

EXECUTIVE SUMMARY - ENFORCEMENT MATTER
DOCKET NO.: 2006-2104-AIR-E TCEQ ID: RN102736089 CASE NO.: 31856
RESPONDENT NAME: Lucite International, Inc.

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 checked="" 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		

SITE WHERE VIOLATION(S) OCCURRED: Lucite Beaumont Site, 6350 North Twin City Highway, Nederland, Jefferson County

TYPE OF OPERATION: Petrochemical plant

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 April 9, 2007. No comments were received.

CONTACTS AND MAILING LIST:

TCEQ Attorney/SEP Coordinator: Ms. Melissa Keller, SEP Coordinator, Enforcement Division, MC 219, (512) 239-1768

TCEQ Enforcement Coordinator: Mr. Jorge Ibarra, Enforcement Division, Enforcement Section II, MC R-04, (817) 588-5890; Mr. Steven Lopez, Enforcement Division, MC 219, (512) 239-1896

Respondent: Mr. Shawn Haven, Environmental Specialist, Lucite International, Inc., 6350 North Twin City Highway, Nederland, Texas 77627

Mr. Kevin Burgason, Manufacturing Director, Lucite International, Inc., 6350 North Twin City Highway, Nederland, Texas 77627

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

RESPONDENT'S NAME: Lucite International, Inc.
DOCKET NO.: 2006-2104-AIR-E

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>Type of Investigation: <input type="checkbox"/> Complaint <input type="checkbox"/> Routine <input type="checkbox"/> Enforcement Follow-up <input checked="" type="checkbox"/> Records Review</p> <p>Date of Complaint Relating to this Case: None</p> <p>Date of Investigation Relating to this Case: October 2, 2006</p> <p>Date of NOE Relating to this Case: November 27, 2006 (NOE)</p> <p>Background Facts: This was a routine record review. Two violations were documented.</p> <p>AIR</p> <p>1) Failed to report no later than 24 hours after the discovery of an emissions event. The event which began on April 27, 2006, at 10:30 am, was not initially reported until May 9, 2006, at 1:39 pm [30 TEX. ADMIN. CODE § 101.201(a)(1)(A) and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>2) Failed to prevent unauthorized emissions. On April 27, 2006, for a seven hour and 16 minute period, a reportable emissions event resulted in an unauthorized release of 817.22 pounds of sulfur dioxide from the Methyl Methacrylate Process Flare [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F) and (c), Air Permit No. 19003, Special Condition 3, Federal Operating Permit No. 1437, Special Terms and Conditions 12, and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p>	<p>Total assessed: \$2,600</p> <p>Total Deferred: \$520 <input checked="" type="checkbox"/> Expedited Settlement <input type="checkbox"/> Financial Inability to Pay</p> <p>SEP Conditional Offset: \$1,040</p> <p>Total Paid (Due) to General Revenue: \$1,040</p> <p>Site Compliance History Classification: <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification: <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Major Source: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Applicable Penalty Policy: September 2002</p>	<p>Corrective Actions Taken:</p> <p>1) The Executive Director recognizes that Lucite has documented on January 8, 2007 to the TCEQ the following corrective measures at the Plant:</p> <p>a. Implemented training of personnel to help ensure timely reporting of emissions events on November 7, 2006; and</p> <p>b. Replaced the acid feed pipe, the source of hard polymer buildup, breakoff, and plugging, in May 2006 to help prevent emissions events like that which occurred on April 27, 2006.</p> <p>Ordering Provisions:</p> <p>2) The Order will require the Respondent to implement and complete a Supplemental Environmental Project (SEP). (See SEP Attachment A)</p>

Attachment A
Docket Number: 2006-2104-AIR-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent: Lucite International, Inc.

