

## EXECUTIVE SUMMARY - ENFORCEMENT MATTER

Page 1 of 2

**DOCKET NO.:** 2006-1297-DCL-E **TCEQ ID:** RN100915339, RN105019178, and RN104996160 **CASE NO.:** 30791

**RESPONDENT NAME:** Husaini, Inc. dba Memorial Village Cleaners and dba Prince 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:** Memorial Village Cleaners, 9079 Katy Freeway ("Facility 1"); Prince Cleaners, 9063 Gaylord Street ("Facility 2"); and Prince Cleaners, 2772 West TC Jester Boulevard ("Facility 3"), Houston, Harris County

**TYPE OF OPERATION:** Dry cleaner drop stations

**SMALL BUSINESS:**  Yes  No

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

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

**COMMENTS RECEIVED:** The *Texas Register* comment period expired on January 29, 2007. No comments were received.

### CONTACTS AND MAILING LIST:

**TCEQ Attorney/SEP Coordinator:** None

**TCEQ Enforcement Coordinator:** Ms. Audra L. Ruble, Enforcement Division, Enforcement Section III, MCR-14, (361) 825-3126; Mr. Steven Lopez, Enforcement Division, MC 219, (512) 239-1896

**TCEQ Field Investigator:** Mr. Harry Heinlein, Houston Regional Office, MC R-12, (713) 767-3500

**Respondent:** Mr. Ali Momin, Owner, Memorial Village Cleaners and Prince Cleaners, 2772 West TC Jester Boulevard, Houston, Texas 77018

Mr. Zikar Momin, Manager, Memorial Village Cleaners and Prince Cleaners, 2772 West TC Jester Boulevard, Houston, Texas 77018

**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  <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 24 and 31, 2006</p> <p><b>Date of NOEs Relating to this Case:</b> August 11, 18 and 31, 2006 (NOEs)</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> \$3,201</p> <p><b>Total Deferred:</b> \$639  <input checked="" type="checkbox"/> Expedited Settlement  <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> \$262 (remaining \$2,300 due in 23 monthly payments of \$100 each)</p> <p><b>Site Compliance History Classification:</b> <input type="checkbox"/> High <input checked="" type="checkbox"/> Avg. <input type="checkbox"/> Poor</p> <p><b>Person Compliance History Classification:</b> <input type="checkbox"/> High <input checked="" 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>Corrective Actions Taken:</b></p> <p>The Executive Director recognizes that Husaini, Inc. submitted the completed dry cleaner registration form to the TCEQ for Facility 1 on August 22, for Facility 2 on September 12, and for Facility 3 on August 17, 2006, respectively.</p>



Policy Revision 2 (September 2002)

# Penalty Calculation Worksheet (PCW)

PCW Revision May 19, 2005

<b>DATES</b>	Assigned	21-Aug-2006
	PCW	10-Oct-2006
	Screening	21-Aug-2006
	EPA Due	

<b>RESPONDENT/FACILITY INFORMATION</b>	
Respondent	Husaini, Inc. dba Memorial Village Cleaners
Reg. Ent. Ref. No.	RN100915339
Facility/Site Region	12-Houston
Major/Minor Source	Minor Source

<b>CASE INFORMATION</b>			
Enf./Case ID No.	30791	No. of Violations	1
Docket No.	2006-1297-DCL-E	Order Type	1660
Media Program(s)	Drycleaner	Enf. Coordinator	Audra L. Ruble
Multi-Media		EC's Team	Enforcement Team 5
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$50

## Penalty Calculation Section

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

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

<b>Compliance History</b>	0% Enhancement	<b>Subtotals 2, 3, &amp; 7</b>	<b>\$0</b>
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Notes: No adjustments are recommended based on compliance history.

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

<b>Good Faith Effort to Comply</b>	10% Reduction	<b>Subtotal 5</b>	<b>-\$119</b>
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	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		X
N/A		(mark with a small x)

Notes: The respondent came into compliance on August 22, 2006 after the Notice of Enforcement was issued.

