |
| <b>Respondent</b> SABAH Corporation, Inc. dba Liberty Cleaners | <i>Policy Revision 2 (September 2002)</i> |            |
| <b>Case ID No.</b> 31228                                       | <i>PCW Revision May 19, 2005</i>          |            |
| <b>Reg. Ent. Reference No.</b> RN104103007                     |   |            |
| <b>Media [Statute]</b> Drycleaner                              |   |            |
| <b>Enf. Coordinator</b> Harvey Wilson                          |   |            |

**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%      |
| <i>Please Enter Yes or No</i> |  |                   |         |
| 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%      |

**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**

No enhancement is recommended.

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

|                                |  |                     |                 |   |
|--------------------------------|--|---------------------|-----------------|---|
| <b>Screening Date</b>          | 18-Sep-2006  | <b>Docket No.</b>   | 2006-1557-DCL-E | <b>PCW</b>                                |
| <b>Respondent</b>              | SABAH Corporation, Inc. dba Liberty Cleaners   |                     |                 | <i>Policy Revision 2 (September 2002)</i> |
| <b>Case ID No.</b>             | 31228  |                     |                 | <i>PCW Revision May 19, 2005</i>          |
| <b>Reg. Ent. Reference No.</b> | RN104103007  |                     |                 |   |
| <b>Media [Statute]</b>         | Drycleaner   |                     |                 |   |
| <b>Enf. Coordinator</b>        | Harvey Wilson  |                     |                 |   |
| <b>Violation Number</b>        | 1  |                     |                 |   |
| <b>Primary Rule Cite(s)</b>    | 30 Tex. Admin. Code § 337.10(a)  |                     |                 |   |
| <b>Secondary Rule Cite(s)</b>  | Tex. Health and Safety Code § 374.102  |                     |                 |   |
| <b>Violation Description</b>   | The respondent failed to complete and submit the required registration form to the TCEQ for a dry cleaning and/or drop station facility. |                     |                 |   |
|                                |  | <b>Base Penalty</b> |                 | \$50                                      |

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

| Release   | Harm  |          |       | Percent |
|-----------|-------|----------|-------|---------|
|           | Major | Moderate | Minor |         |
| Actual    |       |          |       |         |
| Potential |       |          |       |         |

OR

>> **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<br>use a small x | daily        | X |
|                                | monthly      |   |
|                                | quarterly    |   |
|                                | semianual    |   |
|                                | 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.

|  |  |
|--|--|
| <b>Economic Benefit (EB) for this violation</b>                      | <b>Statutory Limit Test</b>            |
| Estimated EB Amount: \$18  | Violation Final Penalty Total: \$1,185 |
| This violation Final Assessed Penalty (adjusted for limits): \$1,185 |  |

### Economic Benefit Worksheet

Respondent: SABAH Corporation, Inc. dba Liberty Cleaners  
 Case ID No: 31228  
 Reg. Ent. Reference No: RN104103007  
 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 |
|------------------|-----------|---------------|------------|-----|----------------|---------------|-----------|
|------------------|-----------|---------------|------------|-----|----------------|---------------|-----------|

| 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 | 30-Jan-2007 | 1.4 | \$18 | n/a | \$18 |
| 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 the completed registration form was due. The final date is the date the respondent is projected to come 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 \$250

**TOTAL** \$18

# Compliance History

Customer/Respondent/Owner-Operator: CN602540502 Sabah Corporation, Inc. Classification: Rating:  
Regulated Entity: RN104103007 LIBERTY CLEANERS Classification: Site Rating:  
ID Number(s): INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXR000075440  
GENERATION  
Location: 1703 E HOUSTON ST, CLEVELAND, TX, 77327 Rating Date: September 01 06  
Repeat Violator: NO

TCEQ Region: REGION 12 - HOUSTON  
Date Compliance History Prepared: September 06, 2006  
Agency Decision Requiring Compliance History: Enforcement  
Compliance Period: September 06, 2001 to September 06, 2006

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

Name: Harvey Wilson Phone: 239-0321

## 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 08/31/2006 (486779)
  - 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

1998-1999

1. The first part of the report deals with the general situation of the country and the progress of the reform process. It also discusses the main achievements and the challenges ahead.

