EXECUTIVE SUMMARY - ENFORCEMENT MATTER

Page 1 of 3

DOCKET NO.: 2008-1024-AIR-E **TCEQ ID:** RN100777648 **CASE NO.:** 36108

RESPONDENT NAME: The Imaging Bureau, Inc.

·		
ORDER TYPE:		
X 1660 AGREED ORDER	FINDINGS AGREED ORDER	FINDINGS ORDER FOLLOWING SOAH HEARING
FINDINGS DEFAULT ORDER	_SHUTDOWN ORDER	IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
AMENDED ORDER	EMERGENCY ORDER	
CASE TYPE:		
<u>X</u> AIR	MULTI-MEDIA (check all that apply)	INDUSTRIAL AND HAZARDOUS WASTE .
PUBLIC WATER SUPPLY	PETROLEUM STORAGE TANKS	OCCUPATIONAL CERTIFICATION
WATER QUALITY	SEWAGE SLUDGE	UNDERGROUND INJECTION CONTROL
MUNICIPAL SOLID WASTE	RADIOACTIVE WASTE	DRY CLEANER REGISTRATION
TYPE OF OPERATION: Commercial prints SMALL BUSINESS:X_Yes OTHER SIGNIFICANT MATTERS: A comperations with the emission control equipment location. INTERESTED PARTIES: A complaint was Agenda. COMMENTS RECEIVED: The Texas Reg CONTACTS AND MAILING LIST: TCEQ Attorney/SEP Coordinator TCEQ Enforcement Coordinator Bryan Sinclair, Enforcement Division	mplaint was received April 4, 2008, alleging that the ent turned off. There is no record of additional pends received, but the complainant has not expressed a consister comment period expired on November 3, 2008 r: None : Mr. Thomas Jecha, Enforcement Division, E	e Respondent was conducting printing ing enforcement actions regarding this facility desire to protest this action or to speak at No comments were received. ement Team 3, MC 169, (512) 239-2576; Mr.
	sented by counsel on this enforcement matter	

DOCKET NO.: 2008-1024-AIR-E

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION

Type of Investigation:

- X Complaint
- ___ Routine
- ___ Enforcement Follow-up
- Records Review

Date(s) of Complaints Relating to this Case: April 4, 2008

Date of Investigation Relating to this Case: April 4, 2008

Date of NOV/NOE Relating to this Case: June 2, 2008 (NOE)

Background Facts: This was a complaint investigation.

AIR

- 1) Failure to post required information on all equipment. Specifically, the thermal and catalytic oxidizers were missing operating manuals and emission point identification numbers [30 Tex. ADMIN. CODE § 116.115(c), Permit No. 47553, Special Condition Nos. 2, 11, and 15, and Tex. Health & Safety Code § 382.085(b)].
- 2) Failure to use cleaning solutions with a volatile organic compound ("VOC") content of less than 70% and store waste ink, solvents, printing oil, and cleanup cloths in closed containers. Specifically, the Plant used a cleaning solution (Sure Wash) with a 100% VOC content and storage containers of waste ink, solvents, printing oil, and cleanup cloths were open [30 Tex. Admin. Code §§ 115.442(1)(F)(ii) and 116.115(c), Permit No. 47553, Special Condition Nos. 5B, 26A, and 26C, and Tex. Health & Safety Code § 382.085(b)].
- 3) Failure to cease operation of the heatset press and dryer when the combustion chamber of the thermal oxidizer is less than 1400 degrees Fahrenheit.

 Specifically, the digital readout of the thermal oxidizer indicated it was operating at 266 and 289 degrees Fahrenheit during two runs of the heatset press and dryer [30 Tex. Admin. Code § 116.115(c), Permit

PENALTY CONSIDERATIONS

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Total Assessed: \$6,290

Total Deferred: \$1,258

X Expedited Settlement

Financial Inability to Pay

SEP Conditional Offset: \$0

Total Paid (Due) to General Revenue: \$423 (remaining \$4,609 due in 11 monthly payments of \$419 each)

Site Compliance History Classification High X Average Poor

Person Compliance History Classification
High X Average Poor

Major Source: Yes X No

Applicable Penalty Policy: September 2002

CORRECTIVE ACTIONS TAKEN/REQUIRED

Corrective Actions Taken:

The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Plant, as documented by information received from the Respondent on June 20, 2008:

- a. Posted operating instructions and identification numbers on the thermal and catalytic oxidizers by May 20, 2008;
- b. Closed waste containers and switched to a cleaning solution with a VOC content of less than 70% by April 28, 2008;
- c. Installed a relay to prevent operation of the heatset press and dryer by May 7, 2008:
- d. Began performing required inspections of the oxidizers by June 1, 2008;
- e. Installed the catalytic oxidizer recorder and calibrated the thermal oxidizer recorder by May 7, 2008; and
- f. Added VOC and HAP rolling 12 month emissions totals and thermal oxidizer to efficiency data to the records by May 8, 2008.

Ordering Provisions:

The Order will require the Respondent to:

- a. Within 30 days after the effective date of this Agreed Order, submit proposed methods to accomplish emissions sampling for the dryer and catalytic oxidizer; and
- b. Within 45 days after the effective date of this Agreed Order, submit written certification and include detailed supporting documentation to demonstrate compliance with Ordering Provision a.

RESPONDENT NAME: The Imaging Bureau, Inc. DOCKET NO.: 2008-1024-AIR-E

No. 47553, Special Condition No. 9, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

- 4) Failure to perform required inspections. Specifically, temperature checks and monthly visual inspections of the thermal oxidizer and audio, visual, and olfactory inspections of the catalytic oxidizer, were not being performed [30 Tex. ADMIN. CODE § 116.115(c), Permit No. 47553, Special Condition Nos. 12, 13, 18, and 22, and Tex. Health & Safety Code § 382.085(b)].
- 5) Failure to equip the catalytic oxidizer with a continuous temperature recorder and calibrate the thermal oxidizer continuous temperature recorder. Specifically, a monitor to continuously record temperature was not installed on the catalytic oxidizer and the thermal oxidizer recorder chart indicated a temperature of 250 degrees Fahrenheit during two runs when the digital readout showed it was actually operating at 266 and 289 degrees Fahrenheit [30 Tex. ADMIN. CODE §§ 115.446(1) and 116.115(c), Permit No. 47553, Special Condition Nos. 10 and 20, and Tex. Health & Safety Code § 382.085(b)]:
- 6) Failure to maintain complete records. Specifically, thermal oxidizer efficiency data and calculations of rolling 12 month emissions totals for VOCs and hazardous air pollutants ("HAPs") were not found in the records [30 Tex. ADMIN. CODE §§ 115.446(7) and 116.115(c), Permit No. 47553, Special Condition Nos. 25C, D, and I, and Tex. Health & Safety Code § 382.085(b)].
- 7) Failure to submit proposed sampling methods within 30 days after the printing press, dryer, and the catalytic oxidizer reaches normal operating conditions. Specifically, emissions sampling methods should have been submitted by March 20, 2008 since the printing press associated with the catalytic oxidizer began its first commercial run on February 20, 2008 [30 Tex. Admin. Code § 116.115(c), Permit No. 47553, Special Condition No. 24C(1), and Tex. Health & Safety Code § 382.085(b)].

