

Executive Summary – Enforcement Matter – Case No. 64832
STAFFORD MOBILE HOME PARK, INC
RN102080397
Docket No. 2023-1400-MWD-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

MWD

Small Business:

No

Location(s) Where Violation(s) Occurred:

Stafford MHP, 3411 5th Street, Stafford, Fort Bend County

Type of Operation:

Wastewater treatment facility

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: August 30, 2024

Comments Received: No

Penalty Information

Total Penalty Assessed: \$11,250

Amount Deferred for Expedited Settlement: \$2,250

Total Paid to General Revenue: \$9,000

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - High

Site/RN - High

Major Source: No

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: June 19, 2023

Date(s) of NOE(s): August 23, 2023

Executive Summary – Enforcement Matter – Case No. 64832
STAFFORD MOBILE HOME PARK, INC
RN102080397
Docket No. 2023-1400-MWD-E

Violation Information

Failed to maintain authorization to discharge wastewater into or adjacent to any water in the state. Specifically, authorization under Texas Pollutant Discharge Elimination System (“TPDES”) Permit No. WQ0014064001 expired on May 14, 2023, and the Respondent continued to operate the wastewater treatment facility without authorization [30 TEX. ADMIN. CODE §§ 305.65 and 305.125(2)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

By September 6, 2023, the Respondent submitted an application to TCEQ requesting authorization to discharge wastewater.

Technical Requirements:

The Order will require the Respondent to:

- a. Immediately, until such time that authorization to operate is obtained or until 300 days after the effective date of this Order, whichever is earlier, comply with the permit limits and conditions of expired TPDES Permit No. WQ0014064001; and
- b. Within 300 days, submit written certification that authorization to operate has been obtained or that operation has ceased until such time that appropriate authorization is obtained to demonstrate compliance.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Samantha Smith, Enforcement Division, Enforcement Team 1, MC R-12, (512) 239-2099; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: Niranjana Patel, President, STAFFORD MOBILE HOME PARK, INC, 6804 Bintliff Drive, Houston, Texas 77074

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	5-Sep-2023	Screening	15-Sep-2023	EPA Due	
	PCW	6-Dec-2023				

RESPONDENT/FACILITY INFORMATION

Respondent	STAFFORD MOBILE HOME PARK, INC				
Reg. Ent. Ref. No.	RN102080397				
Facility/Site Region	12-Houston	Major/Minor Source	Minor		

CASE INFORMATION

Enf./Case ID No.	64832	No. of Violations	1
Docket No.	2023-1400-MWD-E	Order Type	1660
Media Program(s)	Water Quality	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Samantha Smith
		EC's Team	Enforcement Team 1
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$12,500
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History	-10.0%	Adjustment	Subtotals 2, 3, & 7	-\$1,250
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Notes	Reduction for High Performer Classification.			
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Culpability	No	0.0%	Enhancement	Subtotal 4	\$0
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Notes	The Respondent does not meet the culpability criteria.			
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Good Faith Effort to Comply Total Adjustments	Subtotal 5	\$0
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$2,130	*Capped at the Total EB \$ Amount
Estimated Cost of Compliance	\$25,000	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$11,250
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes				
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Final Penalty Amount	\$11,250
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$11,250
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DEFERRAL	20.0%	Reduction	Adjustment	-\$2,250
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes	Deferral offered for expedited settlement.			
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PAYABLE PENALTY	\$9,000
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Screening Date	15-Sep-2023	Docket No.	2023-1400-MWD-E	PCW
Respondent	STAFFORD MOBILE HOME PARK, INC			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	64832			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN102080397			
Media	Water Quality			
Enf. Coordinator	Samantha Smith			

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

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

High Performer

Adjustment Percentage (Subtotal 7) -10%

>> Compliance History Summary

Compliance History Notes

Reduction for High Performer Classification.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) -10%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% -10%

Screening Date 15-Sep-2023 Respondent STAFFORD MOBILE HOME PARK, INC Case ID No. 64832 Reg. Ent. Reference No. RN102080397 Media Water Quality Enf. Coordinator Samantha Smith	Docket No. 2023-1400-MWD-E <div style="border: 1px solid black; padding: 2px;">30 Tex. Admin. Code §§ 305.65 and 305.125(2)</div>	PCW <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>
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Violation Number	1	Rule Cite(s)	
Violation Description	Failed to maintain authorization to discharge wastewater into or adjacent to any water in the state. Specifically, authorization under Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0014064001 expired on May 14, 2023, and the Respondent continued to operate the wastewater treatment facility without authorization.		

