

**EXECUTIVE SUMMARY - ENFORCEMENT MATTER**

**DOCKET NO.:** 2006-0934-DCL-E **TCEQ ID:** RN104028444 **CASE NO.:** 30126  
**RESPONDENT NAME:** Dillard Dry Cleaning & Restoration, Inc. dba Marvel Cleaners

<b>ORDER TYPE:</b>		
<input checked="" type="checkbox"/> 1660 AGREED ORDER	<input type="checkbox"/> FINDINGS AGREED ORDER	<input type="checkbox"/> FINDINGS ORDER FOLLOWING SOAH HEARING
<input type="checkbox"/> FINDINGS DEFAULT ORDER	<input type="checkbox"/> SHUTDOWN ORDER	<input type="checkbox"/> IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
<input type="checkbox"/> AMENDED ORDER	<input type="checkbox"/> EMERGENCY ORDER	
<b>CASE TYPE:</b>		
<input type="checkbox"/> AIR	<input type="checkbox"/> MULTI-MEDIA (check all that apply)	<input type="checkbox"/> INDUSTRIAL AND HAZARDOUS WASTE
<input type="checkbox"/> PUBLIC WATER SUPPLY	<input type="checkbox"/> PETROLEUM STORAGE TANKS	<input type="checkbox"/> OCCUPATIONAL CERTIFICATION
<input type="checkbox"/> WATER QUALITY	<input type="checkbox"/> SEWAGE SLUDGE	<input type="checkbox"/> UNDERGROUND INJECTION CONTROL
<input type="checkbox"/> MUNICIPAL SOLID WASTE	<input type="checkbox"/> RADIOACTIVE WASTE	<input checked="" type="checkbox"/> DRY CLEANER REGISTRATION
<p><b>SITE WHERE VIOLATION(S) OCCURRED:</b> Marvel Cleaners, 5414 Brentwood Stair Road, Fort Worth, Tarrant County</p> <p><b>TYPE OF OPERATION:</b> Dry cleaner</p> <p><b>SMALL BUSINESS:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><b>OTHER SIGNIFICANT MATTERS:</b> There are no complaints. There is no record of additional pending enforcement actions regarding this facility location.</p> <p><b>INTERESTED PARTIES:</b> No one other than the ED and the Respondent has expressed an interest in this matter.</p> <p><b>COMMENTS RECEIVED:</b> The <i>Texas Register</i> comment period expired on August 6, 2007. No comments were received.</p> <p><b>CONTACTS AND MAILING LIST:</b>  <b>TCEQ Attorney/SEP Coordinator:</b> None  <b>TCEQ Enforcement Coordinator:</b> Ms. Audra Ruble, Enforcement Division, Enforcement Team 4, R-14, (361) 825-3126; Mr. Steven Lopez, Enforcement Division, MC 219, (512) 239-1896  <b>Respondent:</b> Ms. Michelle Dillard, Owner, Marvel Cleaners, 5414 Brentwood Stair Road, Fort Worth, Texas 76112  <b>Respondent's Attorney:</b> Not represented by counsel on this enforcement matter</p>		

**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(s) 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> June 27, 2006 (NOE)</p> <p><b>Background Facts:</b> This was a routine investigation. One violation was documented.</p> <p><b>WASTE</b></p> <p>As owner and operator of the Facility, Dillard Dry Cleaning is alleged to have failed to renew the Facility's registration by completing and submitting the required registration form to the TCEQ for the Facility [30 TEX. ADMIN. CODE § 337.11(e) and TEX. HEALTH &amp; SAFETY CODE § 374.102].</p>	<p><b>Total Assessed:</b> \$889</p> <p><b>Total Deferred:</b> \$178  <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> \$111 (the remaining \$600 to be paid in 6 monthly payments of \$100 each)</p> <p><b>Site Compliance History Classification</b>  <input type="checkbox"/> High <input type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p><b>Person Compliance History Classification</b>  <input type="checkbox"/> High <input type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p><b>Major Source:</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><b>Applicable Penalty Policy:</b> September 2002</p>	<p><b>Corrective Actions Taken:</b></p> <p>The Executive Director recognizes that Dillard Dry Cleaning submitted a current registration for the Facility on June 14, 2006.</p>