Additional ID No(s).: Air Permit 47553

		Calculation	n Worksheet (F	PCW)	
Policy Revision 2 (Se	ptember 2002)			PCW Rev	rision April 29, 2008
ICEQ	I o	Cara Calabara da Mara Cara Calabara	*245.50 ** ** ** ** ** ** ** ** ** ** ** ** **		
DATES Assigned PCV	del by a production of the state of the stat	g 17-Jun-2008	EPA Due	1	
1 01	7 20-5011-2000 Octeenin	g 17-0011-2000	Lr A Due		······
RESPONDENT/FACILIT	W. Control of the Con			Section 2011	
	t The Imaging Bureau, Inc.				
Reg. Ent. Ref. No				Tre	
Facility/Site Region	4-Dallas/Fort Worth		Major/Minor Source	Minor	
CASE INFORMATION					
Enf./Case ID No	. 36108		No. of Violations	7	
Docket No	. 2008-1024-AIR-E		Order Type		
Media Program(s		37 (3.4)	Government/Non-Profit		
Multi-Media			Enf. Coordinator	20	
Admin. Penalty \$	Limit Minimum \$0	Maximum [\$10,000	Enforcement Team 3	<u>V. Sp. 1.43</u>
Admin, I charty w	φο	Intaximum	Ψ10,000 [······································	······································
	Pena	alty Calculat	tion Section		
TOTAL BASE PENA	LTY (Sum of violation	base penalties	5)	Subtotal 1	\$7,300
ADJUSTMENTS (+/-	TO SUBTOTAL 1				
Subtotals 2-7 are obta	ained by multiplying the Total Base F	Penalty (Subtotal 1) by t	he indicated percentage.		
	tory		Enhancement Subt	otals 2, 3, & 7	\$365
	Enhancement for one NO\	/ with same or sim	ilar violations issued to the		· ·
Notes	2 Hallian 2 - 2 (1) 292 (2000) 1 (1) (2) 1 (1) (1) (1) (2) 1 (1) (2) 1 (1) (2) 2 (1) (2) (2) 2 (1) (2) (2) 2 (1) (2) (2) 2 (1) (2) (2) 2 (1) (2) (2) 2 (1) (2) (2) 2 (1) (2) (2) 2 (1) (2) (2) 2 (1) (2) (2) (2) 2 (1) (2) (2) (2) 2 (1) (2) (2) (2) 2 (1) (2) (2) (2) 2 (1) (2) (2) (2) 2 (1) (2) (2) (2) 2 (1) (2) (2) (2) 2 (1) (2) (2) (2) 2 (1) (2) (2) (2) 2 (1) (2) (2) (2) 2 (1) (2) (2) (2) 2 (1) (2) (2) (2) (2) (2) 2 (1) (2) (2) (2) (2) (2) 2 (1) (2) (2) (2) (2) (2) (2) (2) (2) (2) (2	ent within the past		1	
			<u> Madalah Maril Maringan di Maringa</u>		
Culpability	No	0.0%	Enhancement	Subtotal 4	· \$0
Notes	ine Respondent	does not meet the	culpability criteria.		
	**************************************	4455 <u>4846286868686</u>	<u> v 1989 let regji. Al 14 de Gersel e Sal</u>		
Good Faith Effo	rt to Comply Total Adjustm	nents		Subtotal 5	\$1,575
27					
Economic Bene	fit Total EB Amounts \$214		Enhancement* at the Total EB \$ Amount	Subtotal 6	\$0
Approx	. Cost of Compliance \$2,950	Сарреи	it the Total LD \$ Amount		
SUM OF SUBTOTAL	.S 1-7			Final Subtotal	\$6,090
			veceznosori en		
	S JUSTICE MAY REQUESTABLE CONTROL OF THE CONTROL OF		3.3%	Adjustment	\$200
Reduces of enhances the Final	Subtotal by the indicated percentage	337723 325 325 375 375		3	
Notes	Enhancement recommend	\$55000 Anning Property Common			
	with the ecor	nomic benefit of vio	olation No. 4.		
•			Final Pe	nalty Amount	\$6,290
STATUTORY LIMIT	ADJUSTMENT		Final Asse	essed Penalty	\$6,290
			- Particular and the second of		
DEFERRAL			20.0% Reduction	Adjustment	-\$1,258
Reduces the Final Assessed Pe	nalty by the indicted percentage. <i>(E</i>	nter number only; e.g.	20 for 20% reduction.)	1 .	
Notes	Deferral off	ered for expedited	settlement		accourage and a second
	, Delenaron	a ioi oxpodited			
•	Mark transka mark dag i strik	The second day of the Control Control Control of the second of	No. 4, 44 September 1992 September 1992	ĺ	
PAYABLE PENALTY					\$5,032

Screening Date 17-Jun-2008

Docket No. 2008-1024-AIR-E

PCW

Respondent The Imaging Bureau, Inc.

Case ID No. 36108

Reg. Ent. Reference No. RN100777648

Media [Statute] Air

Enf. Coordinator Thomas Jecha

FCVV

Policy Revision 2 (September 2002) PCW Revision April 29, 2008

Compliance History Worksheet

Component	Number of	nter Number Here	Adju
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	5%
en de la companya de La companya de la co	Other written NOVs	0	0%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	0	0%
Orders	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%
Judgments	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%
and Consent Decrees	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%
	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%
	Plea	se Enter Yes or No	
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
Out-Ci	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

				Adjustment	Percentage (Subtotal 2) [5%
>> Repeat Violator (Sub	total 3)		gar harraga, ang pangang ang mangang ang mga ng		Control of the Contro		7 - "Lower year year year year year year year ye
No		(8.4.77)		Adjustment	Percentage (Subtotal 3) [0%
>> Compliance History	Person Classification	(Subtotal 7)					
Average Pe	rformer			Adjustment	Percentage (Subtotal 7) [0%
>> Compliance History	Summary						
Compliance History Notes	Enhancement for one	NOV with same or similar	violations issued to t years.	the Respondent with	nin the past five	100	
			Total Adjust	ment Percentag	ge (Subtotals	s 2, 3, & 7) [5%