Base Penalty	\$25,000
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>> Environmental, Property and Human Health Matrix

OR		Harm			
	Release	Major	Moderate	Minor	
	Actual				
	Potential				

	Percent
	0.0%

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
		X			

	Percent
	10.0%

Matrix Notes	100% of the rule requirements were not met.
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Adjustment	\$22,500
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	\$2,500
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Violation Events

Number of Violation Events	5	124	Number of violation days
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	daily				
	weekly				
	monthly	X			
	quarterly				
	semiannual				
	annual				
	single event				

	Violation Base Penalty
	\$12,500

Five monthly events are recommended from the date TPDES Permit No. WQ0014064001 expired (May 14, 2023) to the screening date (September 15, 2023).

Good Faith Efforts to Comply

	0.0%		Reduction
			\$0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
Extraordinary			
Ordinary			
N/A	X		

Notes	The Respondent does not meet the good faith criteria for this violation.
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Violation Subtotal	\$12,500
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Economic Benefit (EB) for this violation

Estimated EB Amount	Statutory Limit Test
\$2,130	

Violation Final Penalty Total	\$11,250
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This violation Final Assessed Penalty (adjusted for limits)	\$11,250
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Economic Benefit Worksheet

Respondent STAFFORD MOBILE HOME PARK, INC
Case ID No. 64832
Reg. Ent. Reference No. RN102080397
Media Water Quality
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

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

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	\$25,000	14-May-2023	25-Jan-2025	1.70	\$2,130	n/a	\$2,130
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated Permit Costs to prepare and submit an application, and obtain authorization to discharge wastewater. Date required is the date TPDES Permit No. WQ0014064001 expired. Final date is the estimated date of compliance.

Avoided Costs

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

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				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$25,000

TOTAL

\$2,130



Compliance History Report

Compliance History Report for CN603001728, RN102080397, Rating Year 2023 which includes Compliance History (CH) components from September 1, 2018, through August 31, 2023.

Customer, Respondent, or Owner/Operator: CN603001728, STAFFORD MOBILE HOME PARK, INC **Classification:** HIGH **Rating:** 0.00

Regulated Entity: RN102080397, STAFFORD MHP **Classification:** HIGH **Rating:** 0.00

Complexity Points: 8 **Repeat Violator:** NO

CH Group: 14 - Other

Location: 3411 Fifth Street in the City of Stafford, Fort Bend County, Texas

TCEQ Region: REGION 12 - HOUSTON

ID Number(s):
WASTEWATER EPA ID TX0145050 **WASTEWATER** PERMIT WQ0016404001
WASTEWATER PERMIT WQ0014064002 **WASTEWATER** EPA ID TX0144720

Compliance History Period: September 01, 2018 to August 31, 2023 **Rating Year:** 2023 **Rating Date:** 09/01/2023

Date Compliance History Report Prepared: June 17, 2024

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: June 17, 2019 to June 17, 2024

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.
Name: Samantha Smith **Phone:** (512) 239-2099

Site and Owner/Operator History:

- 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/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	June 20, 2019	(1586636)	Item 14	September 15, 2020	(1688572)
Item 2	July 19, 2019	(1594862)	Item 15	September 28, 2020	(1682001)
Item 3	September 20, 2019	(1608074)	Item 16	October 16, 2020	(1694938)
Item 4	September 30, 2019	(1601161)	Item 17	November 16, 2020	(1717383)
Item 5	October 15, 2019	(1614940)	Item 18	December 14, 2020	(1717384)
Item 6	November 15, 2019	(1620728)	Item 19	January 20, 2021	(1717385)
Item 7	January 13, 2020	(1635707)	Item 20	March 02, 2021	(1730466)
Item 8	February 14, 2020	(1642322)	Item 21	March 23, 2021	(1730467)
Item 9	April 16, 2020	(1648832)	Item 22	April 12, 2021	(1730468)
Item 10	April 21, 2020	(1655187)	Item 23	May 18, 2021	(1742509)
Item 11	May 15, 2020	(1661745)	Item 24	June 11, 2021	(1742510)
Item 12	June 18, 2020	(1668281)	Item 25	July 20, 2021	(1753331)
Item 13	July 20, 2020	(1675227)	Item 26	August 20, 2021	(1758730)