Payable Penalty Amount: Two Thousand Eighty Dollars (\$2,080)

SEP Amount: One Thousand Forty Dollars (\$1,040)

Type of SEP: Pre-approved

Third-Party Recipient: Jefferson County: Retrofit/Replacement of Heavy Equipment and Vehicles with Alternative Fueled Equipment and Vehicles

Location of SEP: Jefferson County

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative Penalty Amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

A. Project

The Respondent shall contribute to the Third-Party Recipient pursuant to the agreement between the Third-Party Recipient and the TCEQ. Specifically, the Third-Party Recipient will contribute to Jefferson County for its Retrofit/Replacement of Heavy Equipment and Vehicles with Alternative Fueled Equipment and Vehicles. Specifically, the contribution will be used to purchase alternative fueled equipment such as propane or electric powered lawn mowers, propane powered light duty and heavy equipment, and alternative fueled vehicles and retire diesel and gasoline powered equipment and vehicles. Jefferson County will also convert current equipment and vehicles to alternative fueled equipment in order to lower emissions.

All dollars contributed will be used solely for the direct cost of the project and no portion will be spent on administrative costs. The SEP will be done in accordance with all federal, state and local environmental laws and regulations.

The Respondent certifies that there is no prior commitment to make this contribution and that it is being done solely in an effort to settle this enforcement action.

B. Environmental Benefit

This SEP will provide a discernible environmental benefit by reducing air emissions generated by gasoline and diesel powered equipment and vehicles in the Beaumont/Port Arthur ozone non-attainment area.

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C. Minimum Expenditure

The Respondent shall contribute at least the SEP Amount to the Third-Party Recipient and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Amount to the Third-Party Recipient. The Respondent shall mail the contribution, with a copy of the Agreed Order, to:

The Honorable Ron Walker
Jefferson County Judge
1149 Pearl Street, 4th Floor
Beaumont, Texas 77701

3. Records and Reporting

Concurrent with the payment of the SEP Amount, the Respondent shall provide the TCEQ SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Enforcement Division
Attention: SEP Coordinator, MC 219
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this SEP in any way, including full payment of the SEP Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP Amount.

The check for any amount due shall be made out to "Texas Commission on Environmental Quality" and mailed to:

Texas Commission on Environmental Quality
Financial Administration Division, Revenues
Attention: Cashier, MC 214
P.O. Box 13088
Austin, Texas 78711-3088

The Respondent shall also mail a copy of the check to the TCEQ SEP Coordinator at the address in Section 3 above.

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

2. It is essential to ensure that all financial data is properly documented and organized in a systematic manner to facilitate accurate reporting and analysis.

3. The second section outlines the various methods and tools used to collect and analyze financial data, including the use of spreadsheets and specialized software.

4. It is important to regularly review and update the financial records to reflect any changes in the business's operations and financial status.

5. The third part of the document provides a detailed overview of the financial statements, including the balance sheet, income statement, and cash flow statement.

6. Each financial statement is explained in detail, highlighting the key components and how they are calculated and presented.

7. The fourth section discusses the importance of comparing financial performance over time and against industry benchmarks.

8. This analysis helps to identify trends, strengths, and areas for improvement, providing valuable insights into the business's financial health.

9. The fifth part of the document covers the process of preparing and presenting financial reports to stakeholders, including investors and management.

10. It emphasizes the need for transparency and accuracy in the reporting process, as well as the importance of clear communication and explanation of the data.

11. The final section concludes by summarizing the key findings and recommendations, and offers suggestions for further research and analysis.

12. Overall, this document provides a comprehensive guide to understanding and managing financial data, ensuring that businesses can make informed decisions and maintain financial stability.

5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as an SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that this is essential 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 ensure the validity of the findings.

3. The third part of the document describes the results of the data analysis and the key findings. It notes that the data indicates a significant trend in the market, which has implications for the organization's strategy and operations.

4. The fourth part of the document provides a detailed analysis of the data, including a breakdown of the results by category and a comparison with previous data. It also discusses the potential causes and consequences of the observed trends.

5. The fifth part of the document offers recommendations and conclusions based on the findings. It suggests that the organization should consider implementing certain changes to improve its performance and address the identified issues.

6. The sixth part of the document provides a summary of the key points and a final conclusion. It reiterates the importance of the findings and the need for continued monitoring and evaluation of the organization's performance.

