

**EXECUTIVE SUMMARY - ENFORCEMENT MATTER**

**DOCKET NO.:** 2006-1082-DCL-E **TCEQ ID:** RN104096029, RN104968110, and RN100619741

**CASE NO.:** 30536

**RESPONDENT NAME:** S. J. & Sons, Inc. dba Country Cleaners, Professional Cleaners and Ultra Fine 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> Country Cleaners, 12336 West Airport Boulevard, Suite A, Stafford, Fort Bend County; Professional Cleaners, 5022 Highway 90A, Suite F, Sugar Land, Fort Bend County; and Ultra Fine Cleaners, 12288 Westheimer Road, Suite 290, Houston, Harris County</p> <p><b>TYPE OF OPERATION:</b> Drop stations and/or dry cleaning facilities</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 these facility locations.</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 December 10, 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> Mr. Jorge Ibarra, Enforcement Division, DFW Regional Office, MC R-04, (817) 588-5890; Mr. Bryan Sinclair, Enforcement Division, MC 219, (512) 239-2171  <b>Respondent:</b> Ms. Fatima S. Dhukka, President, S. J. &amp; Sons, Inc., 12288 Westheimer Road, Suite 290, Houston, Texas 77077  <b>Respondent's Attorney:</b> Not represented by counsel on this enforcement matter</p>		

DOCKET NO.: 2006-1082-DCL-E

**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 Investigations Relating to this Case:</b> May 23, 2006, May 30, 2006, and June 2, 2006</p> <p><b>Date of NOEs Relating to this Case:</b> July 28, 2006, August 11, 2006, and August 29, 2006 (NOE)</p> <p><b>Background Facts:</b> These were routine scheduled investigations. Three violations were observed.</p> <p><b>WASTE</b></p> <p>1) Failure to renew the registration by completing and submitting the required registration form to the TCEQ for Facility No. 1 [30 TEX. ADMIN. CODE § 337.11(e) and TEX. HEALTH &amp; SAFETY CODE § 374.102].</p> <p>2) Failure to complete and submit the required registration form to the TCEQ for Facility No. 2 [30 TEX. ADMIN. CODE § 337.10(a) and TEX. HEALTH &amp; SAFETY CODE § 374.102].</p> <p>3) Failure to renew the registration by completing and submitting the required registration form to the TCEQ for Facility No. 3 [30 TEX. ADMIN. CODE § 337.11(e) and TEX. HEALTH &amp; SAFETY CODE § 374.102].</p>	<p><b>Total Assessed:</b> \$2,844</p> <p><b>Total Deferred:</b> \$569  <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 to General Revenue:</b> \$2,275</p> <p>RN104968110 and RN104096029  <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>RN100619741  <b>Site Compliance History Classification</b>  <input checked="" type="checkbox"/> High <input type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p><b>Person Compliance History Classification</b>  <input type="checkbox"/> High <input checked="" 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 the Respondent has implemented the following corrective measures at the Facilities:</p> <p>a) Renewed the registration for Facility No. 1 by completing and submitted the required registration form to the TCEQ on June 12, 2006;</p> <p>b) Completed and submitted the required registration form to the TCEQ for Facility No. 2 on June 12, 2006; and</p> <p>c) Renewed the registration for Facility No. 3 by completing and submitting the required registration form to the TCEQ on August 30, 2006.</p>

Additional ID No(s): N/A



DATES	Assigned	31-Jul-2006	Screening	31-Jul-2006	EPA Due	
	PCW	01-Aug-2006				

<b>RESPONDENT/FACILITY INFORMATION</b>	
Respondent	S. J. & Sons, Inc. dba Country Cleaners
Reg. Ent. Ref. No.	RN104096029
Facility/Site Region	12-Houston < Major/Minor Source Minor Source <

<b>CASE INFORMATION</b>			
Enf./Case ID No.	30536	No. of Violations	1
Docket No.	2006-1082-DCL-E	Order Type	1660 <
Media Program(s)	Drycleaner <	Enf. Coordinator	Jorge Ibarra, P.E.
Multi-Media		EC's Team	Enforcement Team 4 <
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$50

### Penalty Calculation Section

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

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

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

**Compliance History** 0% Enhancement Subtotals 2, 3, & 7

Notes

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

Notes

**Good Faith Effort to Comply** 25% Reduction Subtotal 5

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

Notes

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

Total EB Amounts	<input type="text" value="\$10"/>	*Capped at the Total EB \$ Amount
Approx. Cost of Compliance	<input type="text" value="\$250"/>	