Item 27	September 21, 2021	(1768048)	Item 43	February 20, 2023	(1891595)
Item 28	October 20, 2021	(1778595)	Item 44	March 20, 2023	(1900167)
Item 29	November 19, 2021	(1785263)	Item 45	April 19, 2023	(1906969)
Item 30	January 20, 2022	(1800149)	Item 46	May 19, 2023	(1914123)
Item 31	February 16, 2022	(1807979)	Item 47	June 20, 2023	(1920730)
Item 32	March 20, 2022	(1815021)	Item 48	July 19, 2023	(1927714)
Item 33	April 20, 2022	(1821590)	Item 49	August 20, 2023	(1934657)
Item 34	May 19, 2022	(1830490)	Item 50	September 20, 2023	(1940832)
Item 35	June 17, 2022	(1836737)	Item 51	October 20, 2023	(1947632)
Item 36	July 19, 2022	(1843922)	Item 52	November 20, 2023	(1953321)
Item 37	August 19, 2022	(1850083)	Item 53	December 20, 2023	(1963104)
Item 38	September 19, 2022	(1857853)	Item 54	January 20, 2024	(1969681)
Item 39	October 20, 2022	(1864207)	Item 55	February 20, 2024	(1978760)
Item 40	November 17, 2022	(1871116)	Item 56	March 20, 2024	(1985322)
Item 41	December 19, 2022	(1876971)	Item 57	April 20, 2024	(1991864)
Item 42	January 19, 2023	(1883782)	Item 58	June 07, 2024	(1989111)

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

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

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

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
STAFFORD MOBILE HOME PARK, INC
RN102080397

§ BEFORE THE
§
§ TEXAS COMMISSION ON
§
§ ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2023-1400-MWD-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding STAFFORD MOBILE HOME PARK, INC (the "Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a wastewater treatment facility located at 3411 Fifth Street in the City of Stafford, Fort Bend County, Texas ("the Facility"). The Facility is near or adjacent to water in the state as defined in TEX. WATER CODE § 26.001(5).
2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. WATER CODE ch. 26 and the rules of the TCEQ.
3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
4. An administrative penalty in the amount of \$11,250 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$9,000 of the penalty, and \$2,250 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.
5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). 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.

6. 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 Order.
7. This Order represents the complete and fully integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
9. The Executive Director recognizes that by September 6, 2023, the Respondent submitted an application to TCEQ requesting authorization to discharge wastewater.

II. ALLEGATIONS

During a record review for the Facility conducted on June 19, 2023, an investigator documented that the Respondent failed to maintain authorization to discharge wastewater into or adjacent to any water in the state, in violation of 30 TEX. ADMIN. CODE §§ 305.65 and 305.125(2). Specifically, authorization under Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0014064001 expired on May 14, 2023, and the Respondent continued to operate the wastewater treatment facility without authorization.

III. DENIALS

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

IV. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this 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. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: STAFFORD MOBILE HOME PARK, INC, Docket No. 2023-1400-MWD-E " to:

Financial Administration Division, Revenue Operations Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088

2. The Respondent shall undertake the following technical requirements:
 - a. Immediately upon the effective date of this Order, until such time that authorization to operate is obtained or until 300 days after the effective date of

this Order, whichever is earlier, comply with the permit limits and conditions of expired TPDES Permit No. WQ0014064001.

Respond completely and adequately, as determined by the TCEQ, to all requests for information concerning pending TPDES Permit No. WQ0014064002 within 30 days after the date of such requests or by any other deadline specified in writing.

- b. Within 300 days after the effective date of this Order, submit written certification that authorization to operate has been obtained or that operation has ceased until such time that appropriate authorization is obtained. The certification shall include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance. The certification shall be signed by the Respondent and shall include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

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

with a copy to:

Water Section Manager
Houston Regional Office
Texas Commission on Environmental Quality
5425 Polk Street, Suite H
Houston, Texas 77023-1452

3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
5. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this 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. Extension requests shall be sent to the Enforcement Division at the address listed above.

6. This 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 Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
7. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
8. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date



For the Executive Director

9/3/2024

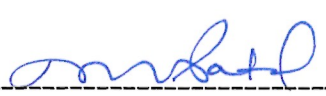
Date

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, 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 OAG 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 OAG 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



Date

NIRANJANA S PATEL

Name (Printed or typed)

PRESIDENT

Title

Authorized Representative of
STAFFORD MOBILE HOME PARK, INC

☒ If mailing address has changed, please check this box and provide the new address below:

7039 Greatwood Trails CT
Sugar Land, TX 77479

Instructions: Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.