7. The seventh part of the document includes a list of references and a bibliography. It cites the sources used in the research and provides information on how to access these resources.

8. The eighth part of the document contains a list of appendices and a glossary. It provides additional information and definitions related to the research and the data analysis.

9. The ninth part of the document includes a list of figures and tables. It provides a visual representation of the data and the results of the analysis, making it easier to understand the findings.



Penalty Calculation Worksheet (PCW)

DATES	Assigned	4-Dec-2006	Screening	5-Dec-2006	EPA Due	27-Aug-2007
	PCW	11-Jan-2007				

RESPONDENT/FACILITY INFORMATION			
Respondent	Lucite International, Inc.		
Reg. Ent. Ref. No.	RN102736089		
Facility/Site Region	10-Beaumont	Major/Minor Source	Major

CASE INFORMATION			
Enf./Case ID No.	31856	No. of Violations	2
Docket No.	2006-2104-AIR-E	Order Type	1660
Media Program(s)	Air Quality	Enf. Coordinator	John Barry
Multi-Media		EC's Team	Enforcement Team 6
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$10,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) *Subtotal 1* \$2,600

ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History 25% Enhancement *Subtotals 2, 3, & 7* \$650

Notes: Enhancement is due to one order with denial of liability and one same-or-similar NOV.

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

Notes: Respondent does not meet the culpability criteria.

Good Faith Effort to Comply 25% Reduction *Subtotal 5* \$650

	Before NOV	NOV to EDP RP/Settlement Offer
Extraordinary		
Ordinary	X	
N/A		(mark with x)

Notes: Lucite completed corrective actions on November 7, 2006.

Total EB Amounts \$16 **Approx. Cost of Compliance** \$1,500 **0% Enhancement*** *Subtotal 6* \$0
*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7 *Final Subtotal* \$2,600

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 \$2,600

STATUTORY LIMIT ADJUSTMENT *Final Assessed Penalty* \$2,600

DEFERRAL 20% Reduction *Adjustment* -\$520

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

Notes:

Deferral offered for expedited settlement.

PAYABLE PENALTY \$2,080

Screening Date 5-Dec-2006

Docket No. 2006-2104-AIR-E

PCW

Respondent Lucite International, Inc.

Policy Revision 2 (September 2002)

Case ID No. 31856

PCW Revision November 17, 2006

Reg. Ent. Reference No. RN102736089

Media [Statute] Air Quality

Enf. Coordinator John Barry

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)	1	20%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	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%
Please Enter Yes or No			
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) 25%

>> 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

Enhancement is due to one order with denial of liability and one same-or-similar NOV.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 25%

Screening Date 5-Dec-2006

Docket No. 2006-2104-AIR-E

PCW

Respondent Lucite International, Inc.

Policy Revision 2 (September 2002)

Case ID No. 31856

PCW Revision November 17, 2006

Reg. Ent. Reference No. RN102736089

Media [Statute] Air Quality

Enf. Coordinator John Barry

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code § 101.201(a)(1)(A) and Tex. Health & Safety Code § 382.085(b)

Violation Description Failed to report no later than 24 hours after the discovery of an emissions event. The event which began on April 27, 2006, at 10:30 am, was not initially reported until May 9, 2006, at 1:39 pm.

Base Penalty \$10,000

>> Environmental, Property and Human Health Matrix

Release	Harm			Percent
	Major	Moderate	Minor	
Actual				0%
Potential				

>> Programmatic Matrix

Falsification	Harm			Percent
	Major	Moderate	Minor	
			X	1%
Matrix Notes	More than 70% of the rule was met.			

Adjustment \$9,900

\$100

Violation Events

Number of Violation Events 1 Number of violation days 11

daily	
monthly	
quarterly	
semiannual	
annual	
single event	X

Violation Base Penalty \$100

One single event is recommended.

