

**EXECUTIVE SUMMARY - ENFORCEMENT MATTER**  
**DOCKET NO.:** 2006-1463-DCL-E    **TCEQ ID:** RN105010383    **CASE NO.:** 31016  
**RESPONDENT NAME:** Yong Baek O. dba 2 EZ 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:** 2 EZ Cleaners, 3504 East Rancier Avenue, Killen, Bell County

**TYPE OF OPERATION:** Dry cleaning drop station

**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 January 22, 2007. No comments were received.

**CONTACTS AND MAILING LIST:**

**TCEQ Attorney/SEP Coordinator:** None

**TCEQ Enforcement Coordinator:** Mr. Rajesh Acharya, Enforcement Division, Enforcement Section IV, MC128, (512) 239-0577; Mr. Steven Lopez, Enforcement Division, Enforcement Section I, MC 219, (512) 239-1896

**TCEQ Field Investigator:** Mr. Jeff Kunze, Waco Regional Office, MC R-09, (254) 761-3049

**Respondent:** Mr. Yong Baek, Owner, 2 EZ Cleaners, 3504 East Rancier Avenue, Killen, Texas 76543

**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 Complaints Relating to this Case:</b> None</p> <p><b>Date of Investigation Relating to this Case:</b> May 25, 2006</p> <p><b>Date of NOE Relating to this Case:</b> August 15, 2006 (NOE)</p> <p><b>Background Facts:</b> This was a routine scheduled investigation for compliance with the dry cleaner program. One significant program violation was observed.</p> <p><b>WASTE</b></p> <p>Failure to complete and submit the required registration form to the TCEQ for the facility [30 TEX. ADMIN. CODE § 337.10(a) and TEX. HEALTH &amp; SAFETY CODE § 374.102].</p>	<p><b>Total Assessed:</b> \$1,185</p> <p><b>Total Deferred:</b> \$237  <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> \$192 (remaining \$756 due in 4 monthly payments of \$189 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>Ordering Provisions</b></p> <p>The Order will require the Respondent to:</p> <p>a) Within 15 days after the effective date of this Agreed Order, complete and submit the required 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>



Policy Revision 2 (September 2002)

# Penalty Calculation Worksheet (PCW)

PCW Revision May 19, 2005

<b>DATES</b>	Assigned	28-Aug-2006		
	PCW	31-Jan-2007	Screening	29-Aug-2006
			EPA Due	

<b>RESPONDENT/FACILITY INFORMATION</b>	
Respondent	Yong Baek O. dba 2 EZ Cleaners
Reg. Ent. Ref. No.	RN105010383
Facility/Site Region	9- Waco
Major/Minor Source	Minor Source

<b>CASE INFORMATION</b>			
Enf./Case ID No.	31016	No. of Violations	1
Docket No.	2006-1463-DCL-E	Order Type	1660
Media Program(s)	Drycleaner	Enf. Coordinator	Rajesh Acharya
Multi-Media		EC's Team	Enforcement Team 7
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: No adjustment due to compliance history.

**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 the good faith criteria.

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

Total EB Amounts	\$18	*Capped at the Total EB \$ Amount
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

<b>Screening Date</b>	29-Aug-2006	<b>Docket No.</b>	2006-1463-DCL-E	<b>PCW</b>
<b>Respondent</b>	Yong Baek O. dba 2 EZ Cleaners		Policy Revision 2 (September 2002)	
<b>Case ID No.</b>	31016	PCW Revision May 19, 2005		
<b>Reg. Ent. Reference No.</b>	RN105010383			
<b>Media [Statute]</b>	Drycleaner			
<b>Enf. Coordinator</b>	Rajesh Acharya			

**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%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

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

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

No	<b>Adjustment Percentage (Subtotal 3)</b> 0%
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>> **Compliance History Person Classification (Subtotal 7)**

Average	<b>Adjustment Percentage (Subtotal 7)</b> 0%
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>> **Compliance History Summary**

<b>Compliance History Notes</b>	No adjustment due to compliance history.
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**Total Adjustment Percentage (Subtotals 2, 3, & 7)** 0%

<b>Screening Date</b>	29-Aug-2006	<b>Docket No.</b>	2006-1463-DCL-E	<b>PCW</b>
<b>Respondent</b>	Yong Baek O. dba 2 EZ Cleaners			<i>Policy Revision 2 (September 2002)</i>
<b>Case ID No.</b>	31016			<i>PCW Revision May 19, 2005</i>
<b>Reg. Ent. Reference No.</b>	RN105010383			
<b>Media [Statute]</b>	Drycleaner			
<b>Enf. Coordinator</b>	Rajesh Acharya			
<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**

		Major	Moderate	Minor	
	Falsification	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**