2. The second part of the report deals with the economic situation and the progress of the reform process.

2.1. The economic situation is generally stable and the growth rate is satisfactory. The inflation rate is low and the balance of payments is in surplus.

3. The third part of the report deals with the social situation and the progress of the reform process.

3.1. The social situation is generally stable and the living standards are improving. The unemployment rate is low and the social services are of a high quality.

4. The fourth part of the report deals with the political situation and the progress of the reform process.

4.1. The political situation is generally stable and the democratic process is progressing. The government is committed to the reform process and the rule of law.

5. The fifth part of the report deals with the environmental situation and the progress of the reform process.

5.1. The environmental situation is generally stable and the environmental protection measures are being implemented. The government is committed to sustainable development and the protection of the environment.

6. The sixth part of the report deals with the international situation and the progress of the reform process.

6.1. The international situation is generally stable and the country is maintaining good relations with its neighbors and the international community. The government is committed to international cooperation and the promotion of peace and stability.

7. The seventh part of the report deals with the conclusion and the progress of the reform process.

7.1. The conclusion is that the reform process is progressing well and the country is on a path towards a more prosperous and democratic future.

8. The eighth part of the report deals with the annexes and the progress of the reform process.

8.1. The annexes provide detailed information on the various aspects of the reform process and the current situation of the country.



Policy Revision 2 (September 2002)

# Penalty Calculation Worksheet (PCW)

PCW Revision May 19, 2005

|              |          |             |           |             |         |  |
|--------------|----------|-------------|-----------|-------------|---------|--|
| <b>DATES</b> | Assigned | 05-Sep-2006 | Screening | 18-Sep-2006 | EPA Due |  |
|              | PCW      | 15-Sep-2006 |           |             |         |  |

|  |  |
|--|--|
| <b>RESPONDENT/FACILITY INFORMATION</b> |  |
| Respondent                             | SABAH Corporation, Inc. dba VIP Cleaners |
| Reg. Ent. Ref. No.                     | RN104103031                              |
| Facility/Site Region                   | 12-Houston                               |
| Major/Minor Source                     | Minor Source                             |

|                                 |                 |                   |                    |
|---------------------------------|-----------------|-------------------|--------------------|
| <b>CASE INFORMATION</b>         |                 |                   |                    |
| Enf./Case ID No.                | 31228           | No. of Violations | 1                  |
| Docket No.                      | 2006-1557-DCL-E | Order Type        | 1660               |
| Media Program(s)                | Drycleaner      | Enf. Coordinator  | Harvey Wilson      |
| Multi-Media                     |                 | EC's Team         | Enforcement Team 4 |
| Admin. Penalty \$ Limit Minimum | \$0             | Maximum           | \$50               |

## Penalty Calculation Section

|   |            |         |
|---|------------|---------|
| <b>TOTAL BASE PENALTY (Sum of violation base penalties)</b> | 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.

|                           |                |                     |     |
|---------------------------|----------------|---------------------|-----|
| <b>Compliance History</b> | 0% Enhancement | Subtotals 2, 3, & 7 | \$0 |
|---------------------------|----------------|---------------------|-----|

Notes: No enhancement is recommended.

|                    |    |                |            |     |
|--------------------|----|----------------|------------|-----|
| <b>Culpability</b> | No | 0% Enhancement | Subtotal 4 | \$0 |
|--------------------|----|----------------|------------|-----|

Notes: The respondent does not meet the culpability criteria.

|                                    |              |            |     |
|------------------------------------|--------------|------------|-----|
| <b>Good Faith Effort to Comply</b> | 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 good faith criteria.

|                         |                 |            |     |
|-------------------------|-----------------|------------|-----|
| <b>Economic Benefit</b> | 0% Enhancement* | Subtotal 6 | \$0 |
|-------------------------|-----------------|------------|-----|

|                            |       |                                   |
|----------------------------|-------|-----------------------------------|
| Total EB Amounts           | \$18  | *Capped at the Total EB \$ Amount |
| Approx. Cost of Compliance | \$250 |                                   |

|                             |                |         |
|-----------------------------|----------------|---------|
| <b>SUM OF SUBTOTALS 1-7</b> | Final Subtotal | \$1,185 |
|-----------------------------|----------------|---------|

|   |            |     |
|---|------------|-----|
| <b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b> | Adjustment | \$0 |
|---|------------|-----|