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$13

Violation Final Penalty Total \$100

This violation Final Assessed Penalty (adjusted for limits) \$100

Economic Benefit Worksheet

Respondent: Lucite International, Inc.
Case ID No.: 31856
Reg. Ent. Reference No.: RN102736089
Media: Air Quality
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

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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				0.0	\$0	n/a	\$0
Other (as needed)	\$500	27-Apr-2006	7-Nov-2006	0.5	\$13	n/a	\$13

Notes for DELAYED costs

Estimated costs of training to help assure timely reporting of emissions events; the date required was the date of the emissions event; the final date is the date of training completion.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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

\$500

TOTAL

\$13

Screening Date 5-Dec-2006

Docket No. 2006-2104-AIR-E

PCW

Respondent Lucite International, Inc.

Policy Revision 2 (September 2002)

Case ID No. 31856

PCW Revision November 17, 2006

Reg. Ent. Reference No. RN102736089

Media [Statute] Air Quality

Enf. Coordinator John Barry

Violation Number 2

Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(b)(2)(F) and (c), Air Permit No. 19003, Special Condition 3, Federal Operating Permit No. 1437, Special Terms and Conditions 12, and Tex. Health & Safety Code § 382.085(b)

Violation Description Failed to prevent unauthorized emissions. On April 27, 2006, for a seven hour and 16 minute period, a reportable emissions event resulted in an unauthorized release of 817.22 pounds of sulfur dioxide from the Methyl Methacrylate ("MMA") Process Flare. Since the emissions event was not properly reported, Lucite failed to meet the demonstrations for an affirmative defense under 30 Tex. Admin. Code § 101.222.

Base Penalty \$10,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			X
Potential			

Percent 25%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0%

Matrix Notes

Human health or the environment has been exposed to insignificant amounts of pollutants which did not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$7,500

\$2,500

Violation Events

Number of Violation Events 1

1 Number of violation days

daily	
monthly	
quarterly	
semiannual	
annual	
single event	X

mark only one with an x

Violation Base Penalty \$2,500

One single violation is recommended.

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$2

Violation Final Penalty Total \$2,500

This violation Final Assessed Penalty (adjusted for limits) \$2,500

Economic Benefit Worksheet

Respondent: Lucite International, Inc.
Case ID No.: 31856
Reg. Ent. Reference No.: RN102736089
Media: Air Quality
Violation No.: 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
No commas or \$							

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				0.0	\$0	n/a	\$0
Other (as needed)	\$1,000	27-Apr-2006	15-May-2006	0.0	\$2	n/a	\$2

Notes for DELAYED costs

Estimated costs to determine cause of polymer plugging and to implement corrective measures; the date required is the date of the emissions event; the final date is the approximate date of cause determination and corrective action.

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

\$1,000

TOTAL

\$2

Compliance History

Customer/Respondent/Owner-Operator: CN601448764 Lucite International, Inc. Classification: AVERAGE Rating: 3.24
 Regulated Entity: RN102736089 LUCITE BEAUMONT SITE Classification: AVERAGE Site Rating: 2.46

ID Number(s):	AIR NEW SOURCE PERMITS	PERMIT	19005
	AIR NEW SOURCE PERMITS	PERMIT	19004
	AIR NEW SOURCE PERMITS	PERMIT	19003
	AIR NEW SOURCE PERMITS	PERMIT	29568
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	JE0425E
	AIR NEW SOURCE PERMITS	PERMIT	53554
	AIR NEW SOURCE PERMITS	AFS NUM	0136
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX753
	AIR NEW SOURCE PERMITS	PERMIT	1743
	AIR NEW SOURCE PERMITS	PERMIT	2796A
	AIR NEW SOURCE PERMITS	PERMIT	318
	AIR NEW SOURCE PERMITS	REGISTRATION	79737
	AIR NEW SOURCE PERMITS	REGISTRATION	80291
	AIR OPERATING PERMITS	PERMIT	1437
	AIR OPERATING PERMITS	ACCOUNT NUMBER	JE0425E
	AIR OPERATING PERMITS	PERMIT	1959
	AIR OPERATING PERMITS	PERMIT	1960
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD988088761
	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	81282
	PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION	1230066

Location: 6350 N TWIN CITY HWY, NEDERLAND, TX, 77627 Rating Date: September 01 06 Repeat Violator: NO

