

EXECUTIVE SUMMARY - ENFORCEMENT MATTER Page 1 of 2
DOCKET NO.: 2008-1604-AIR-E **TCEQ ID:** RN100220359 **CASE NO.:** 36642
RESPONDENT NAME: University of Texas at El Paso

ORDER TYPE:		
<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	
CASE TYPE:		
<input checked="" 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 type="checkbox"/> DRY CLEANER REGISTRATION
<p>SITE WHERE VIOLATION(S) OCCURRED: University of Texas at El Paso, 3120 Sun Bowl Drive, El Paso, El Paso County</p> <p>TYPE OF OPERATION: Fleet fueling facility</p> <p>SMALL BUSINESS: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>OTHER SIGNIFICANT MATTERS: There are no complaints. There is no record of additional pending enforcement actions regarding this facility location.</p> <p>INTERESTED PARTIES: No one other than the ED and the Respondent has expressed an interest in this matter.</p> <p>COMMENTS RECEIVED: The <i>Texas Register</i> comment period expired on March 16, 2009. No comments were received.</p> <p>CONTACTS AND MAILING LIST: TCEQ Attorney/SEP Coordinator: None TCEQ Enforcement Coordinator: Ms. Roshondra Lowe, Enforcement Division, Enforcement Team 5, MC R-12, (713) 767-3553; Ms. Cari-Michel La Caille, Enforcement Division, MC 219, (512) 239-1387 Respondent: Mr. Robert D. Moss, Assistant Vice President for EH&S, University of Texas at El Paso, 3120 Sun Bowl Drive, El Paso, Texas 79902 Respondent's Attorney: Not represented by counsel on this enforcement matter</p>		

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>Type of Investigation: <input type="checkbox"/> Complaint <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Enforcement Follow-up <input type="checkbox"/> Records Review</p> <p>Date(s) of Complaints Relating to this Case: None</p> <p>Date of Investigation Relating to this Case: August 11, 2008</p> <p>Date of NOV/NOE Relating to this Case: September 3, 2008 (NOE)</p> <p>Background Facts: This was a routine investigation.</p> <p>AIR</p> <p>Failure to comply with the 7.0 pounds per square inch absolute ("psia") maximum RVP requirement for unleaded gasoline transferred during the period of June 1, 2008 through September 16, 2008. Specifically, gasoline samples taken from Pump No. 1 on August 11, 2008 were 7.7 psia which exceeded the 7.0 psia maximum RVP requirement. [30 TEX. ADMIN. CODE § 115.252(2) and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p>	<p>Total Assessed: \$770</p> <p>Total Deferred: \$154 <input checked="" type="checkbox"/> Expedited Settlement <input type="checkbox"/> Financial Inability to Pay</p> <p>SEP Conditional Offset: \$0</p> <p>Total Paid to General Revenue: \$616</p> <p>Site Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Major Source: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Applicable Penalty Policy: September 2002</p>	<p>Corrective Actions Taken:</p> <p>The Executive Director recognizes that the Respondent received a fuel shipment, collected samples, and received results on August 29, 2008 demonstrating compliance with the RVP requirement.</p>

Additional ID No(s): Air EE1045O



Policy Revision 2 (September 2002)

Penalty Calculation Worksheet (PCW)

PCW Revision June 12, 2008

DATES	Assigned	9-Sep-2008	Screening	6-Oct-2008	EPA Due	
	PCW	17-Oct-2008				

RESPONDENT/FACILITY INFORMATION	
Respondent	University of Texas at El Paso
Reg. Ent. Ref. No.	RN100220359
Facility/Site Region	6-El Paso
Major/Minor Source	Minor