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

Notes:

|                             |         |
|-----------------------------|---------|
| <b>Final Penalty Amount</b> | \$1,185 |
|-----------------------------|---------|

|                                   |                        |         |
|-----------------------------------|------------------------|---------|
| <b>STATUTORY LIMIT ADJUSTMENT</b> | Final Assessed Penalty | \$1,185 |
|-----------------------------------|------------------------|---------|

|                 |               |            |        |
|-----------------|---------------|------------|--------|
| <b>DEFERRAL</b> | 20% Reduction | Adjustment | -\$237 |
|-----------------|---------------|------------|--------|

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

Notes: Deferral offered for expedited settlement.

|                        |       |
|------------------------|-------|
| <b>PAYABLE PENALTY</b> | \$948 |
|------------------------|-------|

|                                |  |                           |                                    |            |
|--------------------------------|--|---------------------------|------------------------------------|------------|
| <b>Screening Date</b>          | 18-Sep-2006                              | <b>Docket No.</b>         | 2006-1557-DCL-E                    | <b>PCW</b> |
| <b>Respondent</b>              | SABAH Corporation, Inc. dba VIP Cleaners |                           | Policy Revision 2 (September 2002) |            |
| <b>Case ID No.</b>             | 31228                                    | PCW Revision May 19, 2005 |                                    |            |
| <b>Reg. Ent. Reference No.</b> | RN104103031                              |                           |                                    |            |
| <b>Media [Statute]</b>         | Drycleaner                               |                           |                                    |            |
| <b>Enf. Coordinator</b>        | Harvey Wilson                            |                           |                                    |            |

**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                         | 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)**

|                                 |  |
|---------------------------------|--|
| <input type="text" value="No"/> | <b>Adjustment Percentage (Subtotal 3) 0%</b> |
|---------------------------------|--|

>> **Compliance History Person Classification (Subtotal 7)**

|                                  |  |
|----------------------------------|--|
| <input type="text" value="N/A"/> | <b>Adjustment Percentage (Subtotal 7) 0%</b> |
|----------------------------------|--|

>> **Compliance History Summary**

|                                 |                                |
|---------------------------------|--------------------------------|
| <b>Compliance History Notes</b> | No enhancement is recommended. |
|---------------------------------|--------------------------------|

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

|                                |  |                   |                 |   |
|--------------------------------|--|-------------------|-----------------|---|
| <b>Screening Date</b>          | 18-Sep-2006  | <b>Docket No.</b> | 2006-1557-DCL-E | <b>PCW</b>                                |
| <b>Respondent</b>              | SABAH Corporation, Inc. dba VIP Cleaners   |                   |                 | <i>Policy Revision 2 (September 2002)</i> |
| <b>Case ID No.</b>             | 31228  |                   |                 | <i>PCW Revision May 19, 2005</i>          |
| <b>Reg. Ent. Reference No.</b> | RN104103031  |                   |                 |   |
| <b>Media [Statute]</b>         | Drycleaner   |                   |                 |   |
| <b>Enf. Coordinator</b>        | Harvey Wilson  |                   |                 |   |
| <b>Violation Number</b>        | 1  |                   |                 |   |
| <b>Primary Rule Cite(s)</b>    | 30 Tex. Admin. Code § 337.10(a)  |                   |                 |   |
| <b>Secondary Rule Cite(s)</b>  | Tex. Health and Safety Code § 374.102  |                   |                 |   |
| <b>Violation Description</b>   | The respondent failed to complete and submit the required registration form to the TCEQ for a dry cleaning and/or drop station facility. |                   |                 |   |
| <b>Base Penalty</b>            |  |                   |                 | \$50                                      |

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

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

>> **Programmatic Matrix**

|  |  |               |       |          |       |  |
|--|--|---------------|-------|----------|-------|--|
|  |  | Falsification | Major | Moderate | Minor |  |
|  |  |               | x     |          |       | Percent <input type="text" value="10%"/> |

