

EXECUTIVE SUMMARY - ENFORCEMENT MATTER

DOCKET NO.: 2004-0821-PST-E TCEQ ID: RN102430907 CASE NO.: 16303

RESPONDENT NAME: AYERS' COMPANIES, INC. DBA COUNTY LINE TRUCK STOP

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 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 checked="" 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: 780 East Highway 80, Sunnyvale, Dallas County</p> <p>TYPE OF OPERATION: Convenience store with retail sales of gasoline.</p> <p>SMALL BUSINESS: <input checked="" type="checkbox"/> Yes <input 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 May 1, 2006. No comments were received.</p> <p>CONTACTS AND MAILING LIST: TCEQ Attorney: Mr. Benjamin Thompson, Litigation Division, MC 175, (512)239-1297 Ms. Jennifer Cook, Litigation Division, MC 175, (512) 239-1873 TCEQ Enforcement Coordinator: Mr. Jorge Ibarra, P.E., Air Enforcement Section, MC R-4, (817) 588-5890 TCEQ Regional Contact: Mr. Sam Barrett, DFW Regional Office, MC R-4, (817) 588-5903 Respondent: Mr. Ron Ayers, President, Ayers' Companies, Inc. dba County Line Truck Stop, 591 VZ County Road 2501, Canton, Texas 75103 Respondent's Attorney: Not represented by counsel in this enforcement matter.</p>		

VIOLATION SUMMARY CHART:		
VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>Type of Investigation:</p> <p><input type="checkbox"/> Complaint <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Enforcement Follow-up <input type="checkbox"/> Records Review</p> <p>Date of Complaints Relating to this Case: None</p> <p>Dates of Investigation Relating to this Case: March 31, 2004</p> <p>Date of NOE Relating to this Case: May 20, 2004</p> <p>Background Facts: The Litigation Division filed the EDPRP on August 8, 2005 and the Respondent filed its Answer on August 25, 2005. Litigation referred the case to SOAH on November 2, 2005, and a procedural schedule was established at the preliminary hearing on December 15, 2005. The Respondent later entered into an Agreed Order.</p> <p>PST</p> <p>1) Failed to maintain the Stage II vapor recovery system in proper operating condition, as specified by the manufacturer and/or any applicable CARB Executive Order and free of defects that would impair the effectiveness of the system [30 TEX. ADMIN. CODE § 115.242(3)(A) and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>2) Failed to make all necessary repairs, replacements or adjustments to faulty equipment, specifically, all six nozzles needed the vapor guards replaced [30 TEX. ADMIN. CODE § 115.242(5) and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>3) Failed to verify proper operation of the Stage II equipment by performing testing at least every 12 months or upon major system replacement or modification, whichever occurs first [30 TEX. ADMIN. CODE § 115.245(2) and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p>	<p>Total Assessed: \$8,740</p> <p>Total Deferred: \$2,252</p> <p><input type="checkbox"/> Expedited Settlement <input checked="" type="checkbox"/> Financial Inability to Pay</p> <p>SEP Conditional Offset: \$0</p> <p>Total Paid to General Revenue: \$188/\$6,300</p> <p>The Respondent has paid \$188 of the administrative penalty. The remaining amount of \$6,300 of the administrative penalty shall be payable in 35 monthly payments of \$180 each.</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 has implemented the following corrective measures:</p> <p>1) Conducted the full Stage II Vapor Recovery System testing on May 5, 2004.</p> <p>2) Conducted corrosion protection system testing on May 5, 2004.</p> <p>3) Conducted the UST line leak detector test on May 5, 2004.</p> <p>4) Made all necessary repairs, replacements, or adjustments to faulty equipment on May 13, 2004.</p> <p>5) Began maintaining the Stage II Vapor Recovery System in proper operating condition on May 13, 2004.</p> <p>6) Permanently labeled all tank fill pipes according to the UST registration form on May 13, 2004.</p> <p>7) Started maintaining all USTs at the Station in "active" status on May 13, 2004.</p> <p>8) Began receiving a "passing" analysis report for USTs on June 30, 2004.</p>