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

**OTHER FACTORS AS JUSTICE MAY REQUIRE**  Adjustment

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

Notes

**Final Penalty Amount**

**STATUTORY LIMIT ADJUSTMENT** Final Assessed Penalty

**DEFERRAL** 20% Reduction Adjustment

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

Notes

**PAYABLE PENALTY**

**Respondent** S. J. & Sons, Inc. dba Country Cleaners Policy Revision 2 (September 2002)  
**Case ID No.** 30536 PCW Revision May 19, 2005  
**Reg. Ent. Reference No.** RN104096029  
**Media [Statute]** Drycleaner  
**Enf. Coordinator** Jorge Ibarra, P.E.

**Compliance History Worksheet**

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

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

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

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

N/A

**Adjustment Percentage (Subtotal 3)** | 0%

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

N/A

**Adjustment Percentage (Subtotal 7)** | 0%

>> **Compliance History Summary**

**Compliance History Notes** The respondent does not have any other enforcement actions within the last five years.

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

**Respondent** S. J. & Sons, Inc. dba Country Cleaners

Policy Revision 2 (September 2002)

**Case ID No.** 30536

PCW Revision May 19, 2005

**Reg. Ent. Reference No.** RN104096029

**Media [Statute]** Drycleaner

**Enf. Coordinator** Jorge Ibarra, P.E.

**Violation Number** 1

**Primary Rule Cite(s)** 30 Tex. Admin. Code § 337.11(e)

**Secondary Rule Cite(s)** Tex. Health and Safety Code § 374.102

**Violation Description**  
 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.

**Base Penalty** \$50

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

Release	Harm			Percent
	Major	Moderate	Minor	
Actual				
Potential				

>> **Programmatic Matrix**

Falsification	Major	Moderate	Minor	Percent
	X			10%

**Matrix Notes**  
 100% of the rule requirement was not met.

**Adjustment** -\$45

**Base Penalty Subtotal** \$5

**Violation Events**

**Number of Violation Events** 237

mark only one use a small x	daily	X
	monthly	
	quarterly	
	semiannual	
	annual	
	single event	

**Violation Base Penalty** \$1,185

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** \$10

**Violation Final Penalty Total** \$889

**This violation Final Assessed Penalty (adjusted for limits)** \$889

**Respondent** S. J. & Sons, Inc. dba Country Cleaners  
**Case ID No.** 30536  
**Reg. Ent. Reference No.** RN104096029  
**Media [Statute]** Drycleaner  
**Violation No.** 1

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

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

<b>Avoided Costs</b>	<b>ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)</b>						
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

**TOTAL**

# Compliance History

Customer/Respondent/Owner-Operator:	CN603045295	S. J. & Sons, Inc.	Classification:	Rating:
Regulated Entity:	RN104096029	COUNTRY CLEANERS	Classification:	Site Rating:
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID		TXR000069823
Location:	12336 W AIRPORT BLVD STE A, STAFFORD, TX, 77477			
TCEQ Region:	REGION 12 - HOUSTON			
Date Compliance History Prepared:	July 31, 2006			
Agency Decision Requiring Compliance History:	Enforcement			
Compliance Period:	July 31, 2001 to July 31, 2006			

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

Name: Jorge Ibarra, P.E. Phone: (817) 588-5890

## 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 07/27/2006 (485993)
- 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





<b>DATES</b>	Assigned	14-Aug-2006	Screening	22-Aug-2006	EPA Due	
	PCW	23-Aug-2006				

<b>RESPONDENT/FACILITY INFORMATION</b>	
Respondent	S. J. & Sons, Inc. dba Professional Cleaners
Reg. Ent. Ref. No.	RN104968110
Facility/Site Region	12-Houston
Major/Minor Source	Minor Source

<b>CASE INFORMATION</b>			
Enf./Case ID No.	30536	No. of Violations	1
Docket No.	2006-1082-DCL-E	Order Type	1660
Media Program(s)	Drycleaner	Enf. Coordinator	Jorge Ibarra, P.E.
Multi-Media		EC's Team	Enforcement Team 4
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$50