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**

**Violation Final Penalty Total**

**This violation Final Assessed Penalty (adjusted for limits)**

### Economic Benefit Worksheet

Respondent: Yong Baek O. dba 2 EZ Cleaners  
 Case ID No: 31016  
 Reg. Ent. Reference No: RN105010383  
 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	30-Jan-2007	1.4	\$18	n/a	\$18
Other (as needed)				0.0	\$0	n/a	\$0

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance **\$250**

**TOTAL \$18**

# Compliance History

Customer/Respondent/Owner-Operator: CN603072653 YONG BAEK O. Classification: AVERAGE BY Rating: 3.01  
DEFAULT

Regulated Entity: RN105010383 2 EZ CLEANERS Classification: AVERAGE BY Site Rating: 3.01  
DEFAULT

ID Number(s):

Location: 3504 E RANCIER AVE, KILLEEN, TX, 76543 Rating Date: September 01 06 Repeat Violator: NO

TCEQ Region: REGION 09 - WACO

Date Compliance History Prepared: January 31, 2007

Agency Decision Requiring Compliance History: Enforcement

Compliance Period: January 31, 2002 to January 31, 2007

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

Name: Rajesh Acharya Phone: (512) 239-0577

## Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? No
3. If Yes, who is the current owner? N/A
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

## Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.  
N/A
  - B. Any criminal convictions of the state of Texas and the federal government.  
N/A
  - C. Chronic excessive emissions events.  
N/A
  - D. The approval dates of investigations. (CCEDS Inv. Track. No.)  
1 08/24/2006 (485084)
  - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
  - 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

# PROCESSES OF THE MIND

THE MIND IS A MIGHTY FORCE

WHICH CAN MOVE MOUNTAINS

AND CHANGE THE COURSE

OF RIVERS

AND THE HEART OF MAN

IS THE CENTER OF THE UNIVERSE

AND THE SOURCE OF ALL KNOWLEDGE

AND THE WELL-SPRING OF ALL VIRTUE

AND THE FOUNTAIN OF ALL LIFE

AND THE CENTER OF ALL ACTION

AND THE SOURCE OF ALL POWER

AND THE WELL-SPRING OF ALL HAPPINESS

AND THE FOUNTAIN OF ALL LOVE

AND THE CENTER OF ALL FAITH

AND THE SOURCE OF ALL HOPE

AND THE WELL-SPRING OF ALL CHARITY

AND THE FOUNTAIN OF ALL GRACE

AND THE CENTER OF ALL MERCY

AND THE SOURCE OF ALL KINDNESS

AND THE WELL-SPRING OF ALL PATIENCE

AND THE FOUNTAIN OF ALL GENTLENESS

AND THE CENTER OF ALL MEekNESS

AND THE SOURCE OF ALL SELF-CONTROL

AND THE WELL-SPRING OF ALL TEMPERANCE

AND THE FOUNTAIN OF ALL SOBERNESS

AND THE CENTER OF ALL ORDER

AND THE SOURCE OF ALL CLEANLINESS

AND THE WELL-SPRING OF ALL DECENCY

AND THE FOUNTAIN OF ALL MODERATION

AND THE CENTER OF ALL BALANCE

AND THE SOURCE OF ALL HARMONY

AND THE WELL-SPRING OF ALL PEACE

AND THE FOUNTAIN OF ALL JOY

AND THE CENTER OF ALL CONTENTMENT

AND THE SOURCE OF ALL GRATITUDE

AND THE WELL-SPRING OF ALL HUMILITY

AND THE FOUNTAIN OF ALL SINCERITY

AND THE CENTER OF ALL INTEGRITY

AND THE SOURCE OF ALL COURAGE

AND THE WELL-SPRING OF ALL BRAVERY

AND THE FOUNTAIN OF ALL COURTESY

AND THE CENTER OF ALL RESPECT

AND THE SOURCE OF ALL POLITENESS

AND THE WELL-SPRING OF ALL KINDNESS

AND THE FOUNTAIN OF ALL GENTLENESS

AND THE CENTER OF ALL MEekNESS

AND THE SOURCE OF ALL SELF-CONTROL

AND THE WELL-SPRING OF ALL TEMPERANCE

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AND THE SOURCE OF ALL SELF-CONTROL

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN  
ENFORCEMENT ACTION  
CONCERNING  
YONG BAEK O. DBA 2 EZ  
CLEANERS  
RN105010383

§  
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§  
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BEFORE THE  
  
TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY

AGREED ORDER  
DOCKET NO. 2006-1463-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 Yong Baek O. dba 2 EZ Cleaners ("Mr. Baek") 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 Mr. Baek appear before the Commission and together stipulate that:

1. Mr. Baek owns and operates a dry cleaning drop station at 3504 East Rancier Avenue in Killeen, Bell 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 Mr. Baek agree that the Commission has jurisdiction to enter this Agreed Order, and that Mr. Baek is subject to the Commission's jurisdiction.
4. Mr. Baek received notice of the violations alleged in Section II ("Allegations") on or about August 20, 2006.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Mr. Baek 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"). Mr. Baek has paid One Hundred Ninety-Two Dollars (\$192) of the administrative penalty and Two Hundred Thirty-Seven Dollars (\$237) is deferred contingent upon Mr. Baek'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 Mr. Baek fails to timely and



satisfactorily comply with all requirements of this Agreed Order, including the payment schedule, the Executive Director may require Mr. Baek to pay all or part of the deferred penalty.