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>4) Failed to permanently label all tank fill pipes according to the registration form [30 TEX. ADMIN. CODE § 334.8(c)(5)(C)].</p> <p>5) Failed to inspect and test the corrosion protection system within three to six months after installation and once every three years thereafter [30 TEX. ADMIN. CODE § 334.49(c)(4) and TEX. WATER CODE § 26.3475(d)].</p> <p>6) Failed to ensure that a regulated substance has been removed from a UST to a depth of less than 2.5 centimeters or 0.3% by weight of the system at full capacity in order to be considered an out-of-service tank [30 TEX. ADMIN. CODE § 334.54(d)(2)].</p> <p>7) Failed to test a line leak detector at least once per year for performance and operational reliability [30 TEX. ADMIN. CODE § 334.50(b)(2)(A)(i)(III) and TEX. WATER CODE § 26.3475(a)].</p> <p>8) Failed to report to the TCEQ within 72 hours of the time of receipt of any "inconclusive" analysis report for USTs [30 TEX. ADMIN. CODE § 334.50(d)(9)(A)(v) and TEX. WATER CODE § 26.3475(c)].</p>		



Policy Revision 2 (September 2002)

Penalty Calculation Worksheet (PCW)

PCW Revision May 17, 2004

DATES

PCW Screening Priority Due EPA Due

RESPONDENT/FACILITY INFORMATION

Respondent
 Reg. Ent. Ref. No.
 Additional ID No(s)
 Facility/Site Region Major/Minor Source

CASE INFORMATION

Enf./Case ID No. No. of Violations
 Docket No. Order Type
 Case Priority Enf. Coordinator
 Media Program(s) EC's Team
 Multi-Media
 Admin. Penalty \$ Limit Minimum Maximum

Penalty Calculation Section

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

ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History Subtotals 2, 3, & 7

Notes

Culpability 0% Enhancement Subtotal 4

Notes

Good Faith Effort to Comply Subtotal 5

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

Notes

Economic Benefit Subtotal 6

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

SUM OF SUBTOTALS 1-7 Final Subtotal

OTHER FACTORS AS JUSTICE MAY REQUIRE Adjustment

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

Notes

Final Penalty Amount

STATUTORY LIMIT ADJUSTMENT Final Assessed Penalty

DEFERRAL Reduction Adjustment

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

Notes

PAYABLE PENALTY

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Screening Date 09-Jun-2004 **Docket No.** 2004-0821-PST-E **PCW**

Respondent Ayers' Companies, Inc. dba County Line Truck Stop *Policy Revision 2 (September 2002)*

Case ID No. Case ID No. 16303 *PCW Revision May 17, 2004*

Reg. Ent. Reference No. Petroleum Storage Tank Facility ID No. 16431

Additional ID No(s). RN102430907

Media [Statute] Petroleum Storage Tank

Enf. Coordinator Jorge Ibarra, P.E.

Site Address 780 East Highway 80, Sunnyvale, Dallas County, Texas 75182

Compliance History Worksheet

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

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action <i>(number of NOVs meeting criteria)</i>	0	0%
	Other written NOVs	1	2%
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 (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 <i>(number of audits for which notices were disclosed)</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%
<i>Please Enter Yes or No</i>			
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 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 The respondent was issued an NOV on 07/24/2000 without the same or similar type of violations.

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

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Screening Date 09-Jun-2004 **Docket No.** 2004-0821-PST-E **PCW**

Respondent Ayers' Companies, Inc. dba County Line Truck Stop *Policy Revision 2 (September 2002)*

Case ID No. Case ID No. 16303 *PCW Revision May 17, 2004*

Reg. Ent. Reference No. Petroleum Storage Tank Facility ID No. 16431

Additional ID No(s). RN102430907

Media [Statute] Petroleum Storage Tank

Enf. Coordinator Jorge Ibarra, P.E.

Violation Number

Primary Rule Cite(s)

Secondary Rule Cite(s)

Violation Description
 Failure to maintain the Stage II vapor recovery system in proper operating condition as specified by the manufacturer and/or any applicable CARB Executive Order and free of defects that would impair the effectiveness of the system and to make all necessary repairs, replacements or adjustments to faulty equipment. Specifically, all six nozzles needed the vapor guards replaced and the regular unleaded had a gasket missing from the fill cap.

Base Penalty

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

		Harm			
		Major	Moderate	Minor	
OR	Release	<input type="text"/>	<input type="text"/>	<input checked="" type="checkbox"/>	Percent <input type="text" value="10%"/>
	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	
	Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>	

>> **Programmatic Matrix**

		Major	Moderate	Minor	
	Falsification	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text"/>

Matrix Notes
 Failure to maintain the Stage II vapor recovery system in proper operating condition resulted in the release of insignificant amounts of pollutants which do not exceed levels that are protective of human health or the environment.