Policy Revision 2 (September 2002)

# Penalty Calculation Worksheet (PCW)

PCW Revision May 19, 2005

<b>DATES</b>	Assigned	05-Jul-2006	Screening	06-Jul-2006	EPA Due	
	PCW	07-Jul-2006				

<b>RESPONDENT/FACILITY INFORMATION</b>	
Respondent	Dillard Dry Cleaning & Restoration, Inc. dba Marvel Cleaners
Reg. Ent. Ref. No.	RN104028444
Facility/Site Region	4-Dallas/Fort Worth
Major/Minor Source	Minor Source

<b>CASE INFORMATION</b>			
Enf./Case ID No.	30126	No. of Violations	1
Docket No.	2006-0934-DCL-E	Order Type	1660
Media Program(s)	Drycleaner	Enf. Coordinator	Audra L. Ruble
Multi-Media		EC's Team	Enforcement Team 8
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$50

## Penalty Calculation Section

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

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

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

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

<b>Good Faith Effort to Comply</b>	25% Reduction	<b>Subtotal 5</b>	<b>-\$296</b>
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	Before NOV	NOV to EDCRP/Settlement Offer
Extraordinary		
Ordinary	X	
N/A		(mark with a small x)

Notes: The respondent came into compliance before the Notice of Enforcement was issued.

<b>Economic Benefit</b>	0% Enhancement*	<b>Subtotal 6</b>	<b>\$0</b>
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Total EB Amounts	\$10	*Capped at the Total EB \$ Amount
Approx. Cost of Compliance	\$250	

<b>SUM OF SUBTOTALS 1-7</b>	<b>Final Subtotal</b>	<b>\$889</b>
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<b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b>		<b>Adjustment</b>	<b>\$0</b>
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Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

Notes:

<b>Final Penalty Amount</b>	<b>\$889</b>
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<b>STATUTORY LIMIT ADJUSTMENT</b>	<b>Final Assessed Penalty</b>	<b>\$889</b>
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<b>DEFERRAL</b>	20% Reduction	<b>Adjustment</b>	<b>-\$178</b>
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Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes: Deferral offered for expedited settlement.

<b>PAYABLE PENALTY</b>	<b>\$711</b>
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<b>Screening Date</b>	06-Jul-2006	<b>Docket No.</b>	2006-0934-DCL-E	<b>PCW</b>
<b>Respondent</b>	Dillard Dry Cleaning & Restoration, Inc. dba Marvel Cleaners		Policy Revision 2 (September 2002)	
<b>Case ID No.</b>	30126	PCW Revision May 19, 2005		
<b>Reg. Ent. Reference No.</b>	RN104028444			
<b>Media [Statute]</b>	Drycleaner			
<b>Enf. Coordinator</b>	Audra L. Ruble			

**Compliance History Worksheet**

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

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

**Adjustment Percentage (Subtotal 2)**

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

**Adjustment Percentage (Subtotal 3)**

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

**Adjustment Percentage (Subtotal 7)**

>> **Compliance History Summary**

**Compliance History Notes**

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

<b>Screening Date</b>	06-Jul-2006	<b>Docket No.</b>	2006-0934-DCL-E	<b>PCW</b>
<b>Respondent</b>	Dillard Dry Cleaning & Restoration, Inc. dba Marvel Cleaners		<i>Policy Revision 2 (September 2002)</i>	
<b>Case ID No.</b>	30126	<i>PCW Revision May 19, 2005</i>		
<b>Reg. Ent. Reference No.</b>	RN104028444			
<b>Media [Statute]</b>	Drycleaner			
<b>Enf. Coordinator</b>	Audra L. Ruble			
<b>Violation Number</b>	1			
<b>Primary Rule Cite(s)</b>	30 Tex. Admin. Code § 337.11(e)			
<b>Secondary Rule Cite(s)</b>	Tex. Health & Safety Code § 374.102			
<b>Violation Description</b>	The respondent failed to renew the facility's registration by completing and submitting the required registration form to the TCEQ for a dry cleaning and/or drop station facility.			
<b>Base Penalty</b>				\$50