<b>Economic Benefit</b>	0% Enhancement*	<b>Subtotal 6</b>	<b>\$0</b>
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Total EB Amounts	\$12	*Capped at the Total EB \$ Amount
Approx. Cost of Compliance	\$250	

<b>SUM OF SUBTOTALS 1-7</b>	<b>Final Subtotal</b>	<b>\$1,067</b>
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<b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b>		<b>Adjustment</b>	<b>\$0</b>
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Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

Notes:

<b>Final Penalty Amount</b>	<b>\$1,067</b>
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<b>STATUTORY LIMIT ADJUSTMENT</b>	<b>Final Assessed Penalty</b>	<b>\$1,067</b>
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<b>DEFERRAL</b>	20% Reduction	<b>Adjustment</b>	<b>-\$213</b>
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Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes: Deferral offered for expedited settlement.

<b>PAYABLE PENALTY</b>	<b>\$854</b>
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<b>Screening Date</b>	21-Aug-2006	<b>Docket No.</b>	2006-1297-DCL-E	<b>PCW</b>
<b>Respondent</b>	Husaini, Inc. dba Memorial Village Cleaners		Policy Revision 2 (September 2002)	
<b>Case ID No.</b>	30791	PCW Revision May 19, 2005		
<b>Reg. Ent. Reference No.</b>	RN100915339			
<b>Media [Statute]</b>	Drycleaner			
<b>Enf. Coordinator</b>	Audra L. Ruble			

**Compliance History Worksheet**

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

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%
<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)**

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

**Adjustment Percentage (Subtotal 3)**

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

**Adjustment Percentage (Subtotal 7)**

>> **Compliance History Summary**

**Compliance History Notes**

No adjustments are recommended based on compliance history.

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

<b>Screening Date</b>	21-Aug-2006	<b>Docket No.</b>	2006-1297-DCL-E	<b>PCW</b>
<b>Respondent</b>	Husaini, Inc. dba Memorial Village Cleaners		<i>Policy Revision 2 (September 2002)</i>	
<b>Case ID No.</b>	30791	<i>PCW Revision May 19, 2005</i>		
<b>Reg. Ent. Reference No.</b>	RN100915339			
<b>Media [Statute]</b>	Drycleaner			
<b>Enf. Coordinator</b>	Audra L. Ruble			
<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 & 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	
Actual				<b>Percent</b> <input type="text"/>
Potential				

>> **Programmatic Matrix**

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

**Adjustment**

**Base Penalty Subtotal**

**Violation Events**

Number of Violation Events

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

**Violation Base Penalty**

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

<b>Economic Benefit (EB) for this violation</b>	<b>Statutory Limit Test</b>
Estimated EB Amount <input type="text" value="\$12"/>	Violation Final Penalty Total <input type="text" value="\$1,067"/>
<b>This violation Final Assessed Penalty (adjusted for limits)</b> <input type="text" value="\$1,067"/>	

### Economic Benefit Worksheet

Respondent: Husaini, Inc. dba Memorial Village Cleaners  
 Case ID No: 30791  
 Reg. Ent. Reference No: RN100915339  
 Media [Statute]: Drycleaner  
 Violation No: 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs	\$250	01-Sep-2005	22-Aug-2006	1.0	\$12	n/a	\$12
Other (as needed)				0.0	\$0	n/a	\$0

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance \$250

**TOTAL** \$12

## Compliance History

Customer/Respondent/Owner-Operator:	CN600588057 HUSAINI INC	Classification: AVERAGE	Rating: 2.25
Regulated Entity:	RN100915339 MEMORIAL VILLAGE CLEANERS	Classification: AVERAGE BY DEFAULT	Site Rating: 3.01
ID Number(s):	AIR NEW SOURCE PERMITS INDUSTRIAL AND HAZARDOUS WASTE GENERATION	ACCOUNT NUMBER EPA ID	HG6104H TXR000070482
Location:	9079 KATY FWY, HOUSTON, TX, 77024	Rating Date: 9/1/2006 Repeat Violator: NO	
TCEQ Region:	REGION 12 - HOUSTON		
Date Compliance History Prepared:	October 23, 2006		
Agency Decision Requiring Compliance History:	Enforcement		
Compliance Period:	September 01, 2001 to August 31, 2006		