## Penalty Calculation Section

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

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

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

**Compliance History** 0% Enhancement Subtotals 2, 3, & 7

Notes

**Culpability** No 0% Enhancement Subtotal 4

Notes

**Good Faith Effort to Comply** 25% Reduction Subtotal 5

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

Notes

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

Total EB Amounts	\$10	<small>*Capped at the Total EB \$ Amount</small>
Approx. Cost of Compliance	\$250	

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

**OTHER FACTORS AS JUSTICE MAY REQUIRE** Adjustment

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

Notes

**Final Penalty Amount**

**STATUTORY LIMIT ADJUSTMENT** Final Assessed Penalty

**DEFERRAL** 20% Reduction Adjustment

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

Notes

**PAYABLE PENALTY**

Screening Date 22-Aug-2006

Docket No. 2006-1082-DCL-E

PCW

Respondent S. J. & Sons, Inc. dba Professional Cleaners

Policy Revision 2 (September 2002)

Case ID No. 30536

PCW Revision May 19, 2005

Reg. Ent. Reference No. RN104968110

Media [Statute] Drycleaner

Enf. Coordinator Jorge Ibarra, P.E.

**Compliance History Worksheet**

>> Compliance History Site Enhancement (Subtotal 2)

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

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

>> Repeat Violator (Subtotal 3)

N/A

**Adjustment Percentage (Subtotal 3)** 0%

>> Compliance History Person Classification (Subtotal 7)

N/A

**Adjustment Percentage (Subtotal 7)** 0%

>> Compliance History Summary

Compliance History Notes

The respondent does not have any other enforcement actions within the last five years.

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

Screening Date 22-Aug-2006

Docket No. 2006-1082-DCL-E

PCW

Respondent S. J. & Sons, Inc. dba Professional Cleaners

Policy Revision 2 (September 2002)

Case ID No. 30536

PCW Revision May 19, 2005

Reg. Ent. Reference No. RN104968110

Media [Statute] Drycleaner

Enf. Coordinator Jorge Ibarra, P.E.

Violation Number 1

Primary Rule Cite(s) 30 Tex. Admin. Code § 337.10(a)

Secondary Rule Cite(s) Tex. Health and Safety Code § 374.102

Violation Description The respondent failed to complete and submit the required registration form to the TCEQ for a dry cleaning and/or drop station facility.

Base Penalty \$50

>> Environmental, Property and Human Health Matrix

Harm

Release	Major	Moderate	Minor
Actual			
Potential			

Percent

>> Programmatic Matrix

Falsification	Major	Moderate	Minor
	X		

Percent 10%

Matrix Notes 100% of the rule requirement was not met.

Adjustment -\$45

Base Penalty Subtotal \$5

Violation Events

Number of Violation Events 237

mark only one use a small x	daily	X
	monthly	
	quarterly	
	semiannual	
	annual	
	single event	

Violation Base Penalty \$1,185

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 \$10

Violation Final Penalty Total \$889

This violation Final Assessed Penalty (adjusted for limits) \$889

## Economic Benefit Worksheet

**Respondent** S. J. & Sons, Inc. dba Professional Cleaners  
**Case ID No.** 30536  
**Reg. Ent. Reference No.** RN104968110  
**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
<b>Delayed Costs</b>							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs	\$250	01-Sep-2005	12-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:	CN603045295 S. J. & Sons, Inc.	Classification:	Rating:
Regulated Entity:	RN104968110 PROFESSIONAL CLEANERS	Classification:	Site Rating:
ID Number(s):	INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXR000073627
Location:	5022 HIGHWAY 90A STE F, SUGAR LAND, TX, 77478		
TCEQ Region:	REGION 12 - HOUSTON		
Date Compliance History Prepared:	August 23, 2006		
Agency Decision Requiring Compliance History:	Enforcement		
Compliance Period:	August 23, 2001 to August 23, 2006		

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

Name: Jorge Ibarra, P.E. Phone: (817) 588-5890

## 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 08/11/2006 (497070)
- 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

The first part of the course deals with the theory of functions of a real variable. It begins with the study of the real number system, including the construction of the real numbers from the rational numbers. This is followed by a detailed treatment of the properties of the real number system, such as the least upper bound property and the Archimedean property.

The second part of the course is devoted to the theory of limits and continuity. It starts with the definition of a limit and the properties of limits, including the epsilon-delta definition. The concept of continuity is then introduced, and the various types of discontinuities are discussed. The Intermediate Value Theorem and the Weierstrass Theorem are also covered.

