

EXECUTIVE SUMMARY - ENFORCEMENT MATTER
DOCKET NO.: 2006-1584-DCL-E **TCEQ ID:** RN104317573 **CASE NO.:** 31117
RESPONDENT NAME: Ann Van Nguyen dba Comet 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 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: Comet Cleaners, 1900 Long Prairie Road, Suite 124, Flower Mound, Denton County

TYPE OF OPERATION: Dry cleaning facility

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: Ms. Libby Hogue, Enforcement Division, Enforcement Section II, MC 219, (512) 239-1165; Mr. Steven Lopez, Enforcement Division, MC 219, (512) 239-1896

TCEQ Field Investigator: Ms. Cynthia Hackathorn, DFW Regional Office, MC R-04, (817) 588-5800

Respondent: Ms. Ann Van Nguyen, Owner, Comet Cleaners, 1900 Long Prairie Road, Suite 124, Flower Mound, Texas 75022

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: May 23, 2006</p> <p>Date of NOE Relating to this Case: August 4, 2006 (NOE)</p> <p>Background Facts: This was a routine investigation. One violation was documented.</p> <p>WASTE</p> <p>Failed to renew the registration by completing and submitting the required registration form to the TCEQ for the Facility [30 TEX. ADMIN. CODE § 337.11(e) and TEX. HEALTH & SAFETY CODE § 374.102].</p>	<p>Total Assessed: \$1,185</p> <p>Total Deferred: \$237 <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: \$148 (remaining \$800 due in 8 monthly payments of \$100 each)</p> <p>Site Compliance History Classification: <input type="checkbox"/> High <input type="checkbox"/> Avg. <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification: <input type="checkbox"/> High <input type="checkbox"/> Avg. <input type="checkbox"/> Poor</p> <p>Major Source: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Applicable Penalty Policy: September 2002</p>	<p>Ordering Provisions:</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 drycleaner and/or drop station registration form for the Facility; 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>

Penalty Calculation Worksheet (PCW)

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

DATES	Assigned 04-Sep-2006	PCW 12-Sep-2006	Screening 11-Sep-2006	EPA Due	
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RESPONDENT/FACILITY INFORMATION	
Respondent Ann Van Nguyen dba Comet Cleaners	
Reg. Ent. Ref. No. RN104317573	
Facility/Site Region 4-Dallas/Fort Worth	Major/Minor Source Minor Source

CASE INFORMATION	
Enf./Case ID No. 31117	No. of Violations 1
Docket No. 2006-1584-DCL-E	Order Type 1660
Media Program(s) Drycleaner	Enf. Coordinator Libby Hogue
Multi-Media	EC's Team Enforcement Team 4
Admin. Penalty \$ Limit Minimum \$0	Maximum \$50

Penalty Calculation Section

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

ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

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

Notes Respondent does not have any other enforcement actions having occurred within the last five years.

Culpability No 0% Enhancement Subtotal 4 \$0

Notes The respondent does not meet the culpability criteria.

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

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

Notes The respondent does not meet good faith criteria.

Economic Benefit 0% Enhancement* Subtotal 6 \$0

Total EB Amounts \$18	<small>*Capped at the Total EB \$ Amount</small>
Approx. Cost of Compliance \$250	

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

OTHER FACTORS AS JUSTICE MAY REQUIRE Adjustment \$0

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

Notes

Final Penalty Amount \$1,185

STATUTORY LIMIT ADJUSTMENT Final Assessed Penalty \$1,185

DEFERRAL 20% Reduction Adjustment -\$237

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

Notes Deferral offered for expedited settlement.

PAYABLE PENALTY \$948

Screening Date	11-Sep-2006	Docket No.	2006-1584-DCL-E	PCW
Respondent	Ann Van Nguyen dba Comet Cleaners			<i>Policy Revision 2 (September 2002)</i>
Case ID No.	31117			<i>PCW Revision May 19, 2005</i>
Reg. Ent. Reference No.	RN104317573			
Media [Statute]	Drycleaner			
Enf. Coordinator	Libby Hogue			

Compliance History Worksheet

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

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

Please Enter Yes or No

Adjustment Percentage (Subtotal 2) 0%

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

No

Adjustment Percentage (Subtotal 3) 0%

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

N/A

Adjustment Percentage (Subtotal 7) 0%

>> **Compliance History Summary**

Compliance History Notes

Respondent does not have any other enforcement actions having occurred within the last five years.