CASE INFORMATION			
Enf./Case ID No.	36642	No. of Violations	1
Docket No.	2008-1604-AIR-E	Order Type	1660
Media Program(s)	Air	Government/Non-Profit	Yes
Multi-Media		Enf. Coordinator	Roshondra Lowe
		EC's Team	Enforcement Team 5
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$10,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$1,000
ADJUSTMENTS (+/-) TO SUBTOTAL 1		
Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.		
Compliance History	2.0% Enhancement	Subtotals 2, 3, & 7 \$20
Notes	Penalty enhanced due to one NOV for an unrelated issue.	
Culpability	No 0.0% Enhancement	Subtotal 4 \$0
Notes	The Respondent does not meet the culpability criteria.	
Good Faith Effort to Comply Total Adjustments		Subtotal 5 \$250
Economic Benefit	0.0% Enhancement*	Subtotal 6 \$0
Total EB Amounts	\$2	*Capped at the Total EB \$ Amount
Approx. Cost of Compliance	\$800	
SUM OF SUBTOTALS 1-7	Final Subtotal	\$770
OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment
Reduces or enhances the Final Subtotal by the indicated percentage.		
Notes		
	Final Penalty Amount	\$770
STATUTORY LIMIT ADJUSTMENT		Final Assessed Penalty \$770
DEFERRAL	20.0% Reduction	Adjustment -\$154
Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)		
Notes	Deferral offered for expedited settlement.	
PAYABLE PENALTY		\$616

Screening Date 6-Oct-2008

Docket No. 2008-1604-AIR-E

PCW

Respondent University of Texas at El Paso

Policy Revision 2 (September 2002)

Case ID No. 36642

PCW Revision June 12, 2008

Reg. Ent. Reference No. RN100220359

Media [Statute] Air

Enf. Coordinator Roshondra Lowe

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	1	2%
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 submitted)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%

Please Enter Yes or No

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

Adjustment Percentage (Subtotal 2) 2%

>> 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

Penalty enhanced due to one NOV for an unrelated issue.

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

Screening Date 6-Oct-2008	Docket No. 2008-1604-AIR-E	PCW		
Respondent University of Texas at El Paso		<small>Policy Revision 2 (September 2002)</small>		
Case ID No. 36642		<small>PCW Revision June 12, 2008</small>		
Reg. Ent. Reference No. RN100220359				
Media [Statute] Air				
Enf. Coordinator Roshondra Lowe				
Violation Number	1			
Rule Cite(s)	30 Tex. Admin. Code § 115.252(2) and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to comply with the 7.0 pounds per square inch absolute ("psia") maximum RVP requirement for unleaded gasoline transferred during the period of June 1, 2008 through September 16, 2008. Specifically, gasoline samples taken from Pump No. 1 on August-11, 2008 were 7.7 psia which exceeded the 7.0 psia maximum RVP requirement.			
	Base Penalty	\$10,000		
>> Environmental, Property and Human Health Matrix				
OR	Release	Harm		
		Major Moderate Minor		
	Actual	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		
	Potential	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		
		Percent	10%	
>> Programmatic Matrix				
	Falsification	Major	Moderate	Minor
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				Percent
				0%
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of this violation.			
	Adjustment	\$9,000		
			\$1,000	
Violation Events				
	Number of Violation Events	1	Number of violation days	
		18		
	<small>mark only one with an x</small>	daily	<input type="checkbox"/>	
		monthly	<input type="checkbox"/>	
		quarterly	<input type="checkbox"/>	
		semiannual	<input type="checkbox"/>	
		annual	<input type="checkbox"/>	
		single event	<input checked="" type="checkbox"/>	
			Violation Base Penalty	
			\$1,000	
One single event is recommended.				
Good Faith Efforts to Comply			25.0% Reduction	
			\$250	
	Extraordinary	Before NOV	NOV to EDPRP/Settlement Offer	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Ordinary	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	N/A	<input type="checkbox"/>	(mark with x)	
Notes	The Respondent completed corrective actions on August 29, 2008.			
		Violation Subtotal	\$750	
Economic Benefit (EB) for this violation		Statutory Limit Test		
	Estimated EB Amount	\$2	Violation Final Penalty Total	
			\$770	
		This violation Final Assessed Penalty (adjusted for limits)	\$770	

Economic Benefit Worksheet

Respondent University of Texas at El Paso
Case ID No. 36642
Reg. Ent. Reference No. RN100220359
Media Air
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

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

Delayed Costs

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				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				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)	\$800	11-Aug-2008	29-Aug-2008	0.05	\$2	n/a	\$2

Notes for DELAYED costs

Estimated cost of implementing procedures to ensure the required RVP is maintained. Date required is the investigation date. Final date is the date corrective actions were completed.