The third part of the course deals with the theory of differentiation. It begins with the definition of a derivative and the properties of derivatives, such as the chain rule and the product rule. The concept of differentiability is then introduced, and the various types of differentiable functions are discussed.

The fourth part of the course is devoted to the theory of integration. It starts with the definition of a definite integral and the properties of integrals, including the Riemann sum approximation. The concept of an indefinite integral is then introduced, and the various types of integrable functions are discussed.

The fifth part of the course deals with the theory of series. It begins with the study of the convergence of sequences and the properties of convergent sequences. The concept of a series is then introduced, and the various types of series are discussed, including the geometric series and the harmonic series.

The sixth part of the course is devoted to the theory of functions of a complex variable. It starts with the study of the complex number system and the properties of complex numbers. The concept of a function of a complex variable is then introduced, and the various types of functions are discussed.

The seventh part of the course deals with the theory of differential equations. It begins with the study of the solutions of ordinary differential equations and the properties of solutions. The concept of a partial differential equation is then introduced, and the various types of partial differential equations are discussed.

The eighth part of the course is devoted to the theory of vector spaces and linear transformations. It starts with the study of the properties of vector spaces and the definition of a linear transformation. The concept of a matrix is then introduced, and the various types of matrices are discussed.

The ninth part of the course deals with the theory of eigenvalues and eigenvectors. It begins with the study of the eigenvalues and eigenvectors of a matrix and the properties of eigenvalues and eigenvectors. The concept of a diagonal matrix is then introduced, and the various types of diagonal matrices are discussed.

The tenth part of the course is devoted to the theory of the calculus of variations. It starts with the study of the problem of finding the extremum of a functional and the properties of functionals. The concept of a variational problem is then introduced, and the various types of variational problems are discussed.

The eleventh part of the course deals with the theory of the calculus of variations. It begins with the study of the problem of finding the extremum of a functional and the properties of functionals. The concept of a variational problem is then introduced, and the various types of variational problems are discussed.

The twelfth part of the course is devoted to the theory of the calculus of variations. It starts with the study of the problem of finding the extremum of a functional and the properties of functionals. The concept of a variational problem is then introduced, and the various types of variational problems are discussed.

The thirteenth part of the course deals with the theory of the calculus of variations. It begins with the study of the problem of finding the extremum of a functional and the properties of functionals. The concept of a variational problem is then introduced, and the various types of variational problems are discussed.

The fourteenth part of the course is devoted to the theory of the calculus of variations. It starts with the study of the problem of finding the extremum of a functional and the properties of functionals. The concept of a variational problem is then introduced, and the various types of variational problems are discussed.

The fifteenth part of the course deals with the theory of the calculus of variations. It begins with the study of the problem of finding the extremum of a functional and the properties of functionals. The concept of a variational problem is then introduced, and the various types of variational problems are discussed.



<b>DATES</b>	<b>Assigned PCW</b>	06-Sep-2006	<b>Screening</b>	06-Sep-2006	<b>EPA Due</b>	
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<b>RESPONDENT/FACILITY INFORMATION</b>	
<b>Respondent</b>	S. J. & Sons, Inc. dba Ultra Fine Cleaners
<b>Reg. Ent. Ref. No.</b>	RN100619741
<b>Facility/Site Region</b>	12-Houston <
<b>Major/Minor Source</b>	Minor Source <

<b>CASE INFORMATION</b>			
<b>Enf./Case ID No.</b>	30536	<b>No. of Violations</b>	1
<b>Docket No.</b>	2006-1082-DCL-E	<b>Order Type</b>	1660 <
<b>Media Program(s)</b>	Drycleaner <	<b>Enf. Coordinator</b>	Jorge Ibarra, P.E.
<b>Multi-Media</b>		<b>EC's Team</b>	Enforcement Team 4 <
<b>Admin. Penalty \$ Limit Minimum</b>	\$0	<b>Maximum</b>	\$50

### Penalty Calculation Section

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

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

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

**Compliance History** 0% Enhancement **Subtotals 2, 3, & 7**

**Notes**

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

**Notes**

**Good Faith Effort to Comply** 10% Reduction **Subtotal 5**

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

**Notes**

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

Total EB Amounts	\$12	*Capped at the Total EB \$ Amount
Approx. Cost of Compliance	\$250	

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

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

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

**Notes**

**Final Penalty Amount**

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

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

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

**Notes**

**PAYABLE PENALTY**

Respondent S. J. & Sons, Inc. dba Ultra Fine Cleaners

Policy Revision 2 (September 2002)

Case ID No. 30536

PCW Revision May 19, 2005

Reg. Ent. Reference No. RN100619741

Media [Statute] Drycleaner

Enf. Coordinator Jorge Ibarra, P.E.