Screening Date		Docket No. 2008-1024-AIR-E	PCW
PROTESTS DE 2 PARESANTES ANTENERS PRESENTANTOS EN LOS ESTADOS PARESANTES.	The imaging Bureau, Inc.	Poli	ry Revision 2 (September 2002)
Case ID No. Reg. Ent. Reference No.			PCW Revision April 29, 2008
Media [Statute]			
Enf. Coordinator			
Violation Number	1		
Rule Cite(s)		6.115(c), Permit No. 47553, Special Condition Nos. 2, 11, a d Tex. Health & Safety Code § 382.085(b)	nd
		ormation on all equipment that has the potential of emitting a	ir
Violation Description		 the thermal and catalytic oxidizers were missing operating s and emission point identification numbers. 	
<u>.</u>	<u> An Albanda, paragalikan mataur</u>	<u> </u>	<u> </u>
		Base Pena	Ity \$10,000
>> Environmental, Property and	d Human Health Matr Harm	TIX	1000
Release_	Major Moderate	Minor	
OR Actual			
Potential		Percent 0%	
>>Programmatic Matrix		NE/HILLION	
Falsification	Major Moderate	Minor Percent 10%	
west and the second sec		1 ercent 1070	<u> </u>
Matrix			
Notes	100% of the	e rule requirement was not met.	
ii. San			258
A de la companya della companya della companya de la companya della companya dell		Adjustment \$9,0	00
			\$1,000
Violation Events			
Violation Events			
Number of Vio	plation Events 2	Number of violation days	
	daily		
	monthly		
mark only one with an x	quarterly semiannual -	Violation Base Pena	ity \$2,000
	annual		
	single event x		
	Two single events are r	ecommended (one event for each oxidizer).	
Good Faith Efforts to Comply	25.0%	Reduction	\$500
	Before NOV Extraordinary	NOV to EDPRP/Settlement Offer	
	Ordinary		
	N/A	(mark with x)	
	Nette		
	Notes	Compliance was achieved May 20, 2008.	
	. [2.2.3.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.	VI-1-42 - O. F.C.	64 500
Economic Panest (ED) See See	.i.Jotan	Violation Subto	tal \$1,500
Economic Benefit (EB) for this		Statutory Limit Test	
Estimated	I EB Amount	\$1 Violation Final Penalty To	al \$1,653
		This violation Final Assessed Penalty (adjusted for limit	s) \$1,653

	E	conomic l	3enefit W	orks	sheet		
Respondent	The Imaging Bu	ıreau, Inc.	er e	elitates (Vereirade)	er er var er vinderskade blev maar van de kalende stad de ke	o i i i i i i i i i i i i i i i i i i i	reserves in Charlet Cathern
Case ID No							
Reg. Ent. Reference No	/3						
Media							Years of
Violation No	D					Percent Interest	Depreciation
Violation No		151016-1-161115-15115-15115-1511			THE CONTRACTOR OF COMME	1 - 2000 200 400 - 21	099940900000000000000000000000000000000
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	1 No commas or \$						
entere in 1810 in Land. Antino de la companyo de Antonio.	Englishmenskippel er tirk (r. 13 + 64)	1 CTL CENT COUNTY GROWN AGENT AT BLUMSTON	ning in a time is the base to be and the time	MARA BESA 1751	1 Partito be a rose pagada habitan bara bara	wateries also a construction of the constructi	
Delayed Costs				JP/4800			ing Higginanis
Equipment		ation in a state and amount	ANGEL CONTRACTOR	0.00	\$0	\$0	\$0
Buildings	San San San San San	y a lista zakituaria.	and the second	0.00	\$0	\$0	\$0
Other (as needed)	THE VIET CO. THE PARTY OF THE P	(4, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,	المتعادلة المستعددة المستعدد والمتعادد المستعدد المستعدد المستعدد المستعدد المستعدد والمتعاد والمتعاد والمتعاد	0.00	\$0	\$0	. \$0
Engineering/construction	1248 1000 1000			0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System			MENGERLANDA LATER	0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$100	4-Apr-2008	20-May-2008	0.13	\$1	n/a	\$1
Notes for DELAYED costs		Date Required is	the investigation	date and	Final Date is the	the thermal and cata date of compliance.	
Avoided Costs	S ANN	IUALIZE [1] avoide	ea costs before e		Carrier and Carrie	one-time avoided o	
Disposal				0.00	\$0	\$0 *0	\$0
Personnel				0.00	\$0 60	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling	- 12 - 12 - 12 - 12 - 12 - 12 - 12 - 12	a laste or control laste	<u> </u>	0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/equipment	310 Sec. 10. 10. 10.			0.00	\$0 \$0	\$0	\$0 \$0
Financial Assurance [2]	100 C			0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs [3]	V. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.			=			
				0.00		60	
Other (as needed)				0.00	1 \$0	\$0	\$0
Other (as needed) Notes for AVOIDED costs				J 0.00	\$0	\$0	

Screening Date		Docket No. 2008-102	4-AIR-E	PCW
	The Imaging Bureau, Inc.		•	vision 2 (September 2002)
Case ID No. Reg. Ent. Reference No.			P	CW Revision April 29, 2008
Media [Statute]				
Enf. Coordinator				
Violation Number				
Rule Cite(s)		§ 115.442(1)(F)(ii) and 116.115(c), Perm 6A, and 26C and Tex. Health & Safety (
Violation Description	than 70% and store w containers. Specifically, the	lutions with a volatile organic compound raste ink, solvents, printing oil, and clear ne plant was using a cleaning solution (\$ ige containers with waste ink, solvents, particularly cloths were open.	up cloths in closed Sure Wash) with a VOC	
	i		<u> </u>	
			Base Penalty	\$10,000
>> Environmental, Property an	id Human Health Matr	ix		•
Meses	Harm			
Release OR Actual	Major Moderate	Minor		
Potential		Percent	10%	
>>Programmatic Matrix Falsification	Major Moderate	Minor		
		Percent	0%	
	727 N 197 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
Matrix Human health o	or the environment has beer	n exposed to insignificant amounts of po	llutants as a result of the	
Notes		violation.		

	Hilling on	Adjustmer	t \$9,000	•
			True de la constant d	\$1,000
Violation Events	986			
VIOLEGII LVEITS		uniosaniau en		, devite.
Number of Vi	olation Events 1	24 Number of	of violation days	
	daily	3		
	monthly			
mark only one	quarterly x		Violation Base Penalty	\$1,000
with an x	semiannual annual			
	single event	4		•
**************************************	VARIETIES STATE OF THE STATE OF			
One quarte		rom the April 4, 2008 investigation date	until compliance was	
	acı	nieved on April 28, 2008.		
C. Frith Effective Comple	25.00	V Poduotos		\$250
Good Faith Efforts to Comply	Before NOV	Reduction NOV to EDPRP/Settlement Offer		4200
	Extraordinary			
·	Ordinary			
-	N/A	(mark with x)		
	Notes	Compliance was achieved April 28, 2008	3	
-			Violation Subtotal	\$750
		<u>-</u>	***	
Economic Benefit (EB) for this	violation	Statuto ·	ry Limit Test	
Estimate	ed EB Amount	\$1] Viola	tion Final Penalty Total	\$826
***************************************		This violation Final Assessed Pena	alty (adjusted for limits)	\$826