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

Name: Audra Ruble Phone: 361-825-3126

### 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?   | <u>N/A</u> |
| 4. If Yes, who was/were the prior owner(s)?  | <u>N/A</u> |
| 5. When did the change(s) in ownership occur?  | <u>N/A</u> |

### Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.  
N/A
  - B. Any criminal convictions of the state of Texas and the federal government.  
N/A
  - C. Chronic excessive emissions events.  
N/A
  - D. The approval dates of investigations. (CCEDS Inv. Track. No.)  
1 08/18/2006 (487402)
  - 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







Policy Revision 2 (September 2002)

# Penalty Calculation Worksheet (PCW)

PCW Revision May 19, 2005

<b>DATES</b>	<b>Assigned</b>	05-Sep-2006	<b>Screening</b>	08-Sep-2006	<b>EPA Due</b>	
	<b>PCW</b>	29-Sep-2006				

<b>RESPONDENT/FACILITY INFORMATION</b>	
<b>Respondent</b>	Husaini, Inc. dba Prince Cleaners
<b>Reg. Ent. Ref. No.</b>	RN105019178
<b>Facility/Site Region</b>	12-Houston
<b>Major/Minor Source</b>	Minor Source

<b>CASE INFORMATION</b>			
<b>Enf./Case ID No.</b>	30791	<b>No. of Violations</b>	1
<b>Docket No.</b>	2006-1297-DCL-E	<b>Order Type</b>	1660
<b>Media Program(s)</b>	Drycleaner	<b>Enf. Coordinator</b>	Audra L. Ruble
<b>Multi-Media</b>		<b>EC's Team</b>	Enforcement Team 5
<b>Admin. Penalty \$ Limit Minimum</b>	\$0	<b>Maximum</b>	\$50

## Penalty Calculation Section

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

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

<b>Compliance History</b>	0% Enhancement	<b>Subtotals 2, 3, &amp; 7</b>	\$0
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**Notes** No adjustments are recommended based on compliance history.

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

<b>Good Faith Effort to Comply</b>	10% Reduction	<b>Subtotal 5</b>	-\$119
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	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		X
N/A		(mark with a small x)

**Notes** The respondent came into compliance on September 12, 2006 after the Notice of Enforcement was issued.

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

<b>SUM OF SUBTOTALS 1-7</b>	<b>Final Subtotal</b>	\$1,067
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<b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b>		<b>Adjustment</b>	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

**Notes**

<b>Final Penalty Amount</b>	\$1,067
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<b>STATUTORY LIMIT ADJUSTMENT</b>	<b>Final Assessed Penalty</b>	\$1,067
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<b>DEFERRAL</b>	20% Reduction	<b>Adjustment</b>	-\$213
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Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

**Notes** Deferral offered for expedited settlement.

<b>PAYABLE PENALTY</b>	\$854
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<b>Screening Date</b>	08-Sep-2006	<b>Docket No.</b>	2006-1297-DCL-E	<b>PCW</b>
<b>Respondent</b>	Husaini, Inc. dba Prince Cleaners			<i>Policy Revision 2 (September 2002)</i>
<b>Case ID No.</b>	30791			<i>PCW Revision May 19, 2005</i>
<b>Reg. Ent. Reference No.</b>	RN105019178			
<b>Media [Statute]</b>	Drycleaner			
<b>Enf. Coordinator</b>	Audra L. Ruble			

**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)**

<input type="text" value="No"/>	<b>Adjustment Percentage (Subtotal 3) 0%</b>
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>> **Compliance History Person Classification (Subtotal 7)**

<input type="text" value="Average Performer"/>	<b>Adjustment Percentage (Subtotal 7) 0%</b>
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>> **Compliance History Summary**

**Compliance History Notes** No adjustments are recommended based on compliance history.

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

<b>Screening Date</b>	08-Sep-2006	<b>Docket No.</b>	2006-1297-DCL-E	<b>PCW</b>
<b>Respondent</b>	Husaini, Inc. dba Prince Cleaners	<i>Policy Revision 2 (September 2002)</i>		
<b>Case ID No.</b>	30791	<i>PCW Revision May 19, 2005</i>		
<b>Reg. Ent. Reference No.</b>	RN105019178			
<b>Media [Statute]</b>	Drycleaner			
<b>Enf. Coordinator</b>	Audra L. Ruble			
<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 & 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	
Actual				Percent <input type="text"/>
Potential				