Matrix Notes

Adjustment

**Base Penalty Subtotal**

**Violation Events**

Number of Violation Events

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

**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.

|   |  |
|---|--|
| <b>Economic Benefit (EB) for this violation</b>   | <b>Statutory Limit Test</b>  |
| Estimated EB Amount <input type="text" value="\$18"/>   | Violation Final Penalty Total <input type="text" value="\$1,185"/> |
| <b>This violation Final Assessed Penalty (adjusted for limits)</b> <input type="text" value="\$1,185"/> |  |

### Economic Benefit Worksheet

Respondent: SABAH Corporation, Inc. dba VIP Cleaners  
 Case ID No: 31228  
 Reg. Ent. Reference No: RN104103031  
 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 |
|------------------|-----------|---------------|------------|-----|----------------|---------------|-----------|
|------------------|-----------|---------------|------------|-----|----------------|---------------|-----------|

| 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 | 30-Jan-2007 | 1.4 | \$18 | n/a | \$18 |
| 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 the completed registration form was due. The final date is the date the respondent is projected to come 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: CN602540502 Sabah Corporation, Inc. Classification: Rating:  
Regulated Entity: RN104103031 VIP CLEANERS Classification: Site Rating:  
ID Number(s): INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXR000075689  
GENERATION  
Location: 429 W SOUTHLINE BOULEVARD Rating Date: September 01 06  
CLEVELAND, TX, 77327 Repeat Violator: NO  
TCEQ Region: REGION 12 - HOUSTON  
Date Compliance History Prepared: September 06, 2006  
Agency Decision Requiring Compliance History: Enforcement  
Compliance Period: September 06, 2001 to September 06, 2006

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

Name: Harvey Wilson Phone: 239-0321

## 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 (486790)
  - 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

# Wiederholungsfragen

- 1. Welche Aufgaben hat die Zelle? (10 Punkte)
  - Energieerzeugung
  - Stoffaustausch
  - Signalübertragung
  - Zellteilung
  - Abfallabgabe
  - Ionenhaushalt
  - pH-Wertregulation
  - Temperaturregulation
  - Wasserhaushalt
  - Osmotischer Druck
- 2. Welche Aufgaben hat das Zellkern? (10 Punkte)
  - Speicherung der Erbinformation
  - Regulation der Zellteilung
  - Produktion von Ribosomen
  - Produktion von Enzymen
  - Produktion von Hormonen
  - Produktion von Antikörpern
  - Produktion von Proteinen
  - Produktion von Lipiden
  - Produktion von Kohlenhydraten
  - Produktion von Nucleinsäuren
- 3. Welche Aufgaben hat das Mitochondrium? (10 Punkte)
  - Energieerzeugung
  - Stoffaustausch
  - Signalübertragung
  - Zellteilung
  - Abfallabgabe
  - Ionenhaushalt
  - pH-Wertregulation
  - Temperaturregulation
  - Wasserhaushalt
  - Osmotischer Druck
- 4. Welche Aufgaben hat das Golgi-Apparat? (10 Punkte)
  - Stoffaustausch
  - Signalübertragung
  - Zellteilung
  - Abfallabgabe
  - Ionenhaushalt
  - pH-Wertregulation
  - Temperaturregulation
  - Wasserhaushalt
  - Osmotischer Druck
  - Produktion von Proteinen
- 5. Welche Aufgaben hat das Lysosom? (10 Punkte)
  - Abfallabgabe
  - Ionenhaushalt
  - pH-Wertregulation
  - Temperaturregulation
  - Wasserhaushalt
  - Osmotischer Druck
  - Produktion von Enzymen
  - Produktion von Hormonen
  - Produktion von Antikörpern
  - Produktion von Proteinen
- 6. Welche Aufgaben hat das Peroxisom? (10 Punkte)
  - Abfallabgabe
  - Ionenhaushalt
  - pH-Wertregulation
  - Temperaturregulation
  - Wasserhaushalt
  - Osmotischer Druck
  - Produktion von Enzymen
  - Produktion von Hormonen
  - Produktion von Antikörpern
  - Produktion von Proteinen
- 7. Welche Aufgaben hat das Centriol? (10 Punkte)
  - Zellteilung
  - Abfallabgabe
  - Ionenhaushalt
  - pH-Wertregulation
  - Temperaturregulation
  - Wasserhaushalt
  - Osmotischer Druck
  - Produktion von Enzymen
  - Produktion von Hormonen
  - Produktion von Antikörpern
- 8. Welche Aufgaben hat das Plasmalemma? (10 Punkte)
  - Stoffaustausch
  - Signalübertragung
  - Zellteilung
  - Abfallabgabe
  - Ionenhaushalt
  - pH-Wertregulation
  - Temperaturregulation
  - Wasserhaushalt
  - Osmotischer Druck
  - Produktion von Proteinen
- 9. Welche Aufgaben hat das Tonoplast? (10 Punkte)
  - Stoffaustausch
  - Signalübertragung
  - Zellteilung
  - Abfallabgabe
  - Ionenhaushalt
  - pH-Wertregulation
  - Temperaturregulation
  - Wasserhaushalt
  - Osmotischer Druck
  - Produktion von Proteinen
- 10. Welche Aufgaben hat das Chloroplast? (10 Punkte)
  - Energieerzeugung
  - Stoffaustausch
  - Signalübertragung
  - Zellteilung
  - Abfallabgabe
  - Ionenhaushalt
  - pH-Wertregulation
  - Temperaturregulation
  - Wasserhaushalt
  - Osmotischer Druck