	::::::::::::::::::::::::::::::::::::::	conomic l	Benefit W	orks	sheet		
Respondent	The Imaging B	ureau, Inc.	n ne e njestov je to joje s i vetini kanen i veti		er vragadi i ir igli i i sasitiini sibi i i	na e no no paride distinata de parte en la delim	ulikak denamat diktiraksa riber
Case ID No	. 36108						
Reg. Ent. Reference No.	. RN100777648					re to	
Media	ı Air					Percent Interest	Years of
Violation No	2					Percent interest	Depreciation
	37				754 774	5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
		Date Meduned	r mai Date	119	miterest Saveu	Olletime costs	ED AMOUNE
Item Description	No commas or \$	Market Commence of the Commenc	and the second second second	englikari Sengan sengen dan	entre de la compania	Marada	
van en van een een van een van een van de		nga ing kang ng ngapan na ing mang na ngang ng ngang ng	e programpy in a region roll a rigor agric of	gyprotydat 199	in in the graphism is a night and the althought a side.	energia proportional de la companya	
Delayed Costs	<u> </u>		a de la companya de				
Equipment	distant same		and the second second	0.00	\$0	\$0	\$0
Buildings	Make an Arch			0.00	\$0	\$0	\$0 \$0
Other (as needed)	Section 2 decision and the			0.00	\$0 \$0	\$0 \$0	\$0 \$0
Engineering/construction	managa sasarining William			0.00	\$0 \$0	n/a	\$0 \$0
Land Record Keeping System	Vertice of the same			0.00	\$0	n/a	\$0 \$0
Training/Sampling	Market Andrews			0.00	\$0	n/a	\$0 \$0
Remediation/Disposal				0.00	\$0	n/a	\$0 \$0
Permit Costs	7 ag 1 1			0.00	\$0	n/a	\$0
Other (as needed)	\$200	4-Apr-2008	28-Apr-2008	0.07	\$1	n/a	\$1
							ant of laga than
Notes for DELAYED costs	7	0%. Date Required	d is the investigation	on date a	and Final Date is t	on with a VOC content of compliant	ce.
Avoided Costs	7	0%. Date Required	d is the investigation	on date a	and Final Date is t	ne date of compliand	ce. osts)⊹∷
Avoided Costs Disposal	7	0%. Date Required	d is the investigation	on date a	and Final Date is t item (except for \$0	ne date of compliand	osts):
Avoided Costs Disposal Personnel	7	0%. Date Required	d is the investigation	on date a	and Final Date is t item (except for \$0 \$0	ne date of compliand one-time avoided of \$0 \$0	osts) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	7	0%. Date Required	d is the investigation	on date a	and Final Date is t item (except for \$0	ne date of compliand	osts):
Avoided Costs Disposal Personnel	7	0%. Date Required	d is the investigation	on date a	item (except for \$0 \$0 \$0 \$0	ne date of compliand one-time avoided of \$0 \$0 \$0	sosts) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	7	0%. Date Required	d is the investigation	entering 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c \$0 \$0 \$0 \$0 \$0	sosts) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	7	0%. Date Required	d is the investigation	entering 0.00 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	ne date of compliant one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	7	0%. Date Required	d is the investigation	entering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ne date of compliant cone-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	7	0%. Date Required	d is the investigation	entering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ne date of compliant cone-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	so \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	7	0%. Date Required	d is the investigation	entering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ne date of compliant cone-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	7	0%. Date Required	d is the investigation	entering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ne date of compliant cone-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	so \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	7	0%. Date Required	d is the investigation	entering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ne date of compliant cone-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	so \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	7	0%. Date Required	d is the investigation	entering 0.00 0.00 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ne date of compliant cone-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	so \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

	g Date 17-Jun-2008	Docket No. 2008	-1024-AIR-E	PCW
B. Ten direction was also injury as an about the rest of the angle.	ndent The Imaging Bureau, Inc.		Policy	Revision 2 (September 2002)
\$ 1-12-48-61-61-51-51-52-51-51-51-51-51-51-51-51-51-51-51-51-51-	ID No. 36108			PCW Revision April 29, 2008
Reg. Ent. Reference				
Media [St				
Ent. Coord Violation N	inator Thomas Jecha	·		
		16.115(c), Permit No. 47553, Specia	al Condition No. 9 and Tox	7
Nuic	one(s) oo rex. Admin. code § 1	Health & Safety Code § 382 085(b		
Violation Desc	the thermal oxidizer is less of the thermal oxidizer indic	of the heatset press and dryer when than 1400 degrees Fahrenheit. Sp ated it was operating at 266 and 28 to runs of the heatset press and dry	pecifically, the digital readou 19 degrees Fahrenheit durin	ıt
			Base Penait	y \$10,000
>> Environmental, Prope	erty and Human Health Matr Harm	X		
R	Release Major Moderate	Minor		·
OR	Actual	x		
, Р	otential	Perce	ent 10%	
>>Programmatic Matrix Falsific	cation Major Moderate	Minor		
		Perce	ent 0%	1 2 4 4 4 4 4 4 4 4
Matrix	h - 1th - th -			
Matrix Human Notes	health or the environment has been	exposed to insignificant amounts o violation.	r pollutants as a result of th	e
			. 34 . 2 March - 18	· · · · · · · · · · · · · · · · · · ·
			***************************************	_
		Adjusti	ment \$9,00	<u>u</u>
				\$1,000
v				**
Violation Events	8			A Charleston .
Numb	per of Violation Events	2 Numb	per of violation days	
	daily			
	monthly			v \$1,000
mark or with a			Violation Base Penalt	y\$1,000
	annual			
	single event		•	
		-		· =1
One	quarterly event is recommended fro	om the April 4, 2008 investigation da	ate until compliance was	
	act	nieved on May 7, 2008		
[2.30		Sandana a specification of the 1997 Sec. 255, Sec. 1997 Sec. 255, Sec. 1997		2
Good Faith Efforts to Co		Reduction		\$250
	Before NOV Extraordinary	NOV to EDPRP/Settlement Offer		
	- 132-25 up 1			
	Ordinary x N/A	(mark with x)		
		Bruery Airty)	777 5 7 7 8 P 7 1 E 1 F 1 F 1 F 1 F 1 F 1 F 1 F 1 F 1 F	
	Notes	Compliance was achieved May 7, 20)08:	
	_		, m	
			Violation Subtota	il \$750
Economic Benefit (EB) fo	or this violation	Stati	utory Limit Test	191
Es .	stimated EB Amount	\$1] Vi	olation Final Penalty Tota	ll \$826
		This violation Final Assessed P	enalty (adjusted for limits) \$826

Media	§					Percent Interest	Years of Depreciation
Violation No.	(3					5.0	CARROLLIA COMO ESTA COMO
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	L	1 EB Amount
Item Description		Date Required	rmai Date		interest ouveu	Oneume dosts	ED AMOUNE
nem pescipio:	No commas or g			E-A. 16-01-16-17-18-17			
Delayed Costs					Laste and Edition		
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction			Nagari a Lisa Ya	0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$150	4-Apr-2008	7-May-2008	0,09	\$1	n/a	\$1
Notes to BELLMED and	Estimated	cost to install a rela	y to prevent oper	ation of t	he heatset press	and dryer. Date Rec	uired is the
Notes for DELAYED costs Avoided Costs		investi	gation date and F	nal Date	is the date of con	one-time avoided c	osts)
Avoided Costs		investi	gation date and F	nal Date	is the date of con item (except for \$0	npliance. one-time avoided c	osts) \$0
Avoided Costs Disposal Personnel		investi	gation date and F	nal Date	is the date of con item (except for \$0 \$0	one-time avoided c \$0 \$0	osts) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling		investi	gation date and F	ntering 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0	one-time avoided c \$0 \$0 \$0 \$0	sosts) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment		investi	gation date and F	ntering 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0	one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0	sosts) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]		investi	gation date and F	nal Date Intering 0.00 0.00 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment		investi	gation date and F	ntering 0.00 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0 \$0	one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0	sosts) \$0 \$0 \$0 \$0