TCEQ Region: REGION 10 - BEAUMONT
 Date Compliance History Prepared: December 04, 2006
 Agency Decision Requiring Compliance History: Enforcement
 Compliance Period: December 04, 2001 to December 04, 2006

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

Name: John Barry Phone: (409) 899-8781

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? Yes
3. If Yes, who is the current owner? Lucite International, Inc.
4. If Yes, who was/were the prior owner(s)? Ineos Acrylics, Inc.
5. When did the change(s) in ownership occur? 5/7/2002 -name change only

Components (Multimedia) for the Site :

A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

1660 Effective Date: 12/15/2005 ADMINORDER 2005-0310-AIR-E
 Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
 5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to properly notify the regional office of a reportable emissions event within 24 hours from the discovery of the event which occurred on September 12, 2004.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 19003, Special Condition 1 PERMIT

Description: Failed to maintain an emission rate below the allowable emission limit at EPN 357 during an emissions event which occurred on September 12, 2004 and lasted 9 hours and 51 minutes.

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 05/31/2005 (393525)
- 2 10/20/2004 (292104)
- 3 04/04/2003 (27587)
- 4 04/26/2006 (460716)
- 5 02/27/2006 (457064)
- 6 12/21/2005 (440007)
- 7 02/28/2006 (457230)
- 8 04/21/2006 (461908)
- 9 01/31/2005 (343751)
- 10 01/04/2006 (450132)
- 11 01/03/2002 (87450)
- 12 01/03/2002 (87451)
- 13 01/03/2002 (87452)
- 14 02/23/2006 (454749)
- 15 01/03/2002 (87453)
- 16 01/30/2002 (87454)
- 17 01/30/2002 (87455)
- 18 01/30/2002 (87456)
- 19 01/30/2002 (87457)
- 20 02/28/2006 (457587)
- 21 03/14/2002 (87458)
- 22 03/14/2002 (87459)
- 23 03/14/2002 (87460)
- 24 03/14/2002 (87461)
- 25 03/14/2002 (87462)
- 26 06/24/2002 (87463)
- 27 06/24/2002 (87464)
- 28 09/25/2002 (11817)
- 29 06/25/2002 (87465)
- 30 06/26/2002 (87466)
- 31 06/26/2002 (87467)
- 32 09/25/2002 (11816)
- 33 02/28/2006 (457291)
- 34 09/25/2002 (11814)
- 35 05/11/2006 (464040)
- 36 11/01/2006 (511600)
- 37 04/11/2006 (461173)
- 38 07/30/2004 (284838)
- 39 06/14/2004 (274802)
- 40 02/11/2004 (258840)
- 41 02/28/2006 (457248)
- 42 11/10/2005 (435904)
- 43 11/23/2004 (338187)
- 44 06/17/2005 (392967)
- 45 11/27/2006 (465011)
- 46 02/21/2006 (454858)

E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

SS

Date: 11/23/2004 (338187)

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT IA

Description: Failure to maintain records of H2SO4 acid produced on a daily basis.

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov:

PERMIT IA

Description: Failure to maintain records of nitrogen oxide emissions at the H2SO4 unit main stack on a three-hour average.

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT IA

Description: Failure to maintain records of nitrogen oxide emissions from the No. 1 and No. 2 Preheaters.

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT IA

Description: Failure to span the nitrogen oxide CEMS at the North Preheater Stack on a daily basis.

F. Environmental audits.

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
LUCITE INTERNATIONAL, INC.
RN102736089**

§
§
§
§
§

**BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY**

AGREED ORDER DOCKET NO. 2006-2104-AIR-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 Lucite International, Inc. ("Lucite") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and Lucite appear before the Commission and together stipulate that:

1. Lucite owns and operates a petrochemical plant at 6350 North Twin City Highway, in Nederland, Jefferson County, Texas (the "Plant").
2. The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
3. The Commission and Lucite agree that the Commission has jurisdiction to enter this Agreed Order, and that Lucite is subject to the Commission's jurisdiction.
4. Lucite received notice of the violations alleged in Section II ("Allegations") on or about December 2, 2006.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Lucite of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of Two Thousand Six Hundred Dollars (\$2,600) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Lucite has paid One Thousand Forty Dollars (\$1,040) of the administrative penalty and Five Hundred Twenty Dollars (\$520) is deferred contingent upon Lucite'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 Lucite fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require Lucite to pay all or part of the deferred penalty. One Thousand Forty Dollars (\$1,040) shall be conditionally offset by Lucite's completion of a Supplemental Environmental Project ("SEP").
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 Lucite 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 Lucite has documented on January 8, 2007 to the TCEQ the following corrective measures at the Plant:
 - a. Implemented training of personnel to help ensure timely reporting of emissions events on November 7, 2006; and
 - b. Replaced the acid feed pipe, the source of hard polymer buildup, breakoff, and plugging, in May 2006 to help prevent emissions events like that which occurred on April 27, 2006.
 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 Lucite 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

As owner and operator of the Plant, Lucite is alleged to have:

1. Failed to report no later than 24 hours after the discovery of an emissions event, in violation of 30 TEX. ADMIN. CODE § 101.201(a)(1)(A) and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on October 2, 2006. The event which began on April 27, 2006, at 10:30 am, was not initially reported until May 9, 2006, at 1:39 pm.
2. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F) and (c), Air Permit No. 19003, Special Condition 3, Federal Operating Permit No. 1437, Special Terms and Conditions 12, and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on October 2, 2006. On April 27, 2006, for a seven hour and 16 minute period, a reportable emissions event resulted in an unauthorized release of 817.22 pounds of sulfur dioxide from the Methyl Methacrylate ("MMA")

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice. This ensures transparency and allows for easy auditing of the accounts.

Furthermore, it is noted that regular reconciliation of bank statements with the company's ledger is essential. This process helps identify any discrepancies early on and prevents them from becoming major issues. Consistent record-keeping is the foundation of sound financial management.

In addition, the document highlights the need for clear communication between all stakeholders involved in the financial process. Regular meetings and reports should be provided to keep everyone informed of the current financial status and any potential risks or opportunities.

Overall, the goal is to establish a robust financial system that not only tracks expenses and income accurately but also provides valuable insights into the company's performance. This will enable better decision-making and long-term financial stability.

The second section of the document focuses on budgeting and cost control. It provides a detailed breakdown of the monthly budget and compares it against actual spending. This analysis helps identify areas where costs are exceeding expectations and where savings can be realized.

Key areas of concern include the marketing department's advertising costs and the operations department's utility expenses. While these areas show some variance, it is noted that overall spending remains within the allocated budget. The document concludes with recommendations for future budgeting cycles.

It is recommended that the marketing team explore more cost-effective advertising channels and that the operations team review utility contracts for better rates. Regular monitoring and reporting will continue to be required to ensure the budget is adhered to throughout the next period.

The final part of the document provides a summary of the overall financial health of the company. It states that the company is in a strong position, with a healthy cash flow and a solid profit margin. The management team is confident in the company's ability to meet its financial goals for the coming year.

Process Flare. Since the emissions event was not properly reported, Lucite failed to meet the demonstrations for an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.

III. DENIALS

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

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Lucite pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Lucite'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: Lucite International, Inc., Docket No. 2006-2104-AIR-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. Lucite shall implement and complete a SEP in accordance with TEX. WATER CODE § 7.067. As set forth in Section I, Paragraph 6 above, One Thousand Forty Dollars (\$1,040) of the assessed administrative penalty shall be offset with the condition that Lucite implement the SEP defined in Attachment A, incorporated herein by reference. Lucite's obligation to pay the conditionally offset portion of the administrative penalty assessed shall be discharged upon final completion of all provisions of the SEP agreement.
3. The provisions of this Agreed Order shall apply to and be binding upon Lucite. Lucite is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the operations referenced in this Agreed Order.
4. If Lucite 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, Lucite's failure to comply is not a violation of this Agreed Order. Lucite shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Lucite shall notify the Executive Director within seven days after Lucite 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 Lucite shall be made in writing to the Executive Director. Extensions are not effective until Lucite receives written

The first part of the document discusses the importance of maintaining accurate records. It emphasizes that proper record-keeping is essential for ensuring the integrity and reliability of the data collected. This section also outlines the various methods used to collect and analyze the data, highlighting the challenges faced during the process.