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

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

OR

>> **Programmatic Matrix**

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

Matrix Notes

**Adjustment**

**Base Penalty Subtotal**

**Violation Events**

Number of Violation Events

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

**Violation Base Penalty**

<b>Economic Benefit (EB) for this violation</b>	<b>Statutory Limit Test</b>
<b>Estimated EB Amount</b> <input type="text" value="\$10"/>	<b>Violation Final Penalty Total</b> <input type="text" value="\$889"/>
<b>This violation Final Assessed Penalty (adjusted for limits)</b> <input type="text" value="\$889"/>	

### Economic Benefit Worksheet

**Respondent:** Dillard Dry Cleaning & Restoration, Inc. dba Marvel Cleaners  
**Case ID No.:** 30126  
**Reg. Ent. Reference No.:** RN104028444  
**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	14-Jun-2006	0.8	\$10	n/a	\$10
Other (as needed)				0.0	\$0	n/a	\$0

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

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

Notes for AVOIDED costs:

Approx. Cost of Compliance \$250

**TOTAL** \$10

## Compliance History

Customer/Respondent/Owner-Operator:	CN602837296	Dillard Dry Cleaning & Restoration, Inc.	Classification:	Rating:
Regulated Entity:	RN104028444	MARVEL CLEANERS	Classification:	Site Rating:
ID Number(s):				
Location:	5414 BRENTWOOD STAIR RD, FORT WORTH, TX, 76112			
TCEQ Region:	REGION 04 - DFW METROPLEX			
Date Compliance History Prepared:	July 06, 2006			
Agency Decision Requiring Compliance History:	Enforcement			
Compliance Period:	July 06, 2001 to July 06, 2006			

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

Name: Audra Ruble Phone: 361-825-3126

### Site Compliance History Components

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

### Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.  
N/A
  - B. Any criminal convictions of the state of Texas and the federal government.  
N/A
  - C. Chronic excessive emissions events.  
N/A
  - D. The approval dates of investigations. (CCEDS Inv. Track. No.)  
1 06/29/2006 (484197)
  - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)  
N/A
  - F. Environmental audits.  
N/A
  - G. Type of environmental management systems (EMSs).  
N/A
  - H. Voluntary on-site compliance assessment dates.  
N/A
  - I. Participation in a voluntary pollution reduction program.  
N/A
  - J. Early compliance.  
N/A
- Sites Outside of Texas  
N/A

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1. The first part of the document discusses the general situation of the country and the state of the economy. It mentions the impact of the war and the need for a new economic policy.

2. The second part of the document discusses the specific measures that have been taken to address the economic challenges. It includes details about the new tax system and the changes to the currency.

3. The third part of the document discusses the future prospects of the country and the role of the government in the economy. It emphasizes the need for a strong and stable government.

4. The fourth part of the document discusses the social and cultural aspects of the country. It mentions the importance of education and the role of the arts in society.

5. The fifth part of the document discusses the international relations of the country. It mentions the need for a policy of peace and cooperation with other nations.

6. The sixth part of the document discusses the role of the individual citizen in the country. It emphasizes the importance of civic duty and the need for a strong sense of community.

7. The seventh part of the document discusses the role of the government in the economy. It mentions the need for a strong and stable government and the importance of public services.

8. The eighth part of the document discusses the role of the private sector in the economy. It mentions the need for a strong and stable government and the importance of private enterprise.