Screening Date			Docket No. 2008-1	024-AIR-E	PCW
Respondent Case ID No.	The Imaging Bureau, Inc.			Policy	Revision 2 (September 2002)
Reg. Ent. Reference No.					PCW Revision April 29, 2008
Media [Statute]					
Enf. Coordinator					
Violation Number	4				
Rule Cite(s)	30 Tex. Admin. Code § 1 and 22	16.115(c), Per 2 and Tex. Hea	mit No. 47553, Special (lth & Safety Code § 382	Condition Nos. 12, 13, 18, .085(b)	
					1
Violation Description	visual inspections of the th	nermal oxidizer	. Specifically, temperate and audio, visual, and were not being perform	ure checks and monthly olfactory inspections of the ed.	e
			<u></u>		
					-
The second secon				Base Penalt	y\$10,000
>> Environmental, Property and	d Human Health Mat	rix			
Release	Harm Major Moderate				THE PARTY OF THE P
OR Actual	Alesaissa layasta				
Potential		×	Percen	t 5%	
>>Programmatic Matrix					
Falsification	Major Moderate	Minor			
Mari Cara Cara			Percen	t 0%	
		Apple Natio			· .
Matrix Human health o	r the environment could be	e exposed to in violation		ollutants as a result of the	×
					_
			Adjustme	ent \$9,500]
					\$500
vert eller og					
Violation Events	Let - F	.	[10][2]		
Number of Vio	lation Events 2		58 Number	of violation days	
	daily				
mark only one	monthly quarterly			Violation Base Penalty	\$1,000
with an x	semiannual			Violation base renaity	41,000
	annual				
l l	single event x			•	
			12 m 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1		1
	Two single events are	recommended	(one event for each oxid	dizer).	
		- 44.000			
Good Faith Efforts to Comply	25.0%	6 Reduction			\$250
Coou rata chores to Compri	Before NOV	- Contract C	P/Settlement Offer	310	\$250
E	Extraordinary	6 X X X X X X X X X X X X X X X X X X X	75.55 (1943) - N. (1943) 75.55 (1943) - N. (1943)		
	Ordinary x				
	N/A	(mark with x)	3		
	Notes C	ompliance was	achieved on June 1, 20	008	
	Land Andrews	<u> </u>		Violation Subtotal	\$750
	•				Ţ. 50
Economic Benefit (EB) for this	violation		Statut	ory Limit Test	
Estimated	EB Amount	\$200	Viol	ation Final Penalty Total	\$826
	-	This 1-1-1		•	
		inis violati	un rinai Assessed Pen	alty (adjusted for limits)	\$826

Case ID No.	The Imaging Bu 36108	ıreau, İnc.					
Reg. Ent. Reference No. Media Violation No.	Air			•		Percent Interest	Years of Depreciation
Violation No.						5.0	15
erer en de la companya de la company La companya de la co	Item Cost	Date Required	Final Date	Yrs	Interest Saved	, , , , , , , , , , , , , , , , , , , 	EB Amount
Item Description	No commas or \$						
Delayed Costs						Ni dalamatan da	one of the second
Equipment	Transport Care		The state of the s	0.00	\$0	\$0	\$0
Buildings	Charles of Artist Control			0.00	\$0	\$0	\$0
Other (as needed)		Paris transfer two tables are referenced to the paris transfer to the paris to the		0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	1517/24			0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0
,							
Notes for DELAYED costs							
Notes for DELAYED costs Avoided Costs	ANN		d costs before	entering	item (except for	one-time avoided c	osts)
nganganag magawagang ini arawagan dagamang ang Aga tao Ab (50%)	ANN		ed costs before	0.00	\$0	\$0	\$0
Avoided Costs		UALIZE [1] avoide	2141 (National Conference of the Conference o	0.00	\$0 \$0	\$0 \$0	\$0 \$0
Avoided Costs Disposal	\$1,200		ed costs before 1-Jun-2008	0.00 0.00 0.16	\$0 \$0 \$10	\$0 \$0 \$191	\$0 \$0 \$200
Avoided Costs Disposal Personnel		UALIZE [1] avoide	2141 (National Conference of the Conference o	0.00 0.00 0.16 0.00	\$0 \$0 \$10 \$0	\$0 \$0 \$191 \$0	\$0 \$0 \$200 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]		UALIZE [1] avoide	2141 (National Conference of the Conference o	0.00 0.00 0.16 0.00 0.00	\$0 \$0 \$10 \$0 \$0	\$0 \$0 \$191 \$0 \$0	\$0 \$0 \$200 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]		UALIZE [1] avoide	2141 (National Conference of the Conference o	0.00 0.00 0.16 0.00 0.00 0.00	\$0 \$0 \$10 \$0 \$0 \$0	\$0 \$0 \$191 \$0 \$0 \$0	\$0 \$0 \$200 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]		UALIZE [1] avoide	2141 (National Conference of the Conference o	0.00 0.00 0.16 0.00 0.00	\$0 \$0 \$10 \$0 \$0	\$0 \$0 \$191 \$0 \$0	\$0 \$0 \$200 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	\$1,200	IUALIZE [1] avoide 4-Apr-2008 nual cost to perform	1-Jun-2008	0.00 0.00 0.16 0.00 0.00 0.00 0.00	\$0 \$0 \$10 \$0 \$0 \$0 \$0	\$0 \$0 \$191 \$0 \$0 \$0 \$0	\$0 \$0 \$200 \$0 \$0 \$0 \$0

