

EXECUTIVE SUMMARY - ENFORCEMENT MATTER Page 1 of 2  
 DOCKET NO.: 2006-1312-AIR-E TCEQ ID: RN102777497 CASE NO.: 30787  
 RESPONDENT NAME: CIRCLE K STORES INC.

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

SITE WHERE VIOLATION(S) OCCURRED: 1500 George Dieter Drive, El Paso, El Paso County

TYPE OF OPERATION: Gasoline dispensing station

SMALL BUSINESS:  Yes  No

OTHER SIGNIFICANT MATTERS: There are no complaints. There is no record of additional pending enforcement actions regarding this facility location.

INTERESTED PARTIES: No one other than the ED and the Respondent has expressed an interest in this matter.

COMMENTS RECEIVED: The *Texas Register* comment period expired on March 10, 2008. No comments were received.

CONTACTS AND MAILING LIST:

TCEQ Attorney: Ms. Jacquelyn Boutwell, Litigation Division, MC 175, (512) 239-5846  
 Ms. Jennifer Cook, Litigation Division, MC 175, (512) 239-1873  
 TCEQ Enforcement Coordinator: Ms. Trina Grieco, Air Enforcement Section, MC R-13, (210) 403-4006  
 TCEQ Regional Contact: Mr. Terry McMillan, El Paso Regional Office, MC R-6, (915) 834-4953  
 Respondent: Ms. Theresa Denny, Fuel Distribution Supervisor, Circle K Stores, Inc. P.O. Box 52085,  
 Phoenix, Arizona 85072  
 Respondent's Attorney: Not represented by counsel on this enforcement matter.

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>Date of Investigation Relating to this Case: June 5, 2006</p> <p>Date of NOV/NOE Relating to this Case: August 5, 2006 (NOE)</p> <p>Background Facts:</p> <p>The EDPRP was filed on April 5, 2007. The Respondent signed an Agreed Order on January 14, 2008.</p> <p>The Respondent in this case does not owe any other penalties according to the Administrative Penalty Database.</p> <p>AIR</p> <p>Failed to comply with the maximum 7.0 pounds per square inch absolute (psia) Reid Vapor Pressure (RVP) requirements during the control period of June 1, 2006 through September 16, 2006 [30 TEX. ADMIN. CODE § 115.252(2) and TEX. HEALTH &amp; SAFETY CODE § 382.085(b)].</p>	<p>Total Assessed: \$1,000</p> <p>Total Deferred: \$0</p> <p>Total Paid to General Revenue: \$1,000</p> <p>The Respondent has paid the \$1,000 administrative penalty in full.</p> <p>Site Compliance History Classification <input checked="" type="checkbox"/> High <input 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>Ordering Provision(s)</p> <p>The Respondent shall undertake the following technical requirements:</p> <p>1) Within 30 days, establish and implement a process which will ensure the RVP for gasoline dispensed between June 1<sup>st</sup> and September 16<sup>th</sup> of each year shall not exceed 7.0 psia.</p> <p>2) Within 45 days, submit written notarized certification of compliance with detailed supporting documentation, including photographs, receipts, and other records to demonstrate compliance with the above Ordering Provision.</p>



Penalty Calculation Worksheet (PCW) Policy Revision 2 (September 2002) PCW Revision May 19, 2005

DATES Assigned  PCW  Screening  EPA Due

RESPONDENT/FACILITY INFORMATION  
 Respondent   
 Reg. Ent. Ref. No.   
 Facility/Site Region  Major/Minor Source

CASE INFORMATION  
 Enf./Case ID No.  No. of Violations   
 Docket No.  Order Type   
 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 0% Enhancement Subtotals 2, 3, & 7

Notes

Culpability  0% Enhancement Subtotal 4

Notes

Good Faith Effort to Comply 0% Reduction Subtotal 5

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

Notes

Economic Benefit 0% Enhancement Subtotal 6

Total EB Amounts	\$239
Approx. Cost of Compliance	\$900

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

Screening Date 1 ig-2006  
 Respondent Circle K Stores Inc  
 Case ID No. 30787  
 Reg. Ent. Reference No. RN102777497  
 Media [Statute] Air Quality  
 Enf. Coordinator Jessica Rhodes

Docket No. 2006-1312-AI

PCW

Policy Revision 2 (September 2002)

PCW Revision May 19, 2005

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

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

Please Enter Yes or No

Adjustment Percentage (Subtotal 2) 0%

>> Repeat Violator (Subtotal 3)

No <

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Average Performer <

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

There is no penalty adjustment.