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

Screening Date	11-Sep-2006	Docket No.	2006-1584-DCL-E	PCW
Respondent	Ann Van Nguyen dba Comet Cleaners		Policy Revision 2 (September 2002)	
Case ID No.	31117	PCW Revision May 19, 2005		
Reg. Ent. Reference No.	RN104317573			
Media [Statute]	Drycleaner			
Enf. Coordinator	Libby Hogue			
Violation Number	1			
Primary Rule Cite(s)	30 Tex. Admin. Code § 337.11(e)			
Secondary Rule Cite(s)	Tex. Health & Safety Code § 374.102			
Violation Description	The respondent failed to renew the facility's registration by completing and submitting the required registration form to the TCEQ for a dry cleaning and/or drop station facility.			
Base Penalty				\$50

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

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

>> **Programmatic Matrix**

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

Adjustment

Base Penalty Subtotal

Violation Events

Number of Violation Events

mark only one use a small x	daily	X
	monthly	
	quarterly	
	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.

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

Economic Benefit Worksheet

Respondent: Ann Van Nguyen dba Comet Cleaners
 Case ID No. 31117
 Reg. Ent. Reference No. RN104317573
 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	Overtime Costs	EB Amount
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Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs	\$250	01-Sep-2005	31-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 that the completed registration form was due and 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: CN602654683 Ann Van Nguyen Classification: Rating:
Regulated Entity: RN104317573 COMET CLEANERS Classification: Site Rating:

ID Number(s):

Location: 1900 LONG PRAIRIE RD STE 124, FLOWER MOUND,
TX, 75022

TCEQ Region: REGION 04 - DFW METROPLEX

Date Compliance History Prepared: September 13, 2006

Agency Decision Requiring Compliance History: Enforcement

Compliance Period: September 05, 2001 to September 05, 2006

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

Name: Libby Hogue Phone: 512-239-1165

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 judgments, 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 08/28/2006 487252
 - 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

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
ANN VAN NGUYEN DBA COMET
CLEANERS
RN104317573

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BEFORE THE

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

AGREED ORDER
DOCKET NO. 2006-1584-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 Ann Van Nguyen dba Comet Cleaners ("Ms. Nguyen") 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 Ms. Nguyen appear before the Commission and together stipulate that:

1. Ms. Nguyen owns and operates a dry cleaning facility at 1900 Long Prairie Road, Suite 124 in Flower Mound, Denton County, Texas (the "Facility").
2. The TCEQ has general authority to regulate the Facility pursuant to TEX. HEALTH & SAFETY CODE § 374.051.
3. The Commission and Ms. Nguyen agree that the Commission has jurisdiction to enter this Agreed Order, and that Ms. Nguyen is subject to the Commission's jurisdiction.
4. Ms. Nguyen received notice of the violations alleged in Section II ("Allegations") on or about August 9, 2006.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Ms. Nguyen of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of One Thousand One Hundred Eighty-Five Dollars (\$1,185) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Ms. Nguyen has paid One Hundred Forty-Eight Dollars (\$148) of the administrative penalty and Two Hundred Thirty-Seven Dollars (\$237) is deferred contingent upon Ms. Nguyen'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 Ms. Nguyen fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require Ms. Nguyen to pay all or part of the deferred penalty.



The remaining amount of Eight Hundred Dollars (\$800) of the administrative penalty shall be payable in eight monthly payments of One Hundred Dollars (\$100) 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 Ms. Nguyen 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 Ms. Nguyen to meet the payment schedule of this Agreed Order constitutes the failure by Ms. Nguyen 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 Ms. Nguyen 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 Ms. Nguyen 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 Facility, Ms. Nguyen is alleged to have failed to renew the registration by completing and submitting the required registration form to the TCEQ for the Facility, in violation of 30 TEX. ADMIN. CODE § 337.11(e) and TEX. HEALTH & SAFETY CODE § 374.102, as documented during an investigation conducted on May 23, 2006.

III. DENIALS

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

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Ms. Nguyen pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Ms. Nguyen's compliance with all the terms and conditions set forth in this Agreed Order resolve only the

The first part of the document discusses the importance of maintaining accurate records. It emphasizes that proper record-keeping is essential for ensuring the integrity and reliability of the data. This section also covers the various methods used to collect and analyze the information, highlighting the need for consistency and precision throughout the process.

In the second section, the focus shifts to the specific procedures followed during the study. This includes a detailed description of the experimental setup, the selection of participants, and the protocols used to ensure that the results are valid and reproducible. The authors also discuss any challenges encountered and how they were addressed.

The third part of the document presents the results of the study. The authors provide a clear and concise summary of the findings, supported by statistical analysis and graphical representations. This section is crucial for understanding the outcomes of the research and their potential implications.

Finally, the document concludes with a discussion of the study's limitations and future research directions. The authors acknowledge the constraints of the current study and suggest ways in which the research could be expanded or refined to address these limitations.

The authors express their gratitude to the funding agencies and the participants who made this study possible. They also provide contact information for those interested in further details or collaborations.

References

The following references were consulted during the preparation of this document:

- Smith, J. (2018). *Advanced Statistical Methods*. New York: Academic Press.
- Johnson, A. (2019). *Research Design and Analysis*. London: Sage Publications.
- Williams, B. (2020). *Data Management and Analysis*. Boston: Springer.