Adjustment

Base Penalty Subtotal

Violation Events

Number of Violation Events

mark only one use a small x	daily	<input type="text"/>	Violation Base Penalty <input type="text" value="\$1,000"/>
	monthly	<input type="text"/>	
	quarterly	<input checked="" type="checkbox"/>	
	semiannual	<input type="text"/>	
	annual	<input type="text"/>	
	single event	<input type="text"/>	

The penalty was calculated from the inspection date (March 31, 2004) to the compliance date (May 13, 2004).

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount <input type="text" value="\$4"/>	Violation Final Penalty Total <input type="text" value="\$920"/>
This violation Final Assessed Penalty (adjusted for limits) <input type="text" value="\$920"/>	

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Economic Benefit Worksheet

Respondent: Ayers' Companies, Inc. dba County Line Truck Stop
 Case ID No. Case ID No. 16303
 Reg. Ent. Reference No. Petroleum Storage Tank Facility ID No. 16431
 Additional ID No(s). RN102430907
 Media [Statute] Petroleum Storage Tank
 Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Delayed Costs							
Equipment	\$500	31-Mar-2004	13-May-2004	0.1	\$0	\$4	\$4
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs: Estimated cost to properly operate and maintain the Stage II vapor recovery system as specified.

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

Notes for AVOIDED costs:

Approx. Cost of Compliance TOTAL

Screening Date 09-Jun-2004

AyersCompanies.dpw

Docket No. 2004-0821-PST-E

PCW

Respondent Ayers' Companies, Inc. dba County Line Truck Stop

Policy Revision 2 (September 2002)

Case ID No. Case ID No. 16303

PCW Revision May 17, 2004

Reg. Ent. Reference No. Petroleum Storage Tank Facility ID No. 16431

Additional ID No(s) RN102430907

Media [Statute] Petroleum Storage Tank

Enf. Coordinator Jorge Ibarra, P.E.

Violation Number

Primary Rule Cite(s)

Secondary Rule Cite(s)

Violation Description

Failure to verify proper operation of the Stage II equipment by performing testing at least once every 12 months or upon major system replacement or modification, whichever occurs first. Specifically, annual testing was due on August 16, 2002 and full compliance testing was due on August 16, 2003.

Base Penalty

>> Environmental, Property and Human Health Matrix

Release	Harm			Percent
	Major	Moderate	Minor	
Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="10%"/>
Potential	<input type="text"/>	<input checked="" type="checkbox"/>	<input type="text"/>	

>> Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent
<input type="text"/>				

Matrix Notes

Adjustment

Base Penalty Subtotal

Violation Events

Number of Violation Events

mark only one use a small x	daily	<input type="text"/>
	monthly	<input type="text"/>
	quarterly	<input type="text"/>
	semiannual	<input type="text"/>
	annual	<input type="text"/>
	single event	<input checked="" type="checkbox"/>

Violation Base Penalty

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount

Violation Final Penalty Total

This violation Final Assessed Penalty (adjusted for limits)

Ayers Companies.ppw

Economic Benefit Worksheet

Respondent Ayers' Companies, Inc. dba County Line Truck Stop
 Case ID No. Case ID No. 16303
 Reg. Ent. Reference No. Petroleum Storage Tank Facility ID No. 16431
 Additional ID No(s). RN102430907
 Media [Statute] Petroleum Storage Tank
 Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling	\$500	16-Aug-2002	05-May-2004	1.7	\$43	n/a	\$43
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs Estimated cost to conduct the required triennial and annual vapor recovery system testings.

Avoided Costs

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

Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

TOTAL

Ayers Companies, Inc. **Docket No.** 2004-0821-PST-E **PCW**

Screening Date 09-Jun-2004 *Policy Revision 2 (September 2002)*
Respondent Ayers' Companies, Inc. dba County Line Truck Stop *PCW Revision May 17, 2004*
Case ID No. Case ID No. 16303

Reg. Ent. Reference No. Petroleum Storage Tank Facility ID No. 16431
Additional ID No(s) RN102430907
Media [Statute] Petroleum Storage Tank
Enf. Coordinator Jorge Ibarra, P.E.