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

Screening Date 1: j-2006

Docket No. 2006-1312-All

PCW

Respondent Circle K Stores Inc

Policy Revision 2 (September 2002)

Case ID No. 30787

PCW Revision May 19, 2005

Reg. Ent. Reference No. RN102777497

Media [Statute] Air Quality

Enf. Coordinator Jessica Rhodes

Violation Number

Primary Rule Cite(s) 30 Tex. Admin. Code § 115.252(2)

Secondary Rule Cite(s) Tex. Health & Safety Code § 382.085(b)

Violation Description Failure to comply with the maximum 7.0 pounds per square inch absolute (psia) Reid Vapor Pressure (RVP) requirements during the control period of June 1 - September 16, 2006. Specifically, a premium grade gasoline sample with a reading of 7.38 psia was taken from pump number two, as documented during an inspection conducted on June 5, 2006.

Base Penalty

Environmental, Property and Human Health Matrix

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

Programmatic Matrix

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

Matrix Notes Human health or the environment was exposed to insignificant amounts of pollutants which did 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"/>
	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

One single event is recommended.

Economic Benefit (EB) for this violation Statutory Limit Test

Estimated EB Amount

Violation Final Penalty Total

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent Circle K Stores Inc  
 Case ID No. 30787  
 Reg. Ent. Reference No. RN102777497  
 Media [Statute] Air Quality  
 Violation No. 1

Percent Interest 5.0  
 Years of Depreciation 15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
<b>Delayed Costs</b>							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling	\$700	05-Jun-2006	01-Apr-2007	0.8	\$29	n/a	\$29
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 of implementing procedures to ensure the required RVP is maintained. Date required is the date of the investigation. Final date is the estimated date of compliance

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
<b>Avoided Costs</b>							
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)	\$200	05-Jun-2006	16-Sep-2006	1.0	\$10	\$200	\$210

Notes for AVOIDED costs: Costs avoided by dispensing and utilizing gasoline having a RVP greater than 7.0 psia. The Date Required is the date of the investigation. The Final Date is the last day of the control period with RVP requirements.

Approx. Cost of Compliance: \$900

TOTAL: \$239

# Compliance History

Customer/Respondent/Owner-Operator: CN600134456 Circle K Stores Inc Classification: AVERAGE Rating: 1.70  
Regulated Entity: RN102777497 CIRCLE K STORES 2701506 Classification: HIGH Site Rating: 0.00  
D Number(s): AIR NEW SOURCE PERMITS ACCOUNT NUMBER EE1101G  
PETROLEUM STORAGE TANK REGISTRATION 5464  
REGISTRATION  
Location: 1500 GEORGE DIETER DR, EL PASO, TX, 79936 Rating Date: 9/1/2005 Repeat Violator: NO  
CEQ Region: REGION 06 - EL PASO  
Date Compliance History Prepared: August 09, 2006  
Agency Decision Requiring Compliance History: Enforcement  
Compliance Period: August 08, 2001 to August 09, 2006  
CEQ Staff Member to Contact for Additional Information Regarding this Compliance History  
Name: Jessica Rhodes Phone: 512-239-2879

## Site Compliance History Components

Has the site been in existence and/or operation for the full five year compliance period? Yes  
Has there been a (known) change in ownership of the site during the compliance period? No  
If Yes, who is the current owner? N/A  
If Yes, who was/were the prior owner(s)? N/A  
When did the change(s) in ownership occur? N/A

### Components (Multimedia) for the Site :

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

N/A

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

N/A

Chronic excessive emissions events.

N/A

The approval dates of investigations. (CEEDS Inv. Track. No.)

1	08/15/2002	(5906)
2	10/30/2001	(73679)
3	08/27/2005	(407406)
4	11/22/2002	(14246)
5	11/01/2004	(339373)
6	07/31/2006	(489327)
7	10/19/2004	(338054)
8	12/29/2005	(449458)
9	03/27/2003	(25049)
10	07/30/2004	(282783)
11	05/01/2003	(35316)
12	08/24/2005	(406610)

Written notices of violations (NOV). (CEEDS Inv. Track. No.)