Avoided Costs

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

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$800

TOTAL

\$2

Compliance History Report

Customer/Respondent/Owner-Operator: CN600130611 University of Texas at El Paso Classification: AVERAGE Rating: 2.13
 Regulated Entity: RN100220359 UTEP PHYSICAL PLANT Classification: AVERAGE Site Rating: 0.75
 ID Number(s): INDUSTRIAL AND HAZARDOUS WASTE GENERATION EPA ID TXD982290470
 INDUSTRIAL AND HAZARDOUS WASTE GENERATION SOLID WASTE REGISTRATION # (SWR) 74389
 PETROLEUM STORAGE TANK REGISTRATION 45740
 PETROLEUM STORAGE TANK REGISTRATION 45740
 AIR NEW SOURCE PERMITS ACCOUNT NUMBER EE10450
 AIR NEW SOURCE PERMITS AFS NUM 4814100095
 Location: 3120 SUN BOWL DR, EL PASO, TX, 79968 Rating Date: 9/1/2008 Repeat Violator: NO
 TCEQ Region: REGION 06 - EL PASO
 Date Compliance History Prepared: October 17, 2008
 Agency Decision Requiring Compliance History: Enforcement
 Compliance Period: October 17, 2003 to October 17, 2008
 TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History
 Name: Roshondra Lowe Phone: (713) 767-3553

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.)

- N/A
- | | | |
|---|------------|----------|
| 1 | 07/23/2004 | (282245) |
| 2 | 01/13/2005 | (346531) |
| 3 | 06/14/2005 | (376256) |
| 4 | 01/25/2006 | (450523) |
| 5 | 07/06/2006 | (484985) |
| 6 | 07/05/2007 | (566737) |
| 7 | 08/28/2008 | (700956) |

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

Date: 01/27/2006 (450523)

Self NO Classification: Moderate
 Citation: 30 TAC Chapter 334, SubChapter A 334.8(c)(5)(C)
 Description: Failure to ensure that USTs were permanently labeled according to the UST Registration Form.

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 334, SubChapter C 334.45(c)(3)(A)

Description: Failure to ensure that shear valves were anchored.

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



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
UNIVERSITY OF TEXAS AT EL
PASO
RN100220359

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BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

AGREED ORDER
DOCKET NO. 2008-1604-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 University of Texas at El Paso ("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 fleet fueling facility at 3120 Sun Bowl Drive in El Paso, El Paso County, Texas (the "Station").
2. The Station 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 September 8, 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 Seven Hundred Seventy Dollars (\$770) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent has paid Six Hundred Sixteen Dollars (\$616) of the administrative penalty and One

- Hundred Fifty-Four Dollars (\$154) 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.
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 received a fuel shipment, collected samples, and received results on August 29, 2008 demonstrating compliance with the Reid Vapor Pressure ("RVP") requirement.
 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.
 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 Station, the Respondent is alleged to have failed to comply with the 7.0 pounds per square inch absolute ("psia") maximum RVP requirement for unleaded gasoline transferred during the period of June 1, 2008 through September 16, 2008, in violation of 30 TEX. ADMIN. CODE § 115.252(2) and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on August 11, 2008. Specifically, gasoline samples taken from Pump No. 1 on August 11, 2008 were 7.7 psia which exceeded the 7.0 psia maximum RVP requirement.

III. DENIALS

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

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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: University of Texas at El Paso, Docket No. 2008-1604-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. 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 Station operations referenced in this Agreed Order.
3. 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.
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 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.

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SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission



For the Executive Director

2/16/2009
Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity 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.



Signature

1-8-09
Date

Robert D. Moss

Name (Printed or typed)
Authorized Representative of
University of Texas at El Paso

Asst. VP For EH&S

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.