9. The ninth part of the document discusses the role of the military in the country. It mentions the need for a strong and stable government and the importance of a well-trained and equipped military.

10. The tenth part of the document discusses the role of the judiciary in the country. It mentions the need for a strong and stable government and the importance of an independent and impartial judiciary.

11. The eleventh part of the document discusses the role of the press in the country. It mentions the need for a strong and stable government and the importance of a free and independent press.

12. The twelfth part of the document discusses the role of the labor unions in the country. It mentions the need for a strong and stable government and the importance of a strong and independent labor movement.

13. The thirteenth part of the document discusses the role of the farmers in the country. It mentions the need for a strong and stable government and the importance of a strong and independent agricultural sector.

14. The fourteenth part of the document discusses the role of the industrial workers in the country. It mentions the need for a strong and stable government and the importance of a strong and independent industrial sector.

15. The fifteenth part of the document discusses the role of the small business owners in the country. It mentions the need for a strong and stable government and the importance of a strong and independent small business sector.

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN  
ENFORCEMENT ACTION  
CONCERNING  
DILLARD DRY CLEANING &  
RESTORATION, INC. DBA MARVEL  
CLEANERS  
RN104028444**

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**BEFORE THE  
  
TEXAS COMMISSION ON  
  
ENVIRONMENTAL QUALITY**

## **AGREED ORDER DOCKET NO. 2006-0934-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 Dillard Dry Cleaning & Restoration, Inc. dba Marvel Cleaners ("Dillard Dry Cleaning") 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 Dillard Dry Cleaning appear before the Commission and together stipulate that:

1. Dillard Dry Cleaning owns and operates a dry cleaner located at 5414 Brentwood Stair Road in Fort Worth, Tarrant 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 Dillard Dry Cleaning agree that the Commission has jurisdiction to enter this Agreed Order, and that Dillard Dry Cleaning is subject to the Commission's jurisdiction.
4. Dillard Dry Cleaning received notice of the violations alleged in Section II ("Allegations") on or about July 2, 2006.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Dillard Dry Cleaning of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of Eight Hundred Eighty-Nine Dollars (\$889) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Dillard Dry Cleaning has paid One Hundred Eleven Dollars (\$111) of the administrative penalty and One Hundred Seventy-Eight Dollars (\$178) is deferred contingent upon Dillard Dry Cleaning'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 Dillard Dry Cleaning fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require Dillard Dry Cleaning to pay all or part of the deferred penalty.

The remaining amount of Six Hundred Dollars (\$600) of the administrative penalty shall be payable in six monthly payments of One Hundred Dollars (\$100) each. The next monthly payment shall be paid within 30 days after the effective date of this Agreed Order. The subsequent payments shall each be paid not later than 30 days following the due date of the previous payment until paid in full. If Dillard Dry Cleaning 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 Dillard Dry Cleaning to meet the payment schedule of this Agreed Order constitutes the failure by Dillard Dry Cleaning 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 Dillard Dry Cleaning 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 Dillard Dry Cleaning submitted a current registration for the Facility on June 14, 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 Dillard Dry Cleaning 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 Facility, Dillard Dry Cleaning is alleged to have failed to renew the Facility's registration by completing and submitting the required registration form to the TCEQ for the Facility, in violation of 30 TEX. ADMIN. CODE § 337.11(e) and TEX. HEALTH & SAFETY CODE § 374.102, as documented during an investigation conducted on May 25, 2006.

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 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 reliability of the data.

5. The fifth part of the document discusses the importance of data governance and the role of various stakeholders in ensuring that data is used responsibly and in compliance with relevant regulations and standards.

6. The sixth part of the document explores the future of data management, including emerging trends such as artificial intelligence, machine learning, and cloud computing, and their potential impact on the field.

7. The seventh part of the document provides a summary of the key findings and recommendations from the study. It emphasizes the need for a holistic approach to data management that considers both technical and organizational aspects.