N/A

Environmental audits.

N/A

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  
CIRCLE K STORES, INC.  
RN102777497

§  
§  
§  
§  
§

BEFORE THE  
TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY

AGREED ORDER

DOCKET NO. 2006-1312-AIR-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 Circle K Stores, Inc. ("Circle K") under the authority of TEX. WATER CODE ch. 7 and TEX. HEALTH & SAFETY CODE ch. 382. The Executive Director of the TCEQ, represented by the Litigation Division, and Circle K, appear before the Commission and together stipulate that:

1. Circle K owns and operate a gasoline dispensing station at 1500 George Dieter Drive in El Paso, El Paso County, Texas (the "Facility").
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 and TCEQ rules.
3. The Commission and Circle K agree that the Commission has jurisdiction to enter this Agreed Order, and that Circle K is subject to the Commission's jurisdiction.
4. Circle K received notice of the violations alleged in Section II ("Allegations") on or about August 5, 2006.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Circle K of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of one thousand dollars (\$1,000.00) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Circle K has paid one thousand dollars (\$1,000.00) of the administrative 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 Circle K have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
9. 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 Circle K has not complied with one or more of the terms or conditions in this Agreed Order.
10. 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.
11. 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

Circle K is alleged to have violated 30 TEX. ADMIN. CODE § 115.252(2) and TEX. HEALTH & SAFETY CODE § 382.085(b), by failing to comply with the maximum 7.0 pounds per square inch absolute ("psia") Reid Vapor Pressure ("RVP") requirements during the control period of June 1, 2006 through September 16, 2006. Specifically, a sample of premium grade gasoline with a reading of 7.38 psia was taken from pump number two, as documented on June 5, 2006.

## III. DENIALS

Circle K generally denies each allegation in Section II ("Allegations").

## IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Circle K pay an administrative penalty as set forth in Section I, Paragraph 6, above. The payment of this administrative penalty and Circle K'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

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: Circle K Stores, Inc., Docket No. 2006-1312-AIR" 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. Circle K shall undertake the following technical requirements:
  - a. Within 30 days after the effective date of this Agreed Order, Circle K shall establish and implement a process which will ensure the RVP for gasoline dispensed between June 1<sup>st</sup> and September 16<sup>th</sup> of each year shall not exceed 7.0 psia at the Station; and
  - b. Within 45 days after the effective date of this Agreed Order, Circle K shall submit written certification and detailed supporting documentation, including photographs, receipts, and other records, to demonstrate compliance with Ordering Provision No. 2.a. The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that 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 fine and imprisonment for knowing violations."

Circle K shall submit the written certification and copies of documentation necessary to demonstrate compliance with Ordering Provision No. 2.a. to:

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

and

Kevin Smith, Air Section Manager  
Texas Commission on Environmental Quality  
El Paso Regional Office  
401 E. Franklin Ave., Suite 560  
El Paso, Texas 79901-1206

3. The provisions of this Agreed Order shall apply to and be binding upon Circle K. Circle K is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
4. If Circle K fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, Circle K's failure to comply is not a violation of this Agreed Order. Circle K shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Circle K shall notify the Executive Director within seven days after Circle K becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
5. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by Circle K shall be made in writing to the Executive Director. Extensions are not effective until Circle K receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
6. This Agreed Order, issued by the Commission, shall not be admissible against Circle K 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.
7. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be

transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.

8. Under 30 TEX. ADMIN. CODE § 70.10(b) and TEX. GOV'T. CODE § 2001.142, the effective date of this Agreed Order is the date of hand-delivery of the Order to Circle K, or three days after the date on which the Commission mails notice of the Order to Circle K, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

Circle K Stores, Inc.  
DOCKET NO. 2006-1312-E  
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SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

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

*Burgeron Penlue*

\_\_\_\_\_  
For the Executive Director

2/27/08

\_\_\_\_\_  
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 Circle K's failure to timely pay the penalty amount, may result in:

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

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

*Theresa A. Denney*  
\_\_\_\_\_  
Signature

1/14/2008  
\_\_\_\_\_  
Date

*Theresa A. Denney*  
\_\_\_\_\_  
Name (Printed or typed)  
Authorized representative of  
Circle K Stores, Inc.

*Fuel Distribution Supervisor*  
\_\_\_\_\_  
Title