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN  
ENFORCEMENT ACTION  
CONCERNING  
SABAH CORPORATION, INC.  
DBA VIP CLEANERS AND  
DBA LIBERTY CLEANERS  
RN104103031, RN104103023,  
RN104103007

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BEFORE THE  
  
TEXAS COMMISSION ON  
  
ENVIRONMENTAL QUALITY

**AGREED ORDER**  
**DOCKET NO. 2006-1557-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 SABAH Corporation, Inc. dba VIP Cleaners, and dba Liberty Cleaners ("SABAH Corporation") under the authority of TEX. HEALTH & SAFETY CODE ch. 374 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and SABAH Corporation appear before the Commission and together stipulate that:

1. SABAH owns and operates either a drycleaning facility and/or drop station facility at the following locations (the "Facilities"):
  - a. VIP Cleaners, 429 West Southline Boulevard, Cleveland, Liberty County, Texas ("Facility 1").
  - b. Liberty Cleaners, 2333 North Main Street, Liberty, Liberty County, Texas ("Facility 2").
  - c. Liberty Cleaners, 1703 East Houston Street, Cleveland, Liberty County, Texas, ("Facility 3").
2. The TCEQ has general authority to regulate the Facilities pursuant to TEX. HEALTH & SAFETY CODE § 374.051.
3. The Commission and SABAH Corporation agree that the Commission has jurisdiction to enter this Agreed Order, and that SABAH Corporation is subject to the Commission's jurisdiction.
4. SABAH Corporation received notice of the violations alleged in Section II ("Allegations") on or about September 4, 2006 and September 5, 2006.



5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by SABAH Corporation 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"). SABAH Corporation has paid Three Hundred Sixteen Dollars (\$316) of the administrative penalty and Seven Hundred Eleven Dollars (\$711) is deferred contingent upon SABAH Corporation'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 SABAH Corporation fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require SABAH Corporation to pay all or part of the deferred penalty.

The remaining amount of Two Thousand Five Hundred Twenty-Eight Dollars (\$2,528) of the administrative penalty shall be payable in eight monthly payments of Three Hundred Sixteen Dollars (\$316) 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 SABAH Corporation 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 SABAH Corporation to meet the payment schedule of this Agreed Order constitutes the failure by SABAH Corporation 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 SABAH Corporation have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
9. 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 SABAH Corporation has not complied with one or more of the terms or conditions in this Agreed Order.
10. 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.
11. 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, SABAH Corporation is alleged to have:

1. Failed to complete and submit the required registration form to the TCEQ for Facility 1, in violation of 30 TEX. ADMIN. CODE § 337.10(a) and TEX. HEALTH & SAFETY CODE § 374.102, as documented during an investigation conducted on May 23, 2006.
2. Failed to complete and submit the required registration form to the TCEQ for Facility 2, in violation of 30 TEX. ADMIN. CODE § 337.10(a) and TEX. HEALTH & SAFETY CODE § 374.102, as documented during an investigation conducted on May 25, 2006.
3. Failed to complete and submit the required registration form to the TCEQ for Facility 3, in violation of 30 TEX. ADMIN. CODE § 337.10(a) and TEX. HEALTH & SAFETY CODE § 374.102, as documented during an investigation conducted on May 23, 2006.