In the second part, the focus shifts to the results of the study. The data shows a clear trend in the behavior of the system under investigation, which is consistent with the theoretical predictions. The analysis reveals that the system's performance is significantly affected by the parameters being studied, and these effects are more pronounced at higher values of the independent variables.

The third part of the document provides a detailed discussion of the experimental setup and the conditions under which the data was collected. It describes the apparatus used, the range of parameters tested, and the methods employed to ensure the accuracy of the measurements. This section also includes a comparison of the experimental results with the theoretical models, showing a good agreement between the two.

Finally, the document concludes with a summary of the findings and their implications. The results suggest that the system's behavior is highly sensitive to the parameters being studied, and that the theoretical models provide a good approximation of the experimental observations. The study also highlights the need for further research to explore the underlying mechanisms of the observed phenomena.

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 Lucite 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 Lucite, or three days after the date on which the Commission mails notice of the Order to Lucite, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. This is essential for ensuring the integrity of the financial statements and for providing a clear audit trail. The records should be kept up-to-date and should be easily accessible to all relevant parties.

2. The second part of the document outlines the procedures for handling any discrepancies or errors that may arise. It is important to identify the source of the error as soon as possible and to take appropriate corrective action. This may involve adjusting the records and notifying the relevant parties.

3. The third part of the document discusses the role of the internal control system in preventing and detecting errors. A well-designed internal control system can help to ensure that all transactions are recorded accurately and that any errors are identified and corrected promptly.

4. The fourth part of the document provides a summary of the key points discussed above. It emphasizes the importance of maintaining accurate records, handling errors promptly, and implementing a strong internal control system. These measures are essential for ensuring the reliability of the financial statements and for providing a clear audit trail.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission



For the Executive Director

5/22/07

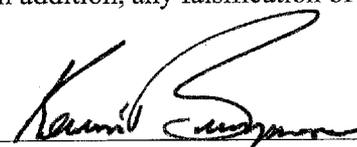
Date

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

1/29/07

Date

KEVIN BURKASOV

Name (Printed or typed)
Authorized Representative of
Lucite International, Inc.

LUCITE MANUFACTURING DIRECTOR

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.

1/24/07

United States of America

United States of America

Handwritten signature or scribble



1/24/07

Attachment A
Docket Number: 2006-2104-AIR-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	Lucite International, Inc.
Payable Penalty Amount:	Two Thousand Eighty Dollars (\$2,080)
SEP Amount:	One Thousand Forty Dollars (\$1,040)
Type of SEP:	Pre-approved
Third-Party Recipient:	Jefferson County: Retrofit/Replacement of Heavy Equipment and Vehicles with Alternative Fueled Equipment and Vehicles
Location of SEP:	Jefferson County

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative Penalty Amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

A. Project

The Respondent shall contribute to the Third-Party Recipient pursuant to the agreement between the Third-Party Recipient and the TCEQ. Specifically, the Third-Party Recipient will contribute to Jefferson County for its Retrofit/Replacement of Heavy Equipment and Vehicles with Alternative Fueled Equipment and Vehicles. Specifically, the contribution will be used to purchase alternative fueled equipment such as propane or electric powered lawn mowers, propane powered light duty and heavy equipment, and alternative fueled vehicles and retire diesel and gasoline powered equipment and vehicles. Jefferson County will also convert current equipment and vehicles to alternative fueled equipment in order to lower emissions.

All dollars contributed will be used solely for the direct cost of the project and no portion will be spent on administrative costs. The SEP will be done in accordance with all federal, state and local environmental laws and regulations.

The Respondent certifies that there is no prior commitment to make this contribution and that it is being done solely in an effort to settle this enforcement action.

