

**EXECUTIVE SUMMARY - ENFORCEMENT MATTER**  
**DOCKET NO.:** 2006-1660-MSW-E    **TCEQ ID:** RN102040813    **CASE NO.:** 30732  
**RESPONDENT NAME:** Milano Independent School District

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

**SITE WHERE VIOLATION(S) OCCURRED:** Milano Independent School District, 500 North 5th Street, Milano, Milam County

**TYPE OF OPERATION:** School

**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 March 19, 2007. No comments were received.

**CONTACTS AND MAILING LIST:**

**TCEQ Attorney/SEP Coordinator:** None

**TCEQ Enforcement Coordinator:** Ms. Dana Shuler, Enforcement Division, Enforcement Section IV, MC 128, (512) 239-2505; Mr. Steven Lopez, Enforcement Division, MC 219, (512) 239-1896

**TCEQ Field Investigator:** Mr. Russ Alexander, Waco Regional Office, MC R-09, (254) 751-0335

**Respondent:** Ms. Lindy Robinson, Superintendent, Milano Independent School District, 500 North 5th Street, Milano, Texas 76556

**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 30, 2006</p> <p>Date of NOE Relating to this Case: May 30, 2006 (NOE)</p> <p>Background Facts: This was a routine investigation. One violation was documented.</p> <p><b>WASTE</b></p> <p>Failed to properly dispose of municipal solid waste at an authorized facility. Specifically, the investigation documented the unauthorized dumping of approximately 300 cubic yards of municipal solid waste including wooden construction debris, concrete with rebar, old school chairs, a couch, an old shop vac, and other waste in a ravine behind Milano Middle School [30 TEX. ADMIN. CODE § 330.15(c) [formerly 30 TEX. ADMIN. CODE § 330.4(a)]].</p>	<p>Total Assessed: \$1,050</p> <p>Total Deferred: \$210  <input checked="" type="checkbox"/> Expedited Settlement  <input type="checkbox"/> Financial Inability to Pay</p> <p>SEP Conditional Offset: \$0</p> <p>Total Paid to General Revenue: \$840</p> <p>Site Compliance History Classification: <input type="checkbox"/> High <input checked="" type="checkbox"/> Avg. <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification: <input type="checkbox"/> High <input checked="" 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><b>Ordering Provisions:</b></p> <p>The Order will require the Respondent to:</p> <p>a. Immediately upon the effective date of this Agreed Order, cease disposing any additional waste at the Site;</p> <p>b. Within 120 days after the effective date of this Agreed Order, remove all waste materials buried on-site and dispose of the wastes at a permitted municipal solid waste disposal facility; and</p> <p>c. Within 135 days after the effective date of this Agreed Order, submit written certification and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provisions a. and b.</p>

**Penalty Calculation Worksheet (PCW)**

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

<b>DATES</b>	Assigned	31-Jul-2006	<b>Screening</b>	10-Aug-2006	<b>EPA Due</b>	
	PCW	21-Nov-2006				

<b>RESPONDENT/FACILITY INFORMATION</b>	
Respondent	Milano Independent School District
Reg. Ent. Ref. No.	RN102040813
Facility/Site Region	9-Waco
Major/Minor Source	Minor Source

<b>CASE INFORMATION</b>			
Enf./Case ID No.	30732	No. of Violations	1
Docket No.	2006-1660-MSW-E	Order Type	1660
Media Program(s)	Municipal Solid Waste	Enf. Coordinator	A. Sunday Udoetok
Multi-Media		EC's Team	Enforcement Team 8
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$10,000

### Penalty Calculation Section

**TOTAL BASE PENALTY (Sum of violation base penalties)** **Subtotal 1**

**ADJUSTMENTS (+/-) TO SUBTOTAL 1**

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

**Compliance History** 5% Enhancement **Subtotals 2, 3, & 7**

Notes

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

Notes

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

	Before NOV	NOV to EDRP/Settlement Offer
Extraordinary	<input type="text"/>	<input type="text"/>
Ordinary	<input type="text"/>	<input type="text"/>
N/A	X	(mark with a small x)

Notes

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

Total EB Amounts	\$258	*Capped at the Total EB \$ Amount
Approx. Cost of Compliance	\$5,400	