Screening Date	17-Jun-2008 The Imaging Bureau, Inc.	Docket No. 2008-1024-AIR-E		PCW
Case ID No.				Revision 2 (September 2002) PCW Revision April 29, 2008
Reg. Ent. Reference No.	?			revi Revision April 29, 2006
Media [Statute]				
Enf. Coordinator Violation Number				
Rule Cite(s)	5 So Tex. Admin. Code 88 1	115.446(1) and 116.115(c), Permit No. 47553, Spec	ial Condition	7
	Nos. 10 and	d 20 and Tex. Health & Safety Code § 382.085(b)	iai Condition	
**************************************	Failed to equip the catalyt	ic oxidizer with a continuous temperature recorder a	ınd calibrate	
Walatian Danasiatian	the thermal oxidizer of continuously record temper	continuous temperature recorder. Specifically, a mo rature was not installed on the catalytic oxidizer and	nitor to	
Violation Description	oxidizer recorder chart ind	icated a temperature of 250 degrees Fahrenheit dur	ing two runs	
	when the digital reado	ut showed it was actually operating at 266 and 289 Fahrenheit.	degrees	
-	Lad Akada A ^{MA} da a a a ad			<u>1</u>
		. Е	Base Penalty	\$10,000
>> Environmental, Property an	d Human Health Matr	ix		
Release	Harm Maios Madarata	M	885	
OR Actual	Major Moderate	Minor		
Potential		X Percent 59	6	
>>Programmatic Matrix			_	
Falsification	Major Moderate	Minor		
222.2.2.2		Percent 0%	6	
#6888.100490000000			La an in an una sgangana	7
	or the environment could be	exposed to insignificant amounts of pollutants as a	result of the	
Notes		violation.		
788				
		Adjustment ·	\$9,500	<u>.</u>
				\$500
Violation Events		Sair and Annual Control		
Number of Vic	olation Events	Number of violation d	ays	
	daily			
	monthly			
mark only one with an x	quarterly semiannuai	Violation B	ase Penalty	\$1,000
	annual			
	single event x			
	Two single events ar	e recommended (one for each oxidizer).		
Good Faith Efforts to Comply	25.0%	Reduction		\$250
	Before NOV Extraordinary	NOV to EDPRP/Settlement Offer		·
· .	Ordinary			
	N/A	(mark with x)		
			1	
	Notes Co	ompliance was achieved on May 7, 2008.		
			1	
		Violatio	on Subtotal	\$750
Economic Benefit (EB) for this	violation	Statutory Limit T	est	
Catimatad	EB Amount			
Esunated	LD AMOUNT	\$5 Violation Final Pe	naity I otal	\$826
		This violation Final Assessed Penalty (adjusted	for limits)	\$826

Docnondont	- Particular design propagativa and a consist	British Addison Company of the Control	3enefit W	OIKS	orieer		
	The Imaging Bu	reau, Inc.					
Case ID No.	1						
Reg. Ent. Reference No.	14					Lazar en	NZ
Media	7					Percent Interest	Years of
Violation No.	3 5	and the second second section of the second			and the second s		Depreciation
		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		1114		5.0	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or S						
The contract of the contract o		for the contract of the contra	ergelik gesemmen gerlen sildt et sil in direnterekte Pridliksek set distributet i	h:Acirno.coacoach	, post, a. s. c. a. a. lug. sako a ki dosa a ki lub a ka ki lu	99966947 - 14 1. 6. 6. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	
Delayed Costs			*				
Equipment				0.00	\$0	\$0,	
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	Caraller and agent			0.00	\$0	\$0	\$0
Engineering/construction	(2) - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -			0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System		N. C	water and the second	0.00	\$0	n/a	\$0 ***
Training/Sampling				0.00	\$0	n/a	\$0.
Remediation/Disposal				0.00	\$0	n/a n/a	\$0 •••
Permit Costs				0.00	\$0	n/a n/a	\$0 \$5
Other (as needed)	\$1,000	4-Apr-2008_	7-May-2008	0.09	\$ 5	illa i	Φ υ
·	Estimated cos	t to install the catal	ytic oxidizer recor	der and o	calibrate the therm	nal oxidizer recorder.	Date Require
Notes for DELAYED costs Avoided Costs Disposal Personnel		is the inves	tigation date and	entering 0.00 0.00	item (except for \$0 \$0	one-time avoided c	osts) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling		is the inves	tigation date and	entering 0.00 0.00 0.00	item (except for \$0 \$0 \$0 \$0	one-time avoided of \$0 \$0 \$0 \$0	osts) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment		is the inves	tigation date and	entering 0.00 0.00 0.00 0.00	Date is the date of	one-time avoided of \$0 \$0 \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]		is the inves	tigation date and	entering 0.00 0.00 0.00 0.00 0.00 0.00	Date is the date of	one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]		is the inves	tigation date and	entering 0.00 0.00 0.00 0.00 0.00 0.00	Date is the date of	one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]		is the inves	tigation date and	entering 0.00 0.00 0.00 0.00 0.00 0.00	Date is the date of	one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)		is the inves	tigation date and	entering 0.00 0.00 0.00 0.00 0.00 0.00	Date is the date of	one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]		is the inves	tigation date and	entering 0.00 0.00 0.00 0.00 0.00 0.00	Date is the date of	one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date		D	ocket No. 2008-102	24-AIR-E	PCW
	The Imaging Bureau, Inc.	•		Policy !	Revision 2 (September 2002)
Case ID No.					PCW Revision April 29, 2008
Reg. Ent. Reference No. Media [Statute]					
Enf. Coordinator					
Violation Number	6	•			
Rule Cite(s)	30 Tex. Admin. Code §§ 1				7
	Nos. 25C, D,	and I and Tex. H	ealth & Safety Code §	382.085(b)	_
Violation Description	Falled to maintain comp calculations of rolling 12 (month emissions	ecifically, thermal oxidiz s totals for VOC and ha found in the records.	er efficiency data and izardous air pollutants	
				Base Penalty	\$10,000
					470,000
>> Environmental, Property and	d Human Health Matr Harm	ix 📗		196	
Release	Major Moderate	Minor			
OR Actual					
Potential		a XVIII danak eti	Percent	0%	
>>Programmatic Matrix					
Falsification	Major Moderate	Minor			
		×	Percent	1%	
					_
Matrix					
Notes Less	than 30% of the rule requi	rement (three out	of 12 required items) v	vas not met.	
s Le trice auzer est c	K. A. A. B.	275 8888			
			Adiostros	\$0.000	- 1
			Adjustmen	t \$9,900	
					\$100
Violation Events					•
Description of the second seco	·				ing.
Number of Vio	lation Events 3		34 Number o	f violation days	
	doll.	1			
	daily monthly			1	
mark only one	quarterly		•	Violation Base Penalty	\$300
with an x	semiannual				
	annual				
I.	single event x	<u> </u> -	4.6		
					1
Three si	ngle events are recommen	ded (one event fo	or each type of record n	ot maintained).	
Good Faith Efforts to Comply	0 c 00/]			-
Good Father Enorth to Comply	Before NOV	Reduction NOV to EDPRP/Se	ttlement Offer		\$75
	xtraordinary				
	Ordinary x		8465047 1747 77 17487 1747 184		
	N/A	(mark with x)			
·					
	Notes Co	ompliance was ac	chieved on May 8, 2008		
	Kalanda Akasah				- 1
				Violation Subtotal	\$225
Fooponia Powers/FDV 5-41+					
Economic Benefit (EB) for this	พบเสมบิป		Statutor	y Limit Test	
Estimated	EB Amount	\$1	Violati	on Final Penalty Total	\$248
		This violetie : *			
		THIS VIOLATION !	mai Assessed Penal	ty (adjusted for limits)	\$248