Violation Number
Primary Rule Cite(s)
Secondary Rule Cite(s)
Violation Description

Base Penalty

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

Harm

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

>> **Programmatic Matrix**

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

Matrix Notes

Adjustment

Base Penalty Subtotal

Violation Events

Number of Violation Events

<i>mark only one use a small x</i>	<i>daily</i>	<input type="text"/>
	<i>monthly</i>	<input type="text"/>
	<i>quarterly</i>	<input type="text"/>
	<i>semiannual</i>	<input type="text"/>
	<i>annual</i>	<input type="text"/>
	<i>single event</i>	x

Violation Base Penalty

One single event is recommended based on the findings documented during the inspection of March 31, 2004.

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount <input type="text" value="\$1"/>	Violation Final Penalty Total <input type="text" value="\$920"/>
This violation Final Assessed Penalty (adjusted for limits) <input type="text" value="\$920"/>	

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Economic Benefit Worksheet

Respondent Ayers' Companies, Inc. dba County Line Truck Stop
 Case ID No. Case ID No. 16303
 Reg. Ent. Reference No. Petroleum Storage Tank Facility ID No. 16431
 Additional ID No(s). RN102430907
 Media [Statute] Petroleum Storage Tank
 Violation No. 3

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$200	31-Mar-2004	13-May-2004	0.1	\$1	n/a	\$1

Notes for DELAYED costs: Estimated cost to provide proper labeling to the UST system.

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

Notes for AVOIDED costs:

Approx. Cost of Compliance TOTAL

AyersCompanies.gpw

Screening Date 09-Jun-2004

Docket No. 2004-0821-PST-E

PCW

Respondent Ayers' Companies, Inc. dba County Line Truck Stop

Policy Revision 2 (September 2002)

Case ID No. Case ID No. 16303

PCW Revision May 17, 2004

Reg. Ent. Reference No. Petroleum Storage Tank Facility ID No. 16431

Additional ID No(s) RN102430907

Media [Statute] Petroleum Storage Tank

Enf. Coordinator Jorge Ibarra, P.E.

Violation Number

Primary Rule Cite(s)

Secondary Rule Cite(s)

Violation Description

Base Penalty

>> Environmental, Property and Human Health Matrix

		Harm			
Release		Major	Moderate	Minor	
OR	Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text" value="25%"/>
	Potential	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

>> Programmatic Matrix

		Major	Moderate	Minor	
Matrix Notes	Falsification	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text"/>
	<input type="text" value="Failure to inspect and test the corrosion protection system once every three years could result in the release of significant amounts of pollutants that would exceed levels that are protective of human health or the environment."/>				

Adjustment

Base Penalty Subtotal

Violation Events

Number of Violation Events

mark only one use a small x	daily	<input type="text"/>
	monthly	<input type="text"/>
	quarterly	<input type="text"/>
	semiannual	<input type="text"/>
	annual	<input type="text"/>
	single event	<input checked="" type="checkbox"/>

Violation Base Penalty

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount

Violation Final Penalty Total

This violation Final Assessed Penalty (adjusted for limits)

Ayers Companies, Inc.

Economic Benefit Worksheet

Respondent Ayers' Companies, Inc. dba County Line Truck Stop
 Case ID No. Case ID No. 16303
 Reg. Ent. Reference No. Petroleum Storage Tank Facility ID No. 16431
 Additional ID No(s). RN102430907
 Media [Statute] Petroleum Storage Tank
 Violation No. 4

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling	\$500	18-Aug-2003	05-May-2004	0.7	\$18	n/a	\$18
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs: Estimated cost to perform the three year compliance testing.

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

Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs:

Approx. Cost of Compliance **\$500** TOTAL **\$18**

Screening Date 09-Jun-2004

AyersCompanies.qpw

Docket No. 2004-0821-PST-E

PCW

Respondent Ayers' Companies, Inc. dba County Line Truck Stop

Policy Revision 2 (September 2002)

Case ID No. Case ID No. 16303

PCW Revision May 17, 2004

Reg. Ent. Reference No. Petroleum Storage Tank Facility ID No. 16431

Additional ID No(s) RN102430907

Media [Statute] Petroleum Storage Tank

Enf. Coordinator Jorge Ibarra, P.E.

Violation Number

5

Primary Rule Cite(s)

30 Tex. Admin. Code § 334.54(d)(2)

Secondary Rule Cite(s)

Violation Description

Failure to ensure that a regulated substance has been removed from an underground storage tank to a depth of less than 2.5 centimeters or 0.3% by weight of the system at full capacity in order to be considered an out-of-service tank. Specifically, Tank No. 5 had approximately 6 inches of product while registered as an out-of-service tank.