OR

>> **Programmatic Matrix**

<b>Falsification</b>				
	Major	Moderate	Minor	
	X			Percent <input type="text" value="10%"/>

Matrix Notes

**Adjustment**

**Base Penalty Subtotal**

**Violation Events**

Number of Violation Events

<i>mark only one use a small x</i>	daily	X
	monthly	
	quarterly	
	semiannual	
	annual	
	single event	

**Violation Base Penalty**

<b>Economic Benefit (EB) for this violation</b>	<b>Statutory Limit Test</b>
Estimated EB Amount <input type="text" value="\$13"/>	Violation Final Penalty Total <input type="text" value="\$1,067"/>
<b>This violation Final Assessed Penalty (adjusted for limits)</b> <input type="text" value="\$1,067"/>	

### Economic Benefit Worksheet

Respondent: Husalni, Inc. dba Prince Cleaners  
 Case ID No: 30791  
 Reg. Ent. Reference No: RN105019178  
 Media [Statute]: Drycleaner  
 Violation No: 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs	\$250	01-Sep-2005	12-Sep-2006	1.0	\$13	n/a	\$13
Other (as needed)				0.0	\$0	n/a	\$0

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance \$250

**TOTAL** \$13

# Compliance History

Customer/Respondent/Owner-Operator: CN600588057 HUSAINI INC Classification: AVERAGE Rating: 2.25  
Regulated Entity: RN105019178 PRINCE CLEANERS Classification: Site Rating:  
ID Number(s):  
Location: 9063 GAYLORD ST, HOUSTON, TX, 77024  
TCEQ Region: REGION 12 - HOUSTON  
Date Compliance History Prepared: October 17, 2006  
Agency Decision Requiring Compliance History: Enforcement  
Compliance Period: October 17, 2001 to October 17, 2006  
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History  
Name: Shontay Wilcher Phone: (512) 239-2136

## 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.)  
N/A
- 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

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Policy Revision 2 (September 2002)

# Penalty Calculation Worksheet (PCW)

PCW Revision May 19, 2005

<b>DATES</b>	Assigned	14-Aug-2006		
	PCW	17-Aug-2006	Screening	15-Aug-2006
			EPA Due	

<b>RESPONDENT/FACILITY INFORMATION</b>	
Respondent	Husaini, Inc. dba Prince Cleaners
Reg. Ent. Ref. No.	RN104996160
Facility/Site Region	12-Houston
Major/Minor Source	Minor Source

<b>CASE INFORMATION</b>			
Enf./Case ID No.	30791	No. of Violations	1
Docket No.	2006-1297-DCL-E	Order Type	1660
Media Program(s)	Drycleaner	Enf. Coordinator	Audra L. Ruble
Multi-Media		EC's Team	Enforcement Team 8
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$50

## Penalty Calculation Section

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

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

<b>Compliance History</b>	0% Enhancement	<b>Subtotal 2, 3, &amp; 7</b>	\$0
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Notes: No adjustments are recommended based on compliance history.

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

<b>Good Faith Effort to Comply</b>	10% Reduction	<b>Subtotal 5</b>	-\$119
------------------------------------	---------------	-------------------	--------

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

Notes: The respondent came into compliance on August 17, 2006 after the Notice of Enforcement was issued.

<b>Economic Benefit</b>	0% Enhancement*	<b>Subtotal 6</b>	\$0
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Total EB Amounts	\$12	*Capped at the Total EB \$ Amount
Approx. Cost of Compliance	\$250	

<b>SUM OF SUBTOTALS 1-7</b>	<b>Final Subtotal</b>	\$1,067
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<b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b>		<b>Adjustment</b>	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

Notes:

<b>Final Penalty Amount</b>	\$1,067
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<b>STATUTORY LIMIT ADJUSTMENT</b>	<b>Final Assessed Penalty</b>	\$1,067
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<b>DEFERRAL</b>	20% Reduction	<b>Adjustment</b>	-\$213
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Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes: Deferral offered for expedited settlement.