8. The eighth part of the document discusses the implications of the findings for practice, highlighting the need for organizations to invest in data management capabilities and to foster a data-driven culture.

9. The ninth part of the document provides a conclusion and a call to action, urging organizations to take proactive steps to improve their data management practices and to embrace the opportunities offered by data.

10. The tenth part of the document includes a list of references and a bibliography, providing sources for further reading and research on the topics discussed in the document.

11. The eleventh part of the document provides a list of appendices, including detailed data tables, charts, and supplementary information that supports the main findings of the study.

12. The twelfth part of the document includes a list of figures and tables, providing a visual representation of the data and results presented in the document.

13. The thirteenth part of the document provides a list of abbreviations and acronyms used throughout the document, ensuring clarity and consistency in the terminology.

14. The fourteenth part of the document includes a list of footnotes and endnotes, providing additional information and references related to the main text.

15. The fifteenth part of the document provides a list of contact information for the authors and the organization, including email addresses and phone numbers, for further inquiries or collaboration.

### III. DENIALS

Dillard Dry Cleaning generally denies each allegation in Section II ("Allegations").

### IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Dillard Dry Cleaning pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Dillard Dry Cleaning'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: Dillard Dry Cleaning & Restoration, Inc. dba Marvel Cleaners, Docket No. 2006-0934-DCL-E" to:  
  
Financial Administration Division, Revenues Section  
Attention: Cashier's Office, MC 214  
Texas Commission on Environmental Quality  
P.O. Box 13088  
Austin, Texas 78711-3088
2. The provisions of this Agreed Order shall apply to and be binding upon Dillard Dry Cleaning. Dillard Dry Cleaning is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
3. If Dillard Dry Cleaning 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, Dillard Dry Cleaning's failure to comply is not a violation of this Agreed Order. Dillard Dry Cleaning shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Dillard Dry Cleaning shall notify the Executive Director within seven days after Dillard Dry Cleaning becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
4. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by Dillard Dry Cleaning shall be made in writing to the Executive Director. Extensions are not effective until Dillard Dry Cleaning receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
5. This Agreed Order, issued by the Commission, shall not be admissible against Dillard Dry Cleaning in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.



6. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
7. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to Dillard Dry Cleaning, or three days after the date on which the Commission mails notice of the Order to Dillard Dry Cleaning, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.



## SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

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

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

7/25/07  
\_\_\_\_\_  
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

May 31, 2007  
\_\_\_\_\_  
Date

Michelle Dillard  
\_\_\_\_\_  
Name (Printed or typed)  
Authorized Representative of  
Dillard Dry Cleaning & Restoration, Inc. dba Marvel 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.

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

2. It also highlights the need for regular audits to ensure the integrity of the financial data.

3. Furthermore, the document emphasizes the role of transparency in building trust with stakeholders.

4. In addition, it notes that clear communication is essential for the successful implementation of any financial strategy.

5. Finally, the document concludes by stating that a strong financial foundation is crucial for long-term organizational success.

6. The following table provides a detailed breakdown of the financial performance over the last quarter.

7. It is important to note that the data presented in this table is preliminary and subject to change.

8. The next section will analyze the key drivers of growth and identify areas for improvement.

9. Overall, the document aims to provide a comprehensive overview of the company's financial health.

10. We encourage all employees to stay informed and actively participate in our financial goals.

11. Thank you for your continued support and dedication to our organization.

12. For more information, please contact the finance department at [contact information].

13. We look forward to achieving our financial targets and driving sustainable growth.

14. The following chart illustrates the trend in our revenue over the past year.

15. This visual representation helps to clearly see the impact of our marketing efforts.

16. We are confident that these insights will guide our future strategic decisions.

17. Please refer to the appendix for a complete list of the data sources used in this report.

18. We appreciate your attention and hope this document provides valuable information.