**Compliance History Worksheet**

>> Compliance History Site Enhancement (Subtotal 2)

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

>> 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

The Respondent does not have any other enforcement actions within the past five years.

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

Respondent S. J. & Sons, Inc. dba Ultra Fine Cleaners

Policy Revision 2 (September 2002)

Case ID No. 30536

PCW Revision May 19, 2005

Reg. Ent. Reference No. RN100619741

Media [Statute] Drycleaner

Enf. Coordinator Jorge Ibarra, P.E.

Violation Number 1

Primary Rule Cite(s) 30 Tex. Admin. Code § 337.11(e)

Secondary Rule Cite(s) Tex. Health and Safety Code § 374.102

Violation Description 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.

Base Penalty \$50

>> Environmental, Property and Human Health Matrix

		Harm			
Release		Major	Moderate	Minor	
OR	Actual				Percent
	Potential				

>> Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent
	X			10%

Matrix Notes 100% of the rule requirement was not met.

Adjustment -\$45

Base Penalty Subtotal \$5

Violation Events

Number of Violation Events 237

mark only one use a small x	daily	X
	monthly	
	quarterly	
	semiannual	
	annual	
	single event	

Violation Base Penalty \$1,185

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 \$12

Violation Final Penalty Total \$1,066

This violation Final Assessed Penalty (adjusted for limits) \$1,066

**Economic Benefit Worksheet**

**Respondent** S. J. & Sons, Inc. dba Ultra Fine Cleaners

**Case ID No.** 30536

**Reg. Ent. Reference No.** RN100619741

**Media [Statute]** Drycleaner

**Violation No.** 1

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

<b>Item Description</b>	<b>Item Cost</b>	<b>Date Required</b>	<b>Final Date</b>	<b>Yrs</b>	<b>Interest Saved</b>	<b>Onetime Costs</b>	<b>EB Amount</b>
<b>Delayed Costs</b>							
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-Aug-2006	1.0	\$12	n/a	\$12
Other (as needed)				0.0	\$0	n/a	\$0

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

<b>Avoided Costs</b>	<b>ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)</b>						
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

**TOTAL**

## Compliance History

Customer/Respondent/Owner-Operator:	CN603045295 S. J. & Sons, Inc.	Classification: AVERAGE	Rating: 3.01
Regulated Entity:	RN100619741 ULTRA FINE CLEANERS	Classification: HIGH	Site Rating: 0.00
ID Number(s):	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	HG4522W
Location:	12288 WESTHEIMER RD STE 290, HOUSTON, TX, 77077	Rating Date: September 01 06	Repeat Violator: NO
TCEQ Region:	REGION 12 - HOUSTON		
Date Compliance History Prepared:	December 17, 2007		
Agency Decision Requiring Compliance History:	Enforcement		
Compliance Period:	September 06, 2001 to September 06, 2006		

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

Name: Jorge Ibarra, P.E. Phone: 817/588-5890

### 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?   | <u>S. J. &amp; Sons, Inc.</u>    |
| 4. If Yes, who was/were the prior owner(s)?  | <u>Ultra Fine Cleaners, Inc.</u> |
| 5. When did the change(s) in ownership occur?  | <u>09/06/2006</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	07/21/2003	(144540)
2	08/29/2006	(487707)
  - 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



# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



<b>IN THE MATTER OF AN</b>	<b>§</b>	<b>BEFORE THE</b>
<b>ENFORCEMENT ACTION</b>	<b>§</b>	
<b>CONCERNING</b>	<b>§</b>	
<b>S. J. &amp; SONS, INC. DBA COUNTRY</b>	<b>§</b>	
<b>CLEANERS, PROFESSIONAL</b>	<b>§</b>	<b>TEXAS COMMISSION ON</b>
<b>CLEANERS AND ULTRA FINE</b>	<b>§</b>	
<b>CLEANERS</b>	<b>§</b>	
<b>RN104096029, RN104968110 AND</b>	<b>§</b>	
<b>RN100619741</b>	<b>§</b>	<b>ENVIRONMENTAL QUALITY</b>