The remaining amount of Seven Hundred Fifty-Six Dollars (\$756) of the administrative penalty shall be payable in four monthly payments of One Hundred Eighty-Nine Dollars (\$189) 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 Mr. Baek 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 Mr. Baek to meet the payment schedule of this Agreed Order constitutes the failure by Mr. Baek 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 Mr. Baek 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 Mr. Baek 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, Mr. Baek 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 25, 2006.

## III. DENIALS

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



#### IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Mr. Baek pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Mr. Baek'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: Yong Baek O. dba 2 EZ Cleaners, Docket No. 2006-1463-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 Mr. Baek 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."

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 and reliable data collection processes to support informed decision-making.

3. The third part of the document focuses on the role of technology in data management and analysis. It discusses how modern software solutions can streamline data collection, storage, and reporting, thereby improving efficiency and accuracy.

4. The fourth part of the document addresses the challenges associated with data management, such as data quality, security, and privacy. It provides strategies to mitigate these risks and ensure that data is used responsibly and ethically.

5. The fifth part of the document concludes by summarizing the key findings and recommendations. It stresses the importance of ongoing monitoring and evaluation to ensure that data management practices remain effective and aligned with the organization's goals.

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 procedures.

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 used to interpret the data and draw meaningful conclusions.

8. The eighth part of the document focuses on the presentation of data, including the use of tables, charts, and graphs. It provides guidelines for creating clear and concise reports that effectively communicate the results of the data analysis.

9. The ninth part of the document discusses the importance of data security and privacy. It outlines the measures that should be taken to protect sensitive data from unauthorized access and ensure compliance with relevant regulations.

10. The tenth part of the document provides a final summary and concludes the report. It reiterates the key findings and emphasizes the need for continuous improvement in data management practices.

11. The eleventh part of the document includes a list of references and a bibliography. It provides a comprehensive list of the sources used in the research and analysis, ensuring that the information is credible and verifiable.

12. The twelfth part of the document contains a list of appendices, which include additional data, tables, and figures that are not included in the main body of the report. These appendices provide a more detailed look at the data and analysis.

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:

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 Mr. Baek. Mr. Baek 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 Mr. Baek 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, Mr. Baek's failure to comply is not a violation of this Agreed Order. Mr. Baek shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Mr. Baek shall notify the Executive Director within seven days after Mr. Baek 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 Mr. Baek shall be made in writing to the Executive Director. Extensions are not effective until Mr. Baek 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 Mr. Baek 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 Mr. Baek, or three days after the date on which the Commission mails notice of the Order to Mr.

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 the collected data is used to identify trends, assess risks, and make strategic decisions that align with the organization's goals and objectives.

4. The fourth part of the document addresses the challenges and limitations of data analysis. It acknowledges that while data provides valuable insights, it is not infallible and must be interpreted with care, taking into account potential biases and uncertainties.

5. The fifth part of the document discusses the future of data analysis and the role of emerging technologies. It explores how artificial intelligence, machine learning, and big data are transforming the way organizations collect, analyze, and use data to drive innovation and growth.

6. The sixth part of the document provides a summary of the key findings and conclusions. It reiterates the importance of data in decision-making and the need for a robust data management strategy to maximize the value of the organization's data assets.

7. The seventh part of the document offers recommendations for further research and action. It suggests that organizations should continue to invest in data infrastructure and talent to stay competitive in a data-driven world.

8. The eighth part of the document provides a final conclusion, emphasizing that data is a powerful tool for understanding the world and making better decisions. It encourages organizations to embrace a data-driven culture and to use data to their advantage.

9. The ninth part of the document includes a list of references and sources used in the research. It provides a comprehensive list of academic papers, books, and industry reports that informed the analysis and conclusions presented in the document.

10. The tenth part of the document is a concluding statement, expressing the author's hope that the findings and recommendations will be helpful to other organizations and researchers in the field of data analysis.

Yong Baek O. dba 2 EZ Cleaners  
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Baek, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.



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**SIGNATURE PAGE**

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

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

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

5/15/07  
\_\_\_\_\_  
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.

Yongbaek O  
\_\_\_\_\_  
Signature

5-4-07  
\_\_\_\_\_  
Date

YONG Baek O  
\_\_\_\_\_  
Name (Printed or typed)  
Authorized Representative of  
Yong Baek O. dba 2 EZ 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.

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