<b>PAYABLE PENALTY</b>	\$854
------------------------	-------

<b>Screening Date</b>	15-Aug-2006	<b>Docket No.</b>	2006-1297-DCL-E	<b>PCW</b>
<b>Respondent</b>	Husaini, Inc. dba Prince Cleaners			<i>Policy Revision 2 (September 2002)</i>
<b>Case ID No.</b>	30791			<i>PCW Revision May 19, 2005</i>
<b>Reg. Ent. Reference No.</b>	RN104996160			
<b>Media [Statute]</b>	Drycleaner			
<b>Enf. Coordinator</b>	Audra L. Ruble			

**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 (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 ( <i>number of audits for which notices were</i>	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )	0	0%
Other	<i>Please Enter Yes or No</i>		
	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

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

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

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

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

<input type="text" value="Average Performer"/>	<b>Adjustment Percentage (Subtotal 7) 0%</b>
--	--

>> **Compliance History Summary**

<b>Compliance History Notes</b>	No adjustments are recommended based on compliance history.
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**Total Adjustment Percentage (Subtotals 2, 3, & 7) 0%**



<b>Screening Date</b>	15-Aug-2006	<b>Docket No.</b>	2006-1297-DCL-E	<b>PCW</b>
<b>Respondent</b>	Husaini, Inc. dba Prince Cleaners		<i>Policy Revision 2 (September 2002)</i>	
<b>Case ID No.</b>	30791	<i>PCW Revision May 19, 2005</i>		
<b>Reg. Ent. Reference No.</b>	RN104996160			
<b>Media [Statute]</b>	Drycleaner			
<b>Enf. Coordinator</b>	Audra L. Ruble			
<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 & 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**

		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

**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**

<b>Economic Benefit (EB) for this violation</b>	<b>Statutory Limit Test</b>
<b>Estimated EB Amount</b> <input type="text" value="\$12"/>	<b>Violation Final Penalty Total</b> <input type="text" value="\$1,067"/>
<b>This violation Final Assessed Penalty (adjusted for limits)</b> <input type="text" value="\$1,067"/>	

### Economic Benefit Worksheet

Respondent: Husaini, Inc. dba Prince Cleaners  
 Case ID No.: 30791  
 Reg. Ent. Reference No.: RN104996160  
 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	One-time 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-2006	17-Aug-2006	1.0	\$12	n/a	\$12
Other (as needed)				0.0	\$0	n/a	\$0

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance \$250

**TOTAL** \$12

## Compliance History

Customer/Respondent/Owner-Operator:	CN600588057 HUSAINI INC	Classification: AVERAGE	Rating: 2.25
Regulated Entity:	RN104996160 PRINCE CLEANERS	Classification: AVERAGE BY DEFAULT	Site Rating: 3.01
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXR000073601
Location:	2772 W T C JESTER BLVD, HOUSTON, TX, 77018	Rating Date: September 01 06	Repeat Violator: NO
TCEQ Region:	REGION 12 - HOUSTON		
Date Compliance History Prepared:	October 23, 2006		
Agency Decision Requiring Compliance History:	Enforcement		
Compliance Period:	September 01, 2001 to August 31, 2006		

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

Name: Audra Ruble Phone: 361-825-3126

### 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?   | <u>N/A</u> |
| 4. If Yes, who was/were the prior owner(s)?  | <u>N/A</u> |
| 5. When did the change(s) in ownership occur?  | <u>N/A</u> |

#### 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 08/11/2006 (487170)
  - 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



<b>IN THE MATTER OF AN</b>	<b>§</b>	<b>BEFORE THE</b>
<b>ENFORCEMENT ACTION</b>	<b>§</b>	
<b>CONCERNING</b>	<b>§</b>	
<b>HUSAINI, INC. DBA MEMORIAL</b>	<b>§</b>	<b>TEXAS COMMISSION ON</b>
<b>VILLAGE CLEANERS AND DBA</b>	<b>§</b>	
<b>PRINCE CLEANERS</b>	<b>§</b>	
<b>RN100915339, RN105019178, AND</b>	<b>§</b>	
<b>RN104996160</b>	<b>§</b>	<b>ENVIRONMENTAL QUALITY</b>