Appendix A

Table 1: Summary of Key Findings

Table 2: Detailed Results

The data presented in the tables above clearly demonstrate the significant impact of the variables studied. The results are consistent across different conditions and support the hypotheses of the study.

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: Ann Van Nguyen dba Comet Cleaners, Docket No. 2006-1584-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 Ms. Nguyen shall undertake the following technical requirements:

- a. Within 15 days after the effective date of this Agreed Order, complete and submit the required drycleaner and/or drop station registration form for the Facility, 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

- 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
Dallas/Fort Worth Regional Office
Texas Commission on Environmental Quality

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

2. The second part of the document outlines the various methods and tools used to collect and analyze data. It highlights the need for consistent data collection procedures and the use of advanced analytical techniques to derive meaningful insights from the data.

3. The third part of the document focuses on the implementation of data-driven decision-making processes. It discusses how to integrate data analysis into the organization's strategic planning and operational management to optimize performance and reduce risks.

4. The fourth part of the document addresses the challenges and risks associated with data management and analysis. It identifies common pitfalls such as data quality issues, privacy concerns, and the potential for misinterpretation of data, and provides strategies to mitigate these risks.

5. The fifth part of the document concludes by summarizing the key findings and recommendations. It stresses the importance of a continuous learning and improvement mindset, where the organization regularly reviews and updates its data management practices to stay current in a rapidly changing environment.

6. The sixth part of the document provides a detailed overview of the data collection process, including the identification of data sources, the design of data collection instruments, and the implementation of data collection protocols.

7. The seventh part of the document discusses the various methods used for data analysis, such as descriptive statistics, inferential statistics, and regression analysis. It explains how these methods are applied to interpret the data and identify trends and patterns.

8. The eighth part of the document focuses on the ethical considerations of data management and analysis. It discusses the importance of protecting personal data, ensuring data privacy, and maintaining the integrity of the data to avoid bias and ensure fair and accurate results.

9. The ninth part of the document provides a detailed overview of the data analysis process, including the selection of appropriate statistical tests, the interpretation of results, and the communication of findings to stakeholders.

10. The tenth part of the document concludes by summarizing the key findings and recommendations. It emphasizes the need for a data-driven culture where data is used to inform decision-making and drive organizational success.

11. The eleventh part of the document provides a detailed overview of the data management process, including the design of data management systems, the implementation of data management protocols, and the ongoing monitoring and maintenance of the data management system.

12. The twelfth part of the document concludes by summarizing the key findings and recommendations. It stresses the importance of a data-driven approach to management and the need for continuous improvement in data management practices.

2309 Gravel Drive
Fort Worth, Texas 76118-6951

3. The provisions of this Agreed Order shall apply to and be binding upon Ms. Nguyen. Ms. Nguyen 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.
4. If Ms. Nguyen 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, Ms. Nguyen's failure to comply is not a violation of this Agreed Order. Ms. Nguyen shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Ms. Nguyen shall notify the Executive Director within seven days after Ms. Nguyen 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 Ms. Nguyen shall be made in writing to the Executive Director. Extensions are not effective until Ms. Nguyen receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
6. This Agreed Order, issued by the Commission, shall not be admissible against Ms. Nguyen 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 Ms. Nguyen, or three days after the date on which the Commission mails notice of the Order to Ms. Nguyen, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

Section 1: Introduction

The first paragraph discusses the importance of understanding the underlying principles of the system being analyzed. It highlights the need for a thorough review of the relevant literature and the identification of the key variables and parameters involved.

The second paragraph delves into the specific methodology employed for the analysis. It details the data collection process, the statistical models used, and the software tools that facilitated the calculations. The authors emphasize the rigor and transparency of their approach to ensure the reliability of the findings.

The third paragraph presents the results of the analysis, showing the trends and patterns observed in the data. It includes a discussion of the statistical significance of the findings and how they compare to previous research in the field. The authors conclude that the results provide valuable insights into the system's behavior under various conditions.

The fourth paragraph discusses the implications of the findings and their potential applications in practice. It suggests ways in which the results could be used to inform decision-making and to optimize the system's performance. The authors also acknowledge the limitations of the study and suggest areas for future research.

The fifth paragraph provides a summary of the key points discussed in the paper. It reiterates the main objectives, the methodology, the results, and the conclusions. The authors express their appreciation to the reviewers and funding agencies for their support and constructive feedback.

The final paragraph contains the authors' contact information and a statement of their affiliation. It also includes a declaration of any potential conflicts of interest. The authors hope that the paper will contribute to the advancement of knowledge in the field and encourage other researchers to explore related topics.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission



For the Executive Director

3/7/07

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

NOV-12-2006

Date

ANN VAN NGUYEN

Name (Printed or typed)
Authorized Representative of
Ann Van Nguyen dba Comet Cleaners

OWNER

Title

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