**SUM OF SUBTOTALS 1-7** **Final Subtotal**

**OTHER FACTORS AS JUSTICE MAY REQUIRE** **Adjustment**

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

Notes

**Final Penalty Amount**

**STATUTORY LIMIT ADJUSTMENT** **Final Assessed Penalty**

**DEFERRAL** 20% Reduction **Adjustment**

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

Notes

**PAYABLE PENALTY**

<b>Screening Date</b>	10-Aug-2006	<b>Docket No.</b>	2006-1660-MSW-E	<b>PCW</b>
<b>Respondent</b>	Milano Independent School District	Policy Revision 2 (September 2002)		
<b>Case ID No.</b>	30732	PCW Revision May 19, 2005		
<b>Reg. Ent. Reference No.</b>	RN102040813			
<b>Media [Statute]</b>	Municipal Solid Waste			
<b>Enf. Coordinator</b>	A. Sunday Udoetok			

**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)	1	5%
	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)** 5%

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

No Adjustment Percentage (Subtotal 3) 0%

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

Average Performer Adjustment Percentage (Subtotal 7) 0%

>> **Compliance History Summary**

**Compliance History Notes** An enhancement is given for one Notice of Violation for same or similar violations.

**Total Adjustment Percentage (Subtotals 2, 3, & 7)** 5%

<b>Screening Date</b>	10-Aug-2006	<b>Docket No.</b>	2006-1660-MSW-E	<b>PCW</b>
<b>Respondent</b>	Milano Independent School District	<i>Policy Revision 2 (September 2002)</i>		
<b>Case ID No.</b>	30732	<i>PCW Revision May 19, 2005</i>		
<b>Reg. Ent. Reference No.</b>	RN102040813			
<b>Media [Statute]</b>	Municipal Solid Waste			
<b>Enf. Coordinator</b>	A. Sunday Udoetok			
<b>Violation Number</b>	1			
<b>Primary Rule Cite(s)</b>	30 Tex. Admin. Code § 330.15(c) [formerly 30 Tex. Admin. Code § 330.4(a)]			
<b>Secondary Rule Cite(s)</b>				
<b>Violation Description</b>	Failure to properly dispose of municipal solid waste at an authorized facility, as documented during an investigation conducted on May 30, 2006. Specifically, the investigation documented the unauthorized dumping of approximately 300 cubic yards of municipal solid waste including wooden construction debris, concrete with rebar, old school chairs, a couch, an old shop vac, and other waste in a ravine behind Milano Middle School.			
<b>Base Penalty</b>				\$10,000

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

<b>Harm</b>			
<b>Release</b>	Major	Moderate	Minor
Actual			X
Potential			
			<b>Percent</b> 10%

OR

>> **Programmatic Matrix**

<b>Falsification</b>	Major	Moderate	Minor
			<b>Percent</b>

**Matrix Notes**

Human health or the environment has been exposed to insignificant amount of pollutants which do not exceed levels that are protective to human health or the environment.

**Adjustment** -\$9,000

**Base Penalty Subtotal** \$1,000

**Violation Events**

Number of Violation Events

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

**Violation Base Penalty** \$1,000

One quarterly event is recommended based on the May 30, 2006 investigation to the August 10, 2006 screening date.

<b>Economic Benefit (EB) for this violation</b>	<b>Statutory Limit Test</b>
<b>Estimated EB Amount</b> \$258	<b>Violation Final Penalty Total</b> \$1,050
<b>This violation Final Assessed Penalty (adjusted for limits)</b> \$1,050	

### Economic Benefit Worksheet

Respondent: Milano Independent School District  
 Case ID No: 30732  
 Reg. Ent. Reference No: RN102040813  
 Media [Statute]: Municipal Solid Waste  
 Violation No: 1

<b>Percent Interest</b>	<b>Years of Depreciation</b>
5.0	15

Item Description	Item Cost <small>No commas or \$</small>	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	\$5,400	30-May-2006	14-May-2007	1.0	\$258	n/a	\$258
Other (as needed)				0.0	\$0	n/a	\$0

**Notes for DELAYED costs**  
 Estimated cost to remove the unauthorized municipal solid waste and dispose it at an approved landfill (\$13 per cubic yard). Date Required is the investigation date and Final Date is the estimated date of compliance. Additionally, the cost includes \$1,500 for the use of equipment and personnel to load and haul the waste to a permitted municipal solid waste landfill.