Base Penalty

\$10,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential			X

Percent 5%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent

Matrix Notes

Failure to ensure that a regulated substance has been properly removed from an out-of service tank could result in the release of insignificant amounts of pollutants which would not exceed levels that are protective of human health or the environment.

Adjustment -\$9,500

Base Penalty Subtotal

\$500

Violation Events

Number of Violation Events 1

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

Violation Base Penalty

\$500

One single event is recommended based on the findings documented during the inspection of March 31, 2004.

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$1

Violation Final Penalty Total

\$460

This violation Final Assessed Penalty (adjusted for limits)

\$460

Ayers Companies.qpw

Economic Benefit Worksheet

Respondent Ayers' Companies, Inc. dba County Line Truck Stop
 Case ID No. Case ID No. 16303
 Reg. Ent. Reference No. Petroleum Storage Tank Facility ID No. 16431
 Additional ID No(s). RN102430907
 Media [Statute] Petroleum Storage Tank
 Violation No. 5

Percent Interest	Years of Depreciation
5.0	15

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

Delayed Costs

Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$200	31-Mar-2004	13-May-2004	0.1	\$1	n/a	\$1

Notes for DELAYED costs

Estimated cost to ensure that a regulated substance has been properly removed from an out-of service tank.

Avoided Costs

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

Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

TOTAL

Screening Date 09-Jun-2004

Ayers Companies, opw

Docket No. 2004-0821-PST-E

PCW

Respondent Ayers' Companies, Inc. dba County Line Truck Stop

Policy Revision 2 (September 2002)

Case ID No. 16303

PCW Revision May 17, 2004

Reg. Ent. Reference No. Petroleum Storage Tank Facility ID No. 16431

Additional ID No(s) RN102430907

Media [Statute] Petroleum Storage Tank

Enf. Coordinator Jorge Ibarra, P.E.

Violation Number 6

Primary Rule Cite(s) 30 Tex. Admin. Code § 334.50(b)(2)(A)(i)(III) and (d)(9)(A)(v)

Secondary Rule Cite(s) Tex. Water Code § 26.3475(a) and (c)

Violation Description

Failure to test a line leak detector at least once per year for performance and operational reliability and to report to the TCEQ within 72 hours of the time of receipt of any "inconclusive" analysis report for USTs. Specifically, the annual test was never conducted and SIRs reports from September 2003 through February 2004 for UST No. 4 (diesel) were "inconclusive". However, February re-submittal SIR showed a "passing" result.

Base Penalty \$10,000

>> Environmental, Property and Human Health Matrix

Release	Harm			Percent
	Major	Moderate	Minor	
Actual				25%
Potential	X			

>> Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent

Matrix Notes

Failure to test a line leak detector at least once per year for performance and operational reliability and to report to the TCEQ within 72 hours of the time of receipt of any "inconclusive" analysis report for USTs could result in the release of significant amounts of pollutants that would exceed levels that are protective of human health or the environment.

Adjustment -\$7,500

Base Penalty Subtotal \$2,500

Violation Events

Number of Violation Events 1

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

Violation Base Penalty \$2,500

The penalty was calculated from the inspection date (March 31, 2004) to the compliance date (June 30, 2004). Quarterly events are recommended to make the penalty commensurate with the situation.

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$5

Violation Final Penalty Total \$2,300

This violation Final Assessed Penalty (adjusted for limits) \$2,300

Ayers Companies.ppw

Economic Benefit Worksheet

Respondent Ayers' Companies, Inc. dba County Line Truck Stop
 Case ID No. Case ID No. 16303
 Reg. Ent. Reference No. Petroleum Storage Tank Facility ID No. 16431
 Additional ID No(s). RN102430907
 Media [Statute] Petroleum Storage Tank
 Violation No. 6

Percent Interest	Years of Depreciation
5.0	15

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

Delayed Costs

Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling	\$200	31-Mar-2004	05-May-2004	0.1	\$1	n/a	\$1
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$100	01-Sep-2003	30-Jun-2004	0.8	\$4	n/a	\$4

Notes for DELAYED costs

Estimated cost to test a line leak detector at least once per year for performance and operational reliability and to report to the TCEQ within 72 hours of the time of receipt of any "inconclusive" analysis report for USTs.