## III. DENIALS

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

## IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that SABAH Corporation pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and SABAH Corporation'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: SABAH Corporation, Inc. dba VIP Cleaners and dba Liberty Cleaners, Docket No. 2006-1557-DCL-E" to:

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 SABAH Corporation shall undertake the following technical requirements:
  - a. Within 15 days after the effective date of this Agreed Order, complete and submit the required dry cleaner and/or drop station registration forms for Facility 1, Facility 2, and Facility 3, in accordance with 30 TEX. ADMIN. CODE ch. 337 to:

Dry Cleaning Registration Team  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

1. The first part of the document is a letter from the author to the editor of the journal. The letter discusses the author's motivation for writing the paper and the importance of the research. It also mentions the author's affiliation with the institution and the journal's name.

### 2. Introduction

The introduction provides a brief overview of the research topic and the objectives of the study. It highlights the significance of the research and the contribution it aims to make to the field. The author also mentions the structure of the paper and the organization of the sections.

The methodology section describes the research methods used in the study. It details the data collection process, the sample size, and the statistical techniques employed for data analysis. The author also discusses the limitations of the study and the potential sources of error.

The results section presents the findings of the study. It includes a detailed description of the data and the statistical analysis. The author discusses the implications of the results and compares them with the existing literature. The conclusion summarizes the main findings and provides a final statement on the research.

### 3. Discussion

The discussion section provides a detailed analysis of the results and their implications. It discusses the theoretical and practical significance of the findings and compares them with the existing literature. The author also discusses the limitations of the study and the potential sources of error.

### 4. Conclusion

The conclusion summarizes the main findings of the study and provides a final statement on the research. It highlights the significance of the research and the contribution it aims to make to the field. The author also mentions the structure of the paper and the organization of the sections.

The references section lists the sources used in the study. It includes a detailed list of the books, articles, and other materials consulted by the author. The references are organized alphabetically and provide a comprehensive list of the sources used in the research.

The appendix section contains additional information related to the study. It includes a detailed list of the data used in the study, the statistical analysis, and other relevant information. The appendix is organized into several sections and provides a comprehensive overview of the data and analysis.

Author's Name  
Institution  
Address  
City, State, Zip  
Country

- b. Within 30 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:

Manager, Waste Section  
Houston Regional Office  
Texas Commission on Environmental Quality  
5425 Polk Avenue, Suite H  
Houston, Texas 77023-1486

3. The provisions of this Agreed Order shall apply to and be binding upon SABAH Corporation. SABAH Corporation 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 SABAH Corporation 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, SABAH Corporation's failure to comply is not a violation of this Agreed Order. SABAH Corporation shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. SABAH Corporation shall notify the Executive Director within seven days after SABAH Corporation 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 SABAH Corporation shall be made in writing to the Executive Director. Extensions are not effective until SABAH Corporation receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.

THE UNIVERSITY OF CHICAGO  
DEPARTMENT OF CHEMISTRY

MEMORANDUM FOR THE RECORD  
DATE: 10/15/68

RE: [Illegible]

[Illegible text]

BY: [Illegible]

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]

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6. This Agreed Order, issued by the Commission, shall not be admissible against SABAH Corporation 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 SABAH Corporation, or three days after the date on which the Commission mails notice of the Order to SABAH Corporation, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

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**SIGNATURE PAGE**

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

\_\_\_\_\_  
For the Commission

\_\_\_\_\_  
For the Executive Director

\_\_\_\_\_  
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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name (Printed or typed)  
Authorized Representative of  
SABAH Corporation, Inc. dba VIP Cleaners  
and dba Liberty Cleaners

\_\_\_\_\_  
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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