## AGREED ORDER DOCKET NO. 2006-1297-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 Husaini, Inc. dba Memorial Village Cleaners and dba Prince Cleaners ("Husaini, Inc.") 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 Husaini, Inc. appear before the Commission and together stipulate that:

1. Husaini, Inc. owns and operates dry cleaner drop stations located at 9079 Katy Freeway (the "Facility 1"), 9063 Gaylord Street (the "Facility 2"), and 2772 West TC Jester Boulevard (the "Facility 3") in Houston, Harris County, Texas.
2. The TCEQ has general authority to regulate the Facilities pursuant to TEX. HEALTH & SAFETY CODE § 374.051.
3. The Commission and Husaini, Inc. agree that the Commission has jurisdiction to enter this Agreed Order, and that Husaini, Inc. is subject to the Commission's jurisdiction.
4. Husaini, Inc. received notice of the violations alleged in Section II ("Allegations") on or about August 16 and 23, 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 Husaini, Inc. of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of Three Thousand Two Hundred One Dollars (\$3,201) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Husaini, Inc. has paid Two Hundred Sixty-Two Dollars (\$262) of the administrative penalty and Six



Hundred Thirty-Nine Dollars (\$639) is deferred contingent upon Husaini, Inc.'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 Husaini, Inc. fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require Husaini, Inc. to pay all or part of the deferred penalty.

The remaining amount of Two Thousand Three Hundred Dollars (\$2,300) of the administrative penalty shall be payable in 23 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 Husaini, Inc. 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 Husaini, Inc. to meet the payment schedule of this Agreed Order constitutes the failure by Husaini, Inc. 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 Husaini, Inc. have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
9. The Executive Director recognizes that Husaini, Inc. submitted the completed dry cleaner registration form to the TCEQ for Facility 1 on August 22, for Facility 2 on September 12, and for Facility 3 on August 17, 2006, respectively.
10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that Husaini, Inc. has not complied with one or more of the terms or conditions in this Agreed Order.
11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

## II. ALLEGATIONS

1. As owner and operator of Facility 1, Husaini, Inc. is alleged to have failed to complete and submit the required registration form to the TCEQ for the Facility, 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 24, 2006.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that proper record-keeping is essential for transparency and accountability, particularly in financial matters. This section also touches upon the legal implications of failing to maintain such records, which can lead to severe consequences for individuals and organizations alike.

2. The second part of the document delves into the specific requirements for record-keeping, including the types of records that must be maintained and the frequency of updates. It provides a detailed overview of the various documents and data points that should be tracked, such as financial statements, contracts, and correspondence. This section is crucial for ensuring that all necessary information is captured and organized in a way that is easily accessible and verifiable.

3. The third part of the document focuses on the practical aspects of record-keeping, offering tips and best practices for efficient management. It discusses the importance of using clear and concise language in all records, as well as the need for regular audits and reviews to ensure the accuracy and integrity of the data. This section also addresses the challenges of record-keeping in a digital age, where electronic records are becoming increasingly prevalent.

4. The fourth part of the document explores the role of record-keeping in legal proceedings and dispute resolution. It highlights how well-maintained records can serve as powerful evidence in court, helping to establish the facts of a case and support a party's claims. This section also discusses the importance of preserving records for a sufficient period of time to ensure they are available when needed.

5. The fifth part of the document discusses the impact of record-keeping on organizational performance and decision-making. It explains how accurate records can provide valuable insights into trends and patterns, enabling leaders to make informed decisions and improve operational efficiency. This section also touches upon the importance of record-keeping in risk management and compliance with various regulations and standards.

6. The sixth part of the document addresses the challenges of record-keeping in a global context, where different legal systems and cultural practices may apply. It discusses the importance of understanding and adhering to local laws and regulations, as well as the need for cross-border collaboration and communication. This section also touches upon the importance of data security and privacy in a global environment.