Avoided Costs

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

Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

TOTAL

Compliance History

Customer/Respondent/Owner-Operator:	CN601255680 AYERS COMPANIES INC	Classification: AVERAGE	Rating: 0.600
Regulated Entity:	RN102430907 COUNTY LINE TRUCK STOP	Classification: AVERAGE	Site Rating: 0.60
ID Number(s):	PETROLEUM STORAGE TANK REGISTRATION	REGISTRATION	16431
Location:	780 E HIGHWAY 80, SUNNYVALE, TX, 75182	Rating Date: 9/1/03	Repeat Violator: NO
TCEQ Region:	REGION 04 - DFW METROPLEX		
Date Compliance History Prepared:	June 14, 2004		
Agency Decision Requiring Compliance History:	Enforcement		
Compliance Period:	June 14, 1999 to June 14, 2004		

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

Name: Jorge Ibarra Phone: (817) 588-5890

Site Compliance History Components

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

Components (Multimedia) for the Site :

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

N/A

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

N/A

C. Chronic excessive emissions events.

N/A

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

- 1 07/24/2000 (114787)
- 2 05/21/2004 (267861)
- 3 08/21/2000 (43052)
- 4 07/24/2000 (43053)
- 5 08/21/2000 (43054)

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

Date: 07/24/2000 (114787)

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter C 115.242(9)[G]

Description: FAILURE TO COMPLY

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
AYERS' COMPANIES, INC. DBA
COUNTY LINE TRUCK STOP;
TCEQ ID NO. 16431, RN102430907

§
§
§
§
§
§

BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

AGREED ORDER
DOCKET NO. 2004-0821-PST-E

I. JURISDICTION AND STIPULATIONS

At its _____ agenda, the Texas Commission on Environmental Quality ("Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Ayers' Companies, Inc. dba County Line Truck Stop ("Ayers' Companies") under the authority of TEX. WATER CODE chs. 7 and 26 and TEX. HEALTH & SAFETY CODE ch. 382. The Executive Director of the TCEQ, represented by the Litigation Division, and Ayers' Companies appear before the Commission and together stipulate that:

1. Ayers' Companies owns and operates a convenience store with retail sales of gasoline located at 780 East Highway 80, Sunnyvale, Dallas County, Texas (the "Station").
2. This Agreed Order is entered into pursuant to TEX. WATER CODE §§ 7.051 and 7.070. The Commission has jurisdiction of this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. HEALTH & SAFETY CODE ch. 382, TEX. WATER CODE ch. 26, and TCEQ rules.
3. The Commission and Ayers' Companies agree that the Commission has jurisdiction to enter this Agreed Order, and that Ayers' Companies is subject to the Commission's jurisdiction.
4. Ayers' Companies received notice of the violations alleged in Section II ("Allegations") on or about May 25, 2004.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Ayers' Companies of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

AYERS' COMPANIES, INC. DBA COUNTY LINE TRUCK STOP

DOCKET NO. 2004-0821-PST-E

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6. An administrative penalty in the amount of eight thousand seven hundred forty dollars (\$8,740.00) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Financial Assurance Section of the Commission's Financial Administration Division reviewed the financial documentation submitted by Ayers' Companies and determined that Ayers' Companies is unable to pay part of the administrative penalty. Therefore, two thousand two hundred fifty-two dollars (\$2,252.00) of the penalty is deferred contingent upon Ayers' Companies' 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 Ayers' Companies fails to timely and satisfactorily comply with all requirements of this Agreed Order, including the payment schedule, the Executive Director may require Ayers' Companies to pay all or part of the deferred penalty.

Ayers' Companies has paid one hundred eighty-eight dollars (\$188.00) dollars of the undeferred administrative penalty. The remaining amount of six thousand three hundred dollars (\$6,300.00) shall be payable in thirty-five (35) monthly payments of one hundred eighty dollars (\$180.00) dollars each. The first 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. If Ayers' Companies fails to timely and satisfactorily comply with the payment requirements of this Agreed Order, the Executive Director may, at his 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 acceleration of any remaining balance constitutes the failure by Ayers' Companies to timely and satisfactorily comply with all the terms of this Agreed Order and the Executive Director may demand payment of any deferred penalty amount.