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 \$5,400

**TOTAL** \$258

# Compliance History

Customer/Respondent/Owner-Operator:	CN601108863 Milano ISD	Classification: AVERAGE	Rating: 1.00
Regulated Entity:	RN102040813 MILANO ISD	Classification: AVERAGE	Site Rating: 1.00
ID Number(s):			
Location:	500 N 5TH ST, MILANO, TX, 76556	Rating Date: 9/1/2006 Repeat Violator: NO	
TCEQ Region:	REGION 09 - WACO		
Date Compliance History Prepared:	October 03, 2006		
Agency Decision Requiring Compliance History:	Enforcement		
Compliance Period:	October 03, 2001 to October 03, 2006		

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

Name: A. Sunday Udoetok Phone: (512) 239 2292

### Site Compliance History Components

- |  |     |
|--|-----|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | No  |
| 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.)  

N/A	1	01/25/2006	(453103)
	2	07/24/2006	(480560)
  - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)  

Date:	12/15/2005	(440153)	
Self Report?	NO		Classification: Moderate
Citation:	30 TAC Chapter 330, SubChapter A 330.4(a)		
Description:	An investigation conducted on December 6, 2005 documented unauthorized dumping of municipal solid waste in a ravine behind Milano Middle School.		
  - 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

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

2. It is essential to ensure that all data is entered correctly and consistently across all systems.

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

4. The second section outlines the specific procedures for handling sensitive information.

5. All personnel must be trained on these procedures and understand their responsibilities.

6. It is also important to establish clear communication channels for reporting any issues.

7. The final part of the document provides a summary of the key points and next steps.

8. Please refer to the attached documents for more detailed information on each topic.

9. Your cooperation and attention to these matters are greatly appreciated.

10. Thank you for your time and effort in reviewing this document.

11. If you have any questions or need further clarification, please do not hesitate to contact me.

12. We look forward to your feedback and continued collaboration.

13. Best regards,

14. [Signature]

15. [Title]

16. [Contact Information]

17. [Additional Information]

18. [Closing Remarks]



# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN  
ENFORCEMENT ACTION  
CONCERNING  
MILANO INDEPENDENT SCHOOL  
DISTRICT  
RN102040813**

§  
§  
§  
§  
§  
§

**BEFORE THE  
TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY**

## **AGREED ORDER DOCKET NO. 2006-1660-MSW-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 Milano Independent School District ("Milano ISD") under the authority of the TEX. HEALTH & SAFETY CODE ch. 361 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and Milano ISD appear before the Commission and together stipulate that:

1. Milano ISD owns the Milano Middle School and surrounding property located at 500 North 5th Street in Milano, Milam County, Texas (the "Site").
2. The Site involves or involved the management of municipal solid waste as defined in TEX. HEALTH & SAFETY CODE ch. 361.
3. The Commission and Milano ISD agree that the Commission has jurisdiction to enter this Agreed Order, and that Milano ISD is subject to the Commission's jurisdiction.
4. Milano ISD received notice of the violations alleged in Section II ("Allegations") on or about June 5, 2006.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Milano ISD of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of One Thousand Fifty Dollars (\$1,050) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Milano ISD has paid Eight Hundred Forty Dollars (\$840) of the administrative penalty and Two Hundred Ten Dollars (\$210) is deferred contingent upon Milano ISD'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 Milano ISD fails to timely and satisfactorily comply with all



requirements of this Agreed Order, the Executive Director may require Milano ISD to pay all or part of the deferred penalty.

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 Milano ISD 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 Milano ISD 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 Site, Milano ISD is alleged to have failed to properly dispose of municipal solid waste at an authorized facility, in violation of 30 TEX. ADMIN. CODE § 330.15(c) [formerly 30 TEX. ADMIN. CODE § 330.4(a)], as documented during an investigation conducted on May 30, 2006. Specifically, the investigation documented the unauthorized dumping of approximately 300 cubic yards of municipal solid waste including wooden construction debris, concrete with rebar, old school chairs, a couch, an old shop vac, and other waste in a ravine behind Milano Middle School.

## III. DENIALS

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

## IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Milano ISD pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Milano ISD'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

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes the need for transparency and accountability in financial reporting.

2. The second part of the document outlines the various methods and techniques used to collect and analyze data. It highlights the importance of using reliable sources and ensuring the accuracy of the information gathered.

3. The third part of the document focuses on the interpretation and analysis of the collected data. It discusses the various statistical tools and techniques used to identify trends and patterns in the data.

4. The fourth part of the document discusses the importance of communication and reporting. It emphasizes the need for clear and concise communication of the findings and conclusions of the study.

5. The fifth part of the document discusses the importance of ethical considerations in research. It highlights the need for researchers to adhere to ethical standards and to be transparent about any potential conflicts of interest.