## **AGREED ORDER DOCKET NO. 2006-1082-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 S. J. & Sons, Inc. dba Country Cleaners, Professional Cleaners, and Ultra Fine Cleaners ("S. J. & Sons") 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 S. J. & Sons appear before the Commission and together stipulate that:

1. S. J. & Sons owns and operates drop stations and/or dry cleaning facilities at the following locations ("the Facilities"):
  - a. Country Cleaners, 12336 West Airport Boulevard, Suite A, Stafford, Fort Bend County, Texas ("Facility No. 1");
  - b. Professional Cleaners, 5022 Highway 90A, Suite F, Sugar Land, Fort Bend County, Texas ("Facility No. 2"); and
  - c. Ultra Fine Cleaners, 12288 Westheimer Road, Suite 290, Houston, Harris County, Texas ("Facility No. 3").
2. The TCEQ has general authority to regulate the Facility pursuant to TEX. HEALTH & SAFETY CODE § 374.051.
3. The Commission and S. J. & Sons agree that the Commission has jurisdiction to enter this Agreed Order, and that S. J. & Sons is subject to the Commission's jurisdiction.



4. S. J. & Sons received notices of the violations alleged in Section II ("Allegations") on or about August 1, 2006, August 16, 2006, and September 3, 2006.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by S. J. & Sons of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of Two Thousand Eight Hundred Forty-Four Dollars (\$2,844) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). S. J. & Sons has paid Two Thousand Two Hundred Seventy-Five Dollars (\$2,275) of the administrative penalty and Five Hundred Sixty-Nine Dollars (\$569) is deferred contingent upon S. J. & Sons' 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 S. J. & Sons fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require S. J. & Sons to pay all or part of the deferred penalty.
7. Any notice and procedures which might otherwise be authorized or required in this action are waived in the interest of a more timely resolution of the matter.
8. The Executive Director of the TCEQ and S. J. & Sons 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 S. J. & Sons has implemented the following corrective measures at the Facilities:
  - a. Renewed the registration for Facility No. 1 by completing and submitting the required registration form to the TCEQ on June 12, 2006;
  - b. Completed and submitted the required registration form to the TCEQ for Facility No. 2 on June 12, 2006; and
  - c. Renewed the registration for Facility No. 3 by completing and submitting the required registration form to the TCEQ on August 30, 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 S. J. & Sons 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 Facilities, S. J. & Sons is alleged to have:

1. Failed to renew the registration by completing and submitting the required registration form to the TCEQ for Facility No. 1, 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 23, 2006.
2. Failed to complete and submit the required registration form to the TCEQ for Facility No. 2, in violation of 30 TEX. ADMIN. CODE § 337.10(a) and TEX. HEALTH & SAFETY CODE § 374.102, as documented during an investigation conducted on June 2, 2006.
3. Failed to renew the registration by completing and submitting the required registration form to the TCEQ for Facility No. 3, 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 30, 2006.

## III. DENIALS

S. J. & Sons generally denies each allegation in Section II ("Allegations").

## IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that S. J. & Sons pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and S. J. & Sons' 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: S. J. & Sons, Inc. dba Country Cleaners, Professional Cleaners, and Ultra Fine Cleaners Docket No. 2006-1082-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 S. J. & Sons. S. J. & Sons is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facilities operations referenced in this Agreed Order.
3. This Agreed Order, issued by the Commission, shall not be admissible against S. J. & Sons 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.

4. 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.
5. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to S. J. & Sons, or three days after the date on which the Commission mails notice of the Order to S. J. & Sons, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.



S. J. & Sons, Inc. dba Country Cleaners, Professional Cleaners, and Ultra Fine Cleaners  
DOCKET NO. 2006-1082-DCL-E  
Page 5

**SIGNATURE PAGE**

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

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

*John S. Doolin*  
For the Executive Director

\_\_\_\_\_  
Date 1/21/2008

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 failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- 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;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

*Fatima Dhukka*  
Signature

Dec 27 2007  
Date

Fatima Dhukka  
Name (Printed or typed)  
Authorized Representative of  
S. J. & Sons, Inc. dba Country Cleaners,  
Professional Cleaners, and Ultra Fine Cleaners

President  
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.