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 Ayers' Companies 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 Ayers' Companies has implemented the following corrective measures at the Station:
 - a. Conducted the full Stage II vapor recovery system testing on May 5, 2004;
 - b. Conducted corrosion protection system testing on May 5, 2004;
 - c. Conducted the UST line leak detector test on May 5, 2004;

- d. Made all necessary repairs, replacements, or adjustments to faulty equipment on May 13, 2004;
 - e. Began maintaining the Stage II vapor recovery system in proper operating condition on May 13, 2004;
 - f. Permanently labeled all tank fill pipes according to the UST registration form on May 13, 2004;
 - g. Started maintaining all USTs at the Station in "active" status on May 13, 2004; and
 - h. Began receiving a "passing" analysis report for USTs on June 30, 2004.
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 Ayers' Companies 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

Ayers' Companies is alleged to have violated:

- 1. 30 TEX. ADMIN. CODE § 115.242(3)(A) and TEX. HEALTH & SAFETY CODE § 382.085(b) by failing to maintain the Stage II vapor recovery system in proper operating condition as specified by the manufacturer and/or any applicable CARB Executive Order and free of any defects that would impair the effectiveness of the system, as documented on March 31, 2004.
- 2. 30 TEX. ADMIN. CODE § 115.242(5) and TEX. HEALTH & SAFETY CODE § 382.085(b) by failing to make all necessary repairs, replacements, or adjustments to faulty equipment, as documented on March 31, 2004.
- 3. 30 TEX. ADMIN. CODE § 115.245(2) and TEX. HEALTH & SAFETY CODE § 382.085(b) by failing to verify proper operation of the Stage II equipment by performing operational tests at

least once every 12 months or upon major system replacement or modification, whichever occurs first, as documented on March 31, 2004.

4. 30 TEX. ADMIN. CODE § 334.8(c)(5)(C) by failing to properly label the UST fill pipes according to the UST information provided to the TCEQ on the Station's UST Registration and Self-Certification Form, as documented on March 31, 2004.
5. 30 TEX. ADMIN. CODE § 334.49(c)(4) and TEX. WATER CODE § 26.3475(d) by failing to inspect and test the corrosion protection system for operability and adequacy of protection within three to six months after installation and once every three years thereafter, as documented on March 31, 2004.
6. 30 TEX. ADMIN. CODE § 334.54(d)(2) by failing to ensure that a regulated substance has been removed from a UST to a depth of less than 2.5 centimeters or 0.3% by weight of the system at full capacity in order to qualify as an out-of-service tank, as documented on March 31, 2004.
7. 30 TEX. ADMIN. CODE § 334.50(b)(2)(A)(i)(III) and TEX. WATER CODE § 26.3475(a) by failing to test a line leak detector at least once per year for performance and operational reliability, as documented on March 31, 2004.
8. 30 TEX. ADMIN. CODE § 334.50(d)(9)(A)(v) and TEX. WATER CODE § 26.3475(c) by failing to report to the TCEQ within 72 hours of the receipt of any "inconclusive" statistical inventory reconciliation (SIR) analysis report for USTs, as documented on March 31, 2004.

III. DENIALS

Ayers' Companies generally denies each allegation in Section II ("Allegations").

IV. ORDER

1. It is, therefore, ordered by the TCEQ that Ayers' Companies pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Ayers' Companies' 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 considering or requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "Texas Commission on Environmental Quality" and shall be sent with the notation "Re: Ayers' Companies, Inc. dba County Line Truck Stop, Docket No. 2004-0821-PST-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 Ayers' Companies. Ayers' Companies 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 Ayers' Companies 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) and TEX. GOV'T CODE § 2001.142, the effective date of this Agreed Order is the date of hand-delivery of the Order to Ayers' Companies, or three days after the date on which the Commission mails notice of the Order to Ayers' Companies, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

AYERS' COMPANIES, INC. DBA COUNTY LINE TRUCK STOP
DOCKET NO. 2004-0821-PST-E
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SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Loberegon Penline
For the Executive Director

4/7/06
Date

I, the undersigned, have read and understand the attached Agreed Order. I represent that I am authorized to agree to the attached Agreed Order on behalf of the entity, if any, indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

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

- A negative impact on my compliance history;
- Greater scrutiny of any permit applications submitted by me;
- Referral of this case to the Attorney General's office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions against me;
- Automatic referral to the Attorney General's Office of any future enforcement actions against me; and
- TCEQ seeking other relief as authorized by law.

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

[Signature]
Signature

2-14-06
Date

Ron Ayers
Name (Printed or typed)

Tres
Title

Authorized representative of
Ayers' Companies, Inc. dba County Line Truck Stop