### CONCLUSION

In conclusion, the document emphasizes the importance of maintaining accurate records, using reliable data collection methods, and communicating findings clearly. It also highlights the need for ethical considerations in research. The document provides a comprehensive overview of the research process and the various steps involved in conducting a study.

### REFERENCES

1. Smith, J. (2018). The importance of accurate records in financial reporting. *Journal of Accounting and Finance*, 15(2), 123-135.

2. Johnson, A. (2019). Data collection methods: A comparison of surveys and interviews. *Research Methods in Business*, 10(1), 45-58.

3. Brown, C. (2020). The importance of communication in research: A case study. *Journal of Business Communication*, 22(3), 210-225.

4. Davis, E. (2021). Ethical considerations in research: A review of the literature. *Ethics and Information Technology*, 13(1), 15-28.

payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Milano Independent School District, Docket No. 2006-1660-MSW-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 Milano ISD shall undertake the following technical requirements:
  - a. Immediately upon the effective date of this Agreed Order, cease disposing any additional waste at the Site;
  - b. Within 120 days after the effective date of this Agreed Order, remove all waste materials buried on-site and dispose of the wastes at a permitted municipal solid waste disposal facility; and
  - c. Within 135 days after the effective date of this Agreed Order, submit written certification as described below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a. and 2.b.

The certification shall 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:

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 ensuring transparency and accountability in the organization's operations.

The second part of the document outlines the specific procedures and protocols that must be followed to ensure the integrity and security of the data. It details the steps for data collection, storage, and retrieval, as well as the measures in place to protect against unauthorized access and data loss.

The third part of the document addresses the challenges and risks associated with data management. It identifies common pitfalls such as data redundancy, inconsistency, and security vulnerabilities, and provides strategies to mitigate these risks.

The fourth part of the document discusses the role of technology in data management. It highlights the benefits of using modern data management systems and provides recommendations for selecting and implementing the most appropriate technology for the organization's needs.

The fifth part of the document focuses on the importance of data quality and accuracy. It discusses the various factors that can affect data quality, such as data entry errors, incomplete information, and outdated data, and provides methods for monitoring and improving data quality.

The sixth part of the document discusses the legal and ethical considerations surrounding data management. It covers topics such as data privacy, data protection, and the responsible use of data, and provides guidance on how to ensure compliance with relevant laws and regulations.

The seventh part of the document discusses the importance of data backup and recovery. It outlines the best practices for creating and maintaining backups, and provides information on how to restore data in the event of a disaster or data loss.

The eighth part of the document discusses the role of data in decision-making and business performance. It explains how data can be used to identify trends, analyze performance, and make informed decisions that drive the organization's success. It also provides examples of how data has been used to improve business operations and customer satisfaction.

The ninth part of the document discusses the future of data management. It explores emerging trends and technologies, such as big data, cloud computing, and artificial intelligence, and discusses how these developments will impact the way data is managed and used in the future.

The tenth part of the document discusses the importance of data literacy and training. It emphasizes that all employees should have a basic understanding of data management and be able to use data effectively in their work.

The final part of the document provides a summary of the key points discussed throughout the document. It reiterates the importance of data management and provides a call to action for the organization to take steps to improve its data management practices.

Waste Section Manager  
Waco Regional Office  
Texas Commission on Environmental Quality  
6801 Sanger Avenue., Suite 2500  
Waco, Texas 76710-7826

3. The provisions of this Agreed Order shall apply to and be binding upon Milano ISD. Milano ISD is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Site operations referenced in this Agreed Order.
4. If Milano ISD 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, Milano ISD's failure to comply is not a violation of this Agreed Order. Milano ISD shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Milano ISD shall notify the Executive Director within seven days after Milano ISD 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 Milano ISD shall be made in writing to the Executive Director. Extensions are not effective until Milano ISD 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 Milano ISD 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 Milano ISD, or three days after the date on which the Commission mails notice of the Order to Milano ISD, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

10/10/2017 10:10:10 AM  
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**SIGNATURE PAGE**

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

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

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

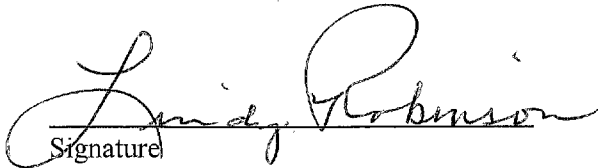
3/27/07  
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Date

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

12-19-2006  
\_\_\_\_\_  
Date

Lindy Robinson  
\_\_\_\_\_  
Name (Printed or typed)  
Authorized Representative of  
Milano Independent School District

Superintendent  
\_\_\_\_\_  
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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