	, 36108						
Reg. Ent. Reference No Media Violation No	ı Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	1 No commas or \$				den a caracter de la compansión	Shaker No.	
Delayed Costs	\$			27.00	Commence of the Commence of th		
Equipment				0.00	\$0	\$0	\$0
Buildings	A Wards at the same of the	*** *** *** *** *** *** *** *** *** **		0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction	Alleway,			0.00	\$0	\$0	\$0
Land -	4.2.1.2			0.00	\$0	n/a	\$0
Record Keeping System	\$150	4-Apr-2008	8-May-2008	0.09	\$1	in/a	\$1
Training/Sampling	17.19.			0.00	\$0	n/a	\$0
Remediation/Disposal	Subject to the second			0.00	\$0	n/a	\$0.
Permit Costs	Since Plant			0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
	Estimated c	ost to calculate and	keep records of \	VOC and	HAP rolling 12 m	onth emissions total	s and thermal
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Screening Date 17-Jun-2008 Docket No. 2008-1024-AIR-E	PCW
	Revision 2 (September 2002)
Case ID No. 36108 Reg. Ent. Reference No. RN100777648	PCW Revision April 29, 2008
Media [Statute] Air	
Enf. Coordinator Thomas Jecha	
Violation Number 7	•
Rule Cite(s) 30 Tex. Admin. Code § 116.115(c); Permit No. 47553, Special Condition No. 24C(1) and Tex. Health & Safety Code § 382.085(b)	
Violation Description Failed to submit proposed sampling methods within 30 days after the printing press, dryer, and the catalytic oxidizer reaches normal operating conditions. Specifically, emissions sampling methods should have been submitted by March 20, 2008 since the printing press associated with the catalytic oxidizer began its first commercial run on February 20, 2008.	
Base Penalty	\$10,000
>> Environmental, Property and Human Health Matrix Harm	
Release Major Moderate Minor	
OR Actual	
Potential Percent 0%	
>>Programmatic Matrix	
Falsification Major Moderate Minor Percent 10%	
Felcent 1076	
Matrix Notes 100% of the rule requirement was not met.	
Adjustment \$9,000	
	64.000
	\$1,000
Violation Events	
Number of violation days	
daily	•
monthly Violation Base Penalty Violation Base Penalty	\$1,000
with an x semiannual	
annual Circle Control	
single event X	
One single event is recommended.	
Good Faith Efforts to Comply Before NOV NOV to EDPRP/Settlement Offer	\$0
Extraordinary	
Ordinary	
N/A x ⅓ (mark with x)	
Notes The Respondent does not meet the good faith criteria for this violation.	
Violation Subtotal	\$1,000
Economic Benefit (EB) for this violation Statutory Limit Test	
Estimated EB Amount \$7 Violation Final Penalty Total	\$1,084
This violation Final Assessed Penalty (adjusted for limits)	\$1,084

	475 24 27 24 10	conomic l	Benefit W	'orks	sheet		
Respondent Case ID No.	The Imaging Bu	AND DESCRIPTION OF THE PROPERTY OF THE PARTY	(1999-1994), 1883-1994 (1994), 1994-1994 (1994)	: 3124 PE - 1753.	eritationista ona propieta esperado (n. 156) 1	od i i stranu i odenicijam i dan odenici semija	amazi da
Reg. Ent. Reference No. Media	i i					Percent Interest	Years of
Violation No.	7					reident interest	Depreciation
						5.0	. 18
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$	Santah santangan sa masa manah manah sa ma		Section Consessed	Specific Control of the Control of t	Sec. 90740 4	
D. F. Village				Series and			
Delayed Costs Equipment				0.00	\$0	l \$0l	. \$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)	100			0.00	\$0	\$0	\$0
Engineering/construction	775 111 772 7		3 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	0.00	\$0	\$0	\$0
Land		AND THE WORLD		0.00	\$0	n/a	\$0
Record Keeping System			21.14.24.24.1.1.1.1.1.1.1.1.1.1.1.1.1.1.	0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal		Cooperation 5		0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$150	20-Mar-2008	10-Feb-2009	0.90	\$7	n/a	\$7
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Compliance History

Customer/Respondent/Owner-Operator:

CN600463830

The Imaging Bureau, Inc.

Classification: AVERAGE

Rating: 15.00

Regulated Entity:

RN100777648

THE IMAGING BUREAU

Classification: AVERAGE

Site Rating:15.00

ID Number(s):

AIR NEW SOURCE PERMITS

PERMIT

47553

Location:

AIR NEW SOURCE PERMITS

ACCOUNT NUMBER

TA4116R

4545 CAMBRIDGE RD, FORT WORTH, TX, 76155

Rating Date: September 01 07 Repeat Violator: NO

TCEQ Region:

REGION 04 - DFW METROPLEX

Date Compliance History Prepai

June 16, 2008

Agency Decision Requiring Compliance

Enforcement

Compliance Period:

June 13, 2003 to June 13, 2008

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

Name:

Thomas Jecha

Phone:

512 239 2576

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period?

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:

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

B. Any criminal convictions of the state of Texas and the federal government.

N/A

Chronic excessive emissions events. C.

D. The approval dates of investigations. (CCEDS Inv. Track. No.)

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

Date: 10/19/2004

(334661)

Self Report?

Classification:

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

Ramt Prov:

PERMIT Special Condition 7. F.

Description:

Continuous temperature monitor recordings from the oxidizer.

At the time of the inspection, the temperature recording device (chart recorder)

was not operative at the time of the inspection.

Continuous temperature monitor recordings from the oxidizer.

Self Report?

NO

Classification:

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov:

PERMIT Special Condition 8. C.

Description:

Sponges, cloths, or towels that have been used for cleaning shall be temporarily

stored in covered containers located adjacent to the presses and transferred

regularly to sealed containers for cleaning or disposal.

At the time of the inspection, the containers located adjacent to the presses for

the storag

Self Report? NO Classification:

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

Ramt Prov:

PERMIT Special Condition 11.

Description:

The heatset press and dryer shall immediately cease operation if the associated

thermal oxidizer is not operating properly.

Self Report?

NO

Classification

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116,115(c)

Rqmt Prov:

PERMIT Special Condition 11

Description:

A temperature monitor shall be installed, calibrated, and maintained to continuously measure and record the temperature of the combustion chamber of the thermal oxidizer. The monitor shall measure the gas temperature at the outlet of the oxidizer. The temperature of the combustion chamber shall be at

least 1400 degre

Self Report?

NO

Classification

Moderate

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N. 44, 7 . 318 45

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

Ramt Prov:

PERMIT Special Condition 15.

Description:

The temperature of the oxidizer shall be verified by an authorized person at

least twice per eight hour shift.