7. The seventh part of the document discusses the future of record-keeping, including the impact of emerging technologies such as blockchain and artificial intelligence. It explores how these technologies can revolutionize the way records are created, stored, and accessed, offering new opportunities for efficiency and security. This section also touches upon the importance of staying up-to-date with the latest developments in the field.

8. The eighth part of the document provides a summary of the key points discussed throughout the document, emphasizing the overall importance of record-keeping in a wide range of contexts. It reiterates the need for accuracy, transparency, and accountability, and encourages individuals and organizations to take a proactive approach to record-keeping. This section also provides some final thoughts and recommendations for further reading and research.

9. The final part of the document is a conclusion that summarizes the main findings and offers a call to action. It emphasizes that record-keeping is not just a technical task, but a fundamental aspect of responsible and ethical behavior. It encourages readers to embrace the principles of good record-keeping and to apply them in their own lives and organizations. This section also provides some final thoughts and reflections on the importance of this practice in the modern world.



2. As owner and operator of Facility 2, Husaini, Inc. is alleged to have failed to complete and submit the required registration form to the TCEQ for the Facility, 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 24, 2006.
3. As owner and operator of Facility 3, Husaini, Inc. is alleged to have failed to complete and submit the required registration form to the TCEQ for the Facility, 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 31, 2006.

### III. DENIALS

Husaini, Inc. generally denies each allegation in Section II ("Allegations").

### IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Husaini, Inc. pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Husaini, Inc.'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: Husaini, Inc. dba Memorial Village Cleaners and dba Prince Cleaners, Docket No. 2006-1297-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. The provisions of this Agreed Order shall apply to and be binding upon Husaini, Inc. Husaini, Inc. is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
3. If Husaini, Inc. 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, Husaini, Inc.'s failure to comply is not a violation of this Agreed Order. Husaini, Inc. shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Husaini, Inc. shall notify the Executive Director within seven days after Husaini, Inc. becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
4. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by Husaini, Inc. shall be made in writing to the Executive Director. Extensions are not effective until Husaini, Inc. receives written approval from

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities.

2. It is essential to ensure that all data is entered correctly and consistently to avoid any discrepancies or errors.

3. Regular audits and reviews should be conducted to verify the accuracy and integrity of the information.

4. The use of standardized formats and procedures will help in maintaining uniformity across all records.

5. It is also important to ensure that all records are properly stored and protected from unauthorized access.

6. The following table provides a summary of the key points discussed in the document.

7. The table is organized into columns representing different aspects of the record-keeping process.

8. Each row represents a specific step or requirement, with corresponding details and instructions.

9. The table is designed to be easy to read and understand, providing a clear overview of the process.

10. The information presented in the table is intended to serve as a guide for all personnel involved in the process.

11. It is important to note that the table is not exhaustive and may be updated as needed.

12. The following table provides a summary of the key points discussed in the document.

13. The table is organized into columns representing different aspects of the record-keeping process.

14. Each row represents a specific step or requirement, with corresponding details and instructions.

15. The table is designed to be easy to read and understand, providing a clear overview of the process.

16. The information presented in the table is intended to serve as a guide for all personnel involved in the process.

17. It is important to note that the table is not exhaustive and may be updated as needed.

18. The following table provides a summary of the key points discussed in the document.

19. The table is organized into columns representing different aspects of the record-keeping process.

20. Each row represents a specific step or requirement, with corresponding details and instructions.

21. The table is designed to be easy to read and understand, providing a clear overview of the process.

22. The information presented in the table is intended to serve as a guide for all personnel involved in the process.

the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.

5. This Agreed Order, issued by the Commission, shall not be admissible against Husaini, Inc. in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
6. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
7. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to Husaini, Inc., or three days after the date on which the Commission mails notice of the Order to Husaini, Inc.



**SIGNATURE PAGE**

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

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

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

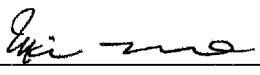
3/26/07  
\_\_\_\_\_  
Date

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

11-16-2006  
\_\_\_\_\_  
Date

Zikar Momin  
\_\_\_\_\_  
Name (Printed or typed)  
Authorized Representative of  
Husaini, Inc. dba Memorial Village Cleaners and dba Prince Cleaners

Manger  
\_\_\_\_\_  
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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