B. Environmental Benefit

This SEP will provide a discernible environmental benefit by reducing air emissions generated by gasoline and diesel powered equipment and vehicles in the Beaumont/Port Arthur ozone non-attainment area.

THE UNIVERSITY OF CHICAGO
DEPARTMENT OF CHEMISTRY

PHYSICAL CHEMISTRY LABORATORY

REPORT ON THE EXPERIMENT

THE RATE OF REACTION

OF HYDROGEN PEROXIDE

WITH POTASSIUM IODIDE

BY

JOHN H. HARRIS

PH.D. THESIS

1928

Submitted to the Faculty of the Division of Physical Sciences in partial fulfillment of the requirements for the degree of Doctor of Philosophy

CHICAGO, ILLINOIS

UNIVERSITY OF CHICAGO PRESS

1928

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C. Minimum Expenditure

The Respondent shall contribute at least the SEP Amount to the Third-Party Recipient and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Amount to the Third-Party Recipient. The Respondent shall mail the contribution, with a copy of the Agreed Order, to:

The Honorable Ron Walker
Jefferson County Judge
1149 Pearl Street, 4th Floor
Beaumont, Texas 77701

3. Records and Reporting

Concurrent with the payment of the SEP Amount, the Respondent shall provide the TCEQ SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Enforcement Division
Attention: SEP Coordinator, MC 219
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this SEP in any way, including full payment of the SEP Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP Amount.

The check for any amount due shall be made out to "Texas Commission on Environmental Quality" and mailed to:

Texas Commission on Environmental Quality
Financial Administration Division, Revenues
Attention: Cashier, MC 214
P.O. Box 13088
Austin, Texas 78711-3088

The Respondent shall also mail a copy of the check to the TCEQ SEP Coordinator at the address in Section 3 above.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that this is essential 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 effective 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 integration. It provides strategies to overcome these challenges and ensure the integrity and availability of data.

5. The fifth part of the document discusses the importance of data governance and compliance. It outlines the key principles and practices for ensuring that data is managed in a responsible and lawful manner, in accordance with applicable regulations and standards.

6. The sixth part of the document explores the future of data management and analysis. It discusses emerging trends and technologies, such as artificial intelligence and big data, and their potential impact on the field.

7. The seventh part of the document provides a summary of the key findings and conclusions of the study. It emphasizes the need for a holistic approach to data management that integrates all aspects of the organization's operations.

8. The eighth part of the document offers recommendations for further research and implementation. It suggests areas where additional data and analysis are needed to refine the current findings and improve the effectiveness of data management practices.

9. The ninth part of the document discusses the role of leadership and culture in successful data management. It highlights the importance of fostering a data-driven culture where data is used to inform decision-making and drive organizational success.

10. The tenth part of the document provides a final summary and conclusion. It reiterates the key points of the document and emphasizes the ongoing nature of data management and the need for continuous improvement and adaptation to changing circumstances.

5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as an SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.

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

2. It then goes on to describe the various methods used to collect and analyze data.

3. The next section details the results of the study, showing a clear trend towards higher productivity.

4. Finally, the document concludes with a series of recommendations for future research.

5. The overall findings suggest that the implementation of the new system has been highly successful.

6. This success is attributed to the thorough planning and execution of the project.

7. The data collected over the course of the study provides strong evidence for these conclusions.

8. The results are consistent across all tested scenarios, indicating a robust and reliable system.

9. The study also highlights the need for ongoing monitoring and evaluation to ensure long-term success.

10. In conclusion, the project has demonstrated significant potential for improving operational efficiency.

11. The findings are particularly relevant for organizations looking to optimize their internal processes.

12. The success of this project serves as a model for other similar initiatives.

13. The data shows a clear correlation between the implementation of the system and the observed improvements.

14. The study also identifies key areas for further research and development.

15. The overall impact of the project is positive and far-reaching.

16. The results are a testament to the power of well-executed change management.

17. The study provides valuable insights into the challenges and opportunities of digital transformation.

18. The findings are a clear indication of the benefits of investing in modern technology.