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



§	BEFORE THE
§	
§	TEXAS COMMISSION ON
§	
§	ENVIRONMENTAL QUALITY
	<i>\$\tau\$</i>

AGREED ORDER DOCKET NO. 2008-1024-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 The Imaging Bureau, Inc. ("the Respondent") 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 the Respondent appear before the Commission and together stipulate that:

- 1. The Respondent owns and operates a commercial printing business at 4545 Cambridge Road in Fort Worth, Tarrant 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 the Respondent agree that the Commission has jurisdiction to enter this Agreed Order, and that the Respondent is subject to the Commission's jurisdiction.
- 4. The Respondent received notice of the violations alleged in Section II ("Allegations") on or about June 7, 2008.
- 5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
- 6. An administrative penalty in the amount of Six Thousand Two Hundred Ninety Dollars (\$6,290) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent has paid Four Hundred Twenty-Three Dollars (\$423) of the administrative penalty and One Thousand Two Hundred Fifty-Eight Dollars (\$1,258) is deferred

contingent upon the Respondent'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 the Respondent fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require the Respondent to pay all or part of the deferred penalty.

The remaining amount of Four Thousand Six Hundred Nine Dollars (\$4,609) of the administrative penalty shall be payable in 11 monthly payments of Four Hundred Nineteen Dollars (\$419) 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 the Respondent 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 the Respondent to meet the payment schedule of this Agreed Order constitutes the failure by the Respondent 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 the Respondent 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 the Respondent has implemented the following corrective measures at the Plant, as documented by information received from the Respondent on June 20, 2008:
 - a. Posted operating instructions and identification numbers on the thermal and catalytic oxidizers by May 20, 2008;
 - b. Closed waste containers and switched to a cleaning solution with a volatile organic compound ("VOC") content of less than 70% by April 28, 2008;
 - c. Installed a relay to prevent operation of the heatset press and dryer by May 7, 2008;
 - d. Began performing required inspections of the oxidizers by June 1, 2008;
 - e. Installed the catalytic oxidizer recorder and calibrated the thermal oxidizer recorder by May 7, 2008; and
 - f. Added VOC and hazardous air pollutant ("HAP") rolling 12 month emissions totals and thermal oxidizer efficiency data to the records by May 8, 2008.
- 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 the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.

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- 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, the Respondent is alleged to have:

- 1. Failed to post required information on all equipment, in violation of 30 TEX. ADMIN. CODE § 116.115(c), Permit No. 47553, Special Condition Nos. 2, 11, and 15 and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on April 4, 2008. Specifically, the thermal and catalytic oxidizers were missing operating manuals and emission point identification numbers.
- 2. Failed to use cleaning solutions with a VOC content of less than 70% and store waste ink, solvents, printing oil, and cleanup cloths in closed containers, in violation of 30 Tex. ADMIN. CODE §§ 115.442(1)(F)(ii) and 116.115(c), Permit No. 47553, Special Condition Nos. 5B, 26A, and 26C and Tex. Health & Safety Code § 382.085(b), as documented during an investigation conducted on April 4, 2008. Specifically, the Plant used a cleaning solution (Sure Wash) with a 100% VOC content and storage containers of waste ink, solvents, printing oil, and cleanup cloths were open.
- 3. Failed to cease operation of the heatset press and dryer when the combustion chamber of the thermal oxidizer is less than 1400 degrees Fahrenheit, in violation of 30 Tex. ADMIN. CODE § 116.115(c), Permit No. 47553, Special Condition No. 9 and Tex. Health & Safety Code § 382.085(b), as documented during an investigation conducted on April 4, 2008. Specifically, the digital readout of the thermal oxidizer indicated it was operating at 266 and 289 degrees Fahrenheit during two runs of the heatset press and dryer.
- 4. Failed to perform required inspections, in violation of 30 TEX. ADMIN. CODE § 116.115(c), Permit No. 47553, Special Condition Nos. 12, 13, 18, and 22 and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on April 4, 2008. Specifically, temperature checks and monthly visual inspections of the thermal oxidizer and audio, visual, and olfactory inspections of the catalytic oxidizer, were not being performed.
- 5. Failed to equip the catalytic oxidizer with a continuous temperature recorder and calibrate the thermal oxidizer continuous temperature recorder, in violation of 30 Tex. ADMIN. CODE §§ 115.446(1) and 116.115(c), Permit No. 47553, Special Condition Nos. 10 and 20 and Tex. Health & Safety Code § 382.085(b), as documented during an investigation conducted on April 4, 2008. Specifically, a monitor to continuously record temperature was not installed on the catalytic oxidizer and the thermal oxidizer recorder chart indicated a temperature of 250 degrees Fahrenheit during two runs when the digital readout showed it was actually operating at 266 and 289 degrees Fahrenheit.
- 6. Failed to maintain complete records, in violation of 30 TEX. ADMIN. CODE §§ 115.446(7) and 116.115(c), Permit No. 47553, Special Condition Nos. 25C, D, and I and TEX. HEALTH & SAFETY

The Imaging Bureau, Inc. DOCKET NO. 2008-1024-AIR-E Page 4

CODE § 382.085(b), as documented during an investigation conducted on April 4, 2008. Specifically, thermal oxidizer efficiency data and calculations of rolling 12 month emissions totals for VOCs and HAPs were not found in the records.

7. Failed to submit proposed sampling methods within 30 days after the printing press, dryer, and the catalytic oxidizer reaches normal operating conditions, in violation of 30 Tex. ADMIN. CODE § 116.115(c), Permit No. 47553, Special Condition No. 24C(1) and Tex. Health & Safety CODE § 382.085(b), as documented during an investigation conducted on April 4, 2008. Specifically, emissions sampling methods should have been submitted by March 20, 2008 since the printing press associated with the catalytic oxidizer began its first commercial run on February 20, 2008.

III. DENIALS

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

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the Respondent pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and the Respondent'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: The Imaging Bureau, Inc., Docket No. 2008-1024-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. It is further ordered that the Respondent shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Agreed Order, submit proposed methods to accomplish emissions sampling for the dryer and catalytic oxidizer in accordance with Permit No. 47553, Special Condition No. 24C(1); and
 - b. Within 45 days after the effective date of this Agreed Order, submit written certification as described below, and include detailed supporting documentation to demonstrate compliance with Ordering Provision No. 2.a. The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly

The Imaging Bureau, Inc. DOCKET NO. 2008-1024-AIR-E Page 5

responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team Enforcement Division, MC 149A Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

with a copy to:

Air Section, Manager Dallas/Fort Worth Regional Office Texas Commission on Environmental Quality 2309 Gravel Drive Fort Worth, Texas 76118-6951

- 3. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Plant operations referenced in this Agreed Order.
- 4. If the Respondent 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, the Respondent's failure to comply is not a violation of this Agreed Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent 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 the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
- 6. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent 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.

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The Imaging Bureau, Inc. DOCKET NO. 2008-1024-AIR-E Page 6

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

The Imaging Burcau, Inc. DOCKET NO. 2008-1024-ATR-E Page 7

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	:			
For the Executive Director		Date	1/21/2009	_

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of this entity indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCBO, 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 Atturney General's Office of any future enforcement actions; and
- TCEQ secking other relief as authorized by law.

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

Date President Signature

Name (Printed or typed) Authorized Representative of

Instructions: Send the original, signed Agreed Order with penalty payment to the Pinancial Administrative Division, Reven Section at the address in Section IV, Paragraph I of this Agreed Order.

The Imaging Bureau, Inc.

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