

EXECUTIVE SUMMARY – ENFORCEMENT MATTER – CASE NO. 60850
Ammar Al-Tal dba Spring Time Stop
RN102256278
Docket No. 2021-0792-PST-E

Page 1 of 2

Order Type:
Agreed Order

Media:
PST

Small Business
Yes

Location Where Violations Occurred:
404 North Commerce Street, Bremond, Robertson County

Type of Operation:
an underground storage tank ("UST") system and a convenience store with retail sales of gasoline

Other Significant Matters:

Additional Pending Enforcement Actions:	None
Past-Due Penalties:	None
Past-Due Fees:	None
Other:	None
Interested Third-Parties:	None

Texas Register Publication Date: August 29, 2025

Comments Received: None

Penalty Information

Total Penalty Assessed: \$32,894

Total Paid to General Revenue: \$939

Total Due to General Revenue: \$31,955

Payment Plan: 35 monthly payments of \$913

Compliance History Classifications:

Person - High
Site - High

Major Source: No

Statutory Limit Adjustment: None

Applicable Penalty Policy: January 28, 2021

Investigation Information

Complaint Date: N/A

Date of Investigation: January 21, 2021

Date of NOV: N/A

Date of NOE: May 11, 2021

Violation Information

1. Failed to have the cathodic protection system inspected and tested for operability and adequacy of protection at a frequency of at least every three years [TEX. WATER CODE § 26.3475(d) and 30 TEX. ADMIN. CODE § 334.49(c)(4)(C)].
2. Failed to report suspected releases to the TCEQ within 72 hours of discovery [30 TEX. ADMIN. CODE §§ 334.50(d)(9)(A)(v) and 334.72].
3. Failed to investigate and confirm all suspected releases of regulated substances requiring reporting under 30 TEX. ADMIN. CODE § 334.72 to the TCEQ within 30 days [30 TEX. ADMIN. CODE § 334.74].

Corrective Actions/Technical Requirements

Corrective Action Completed:

Respondent conducted triennial inspection of the cathodic protection system on January 23, 2021.

Technical Requirements:

1. Within 30 days:
 - a. Develop and implement procedures to report suspected releases to the TCEQ timely; and
 - b. Conduct an investigation of the suspected releases and implement appropriate corrective measures.
2. Within 45 days submit written certification to demonstrate compliance with Technical Requirement No. 1.

Litigation Information

Date Petitions Filed: December 8, 2023; December 16, 2024
Dates of Service: December 13, 2023; December 18, 2024
Date Answer Filed: December 19, 2023
SOAH Referral Date: September 10, 2024
Hearing Dates:
Preliminary hearing: November 14, 2024
Evidentiary hearing: July 29, 2025
Settlement Date: July 17, 2025

Contact Information

TCEQ Attorneys: David Keagle, Litigation Division, (512) 239-3400
Eli Martinez, Public Interest Counsel, (512) 239-6363

TCEQ Litigation Agenda Coordinator: Katherine McKenzie, Litigation Division, (512) 239-2575

TCEQ Enforcement Coordinator: Amy Lane, Enforcement Division, (512) 239-5100

TCEQ Regional Contact: Jason Neumann, Waco Regional Office, (254) 751-0335

Respondent Contact: Ammar Al-Tal, 404 North Commerce Street, Bremond, Texas 76629-4640

Respondent's Attorney: Travis J. Garney, 307 N. Center Street, P.O. Box 1288, Franklin, Texas 77856



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	17-May-2021	Screening	27-May-2021	EPA Due	
	PCW	27-May-2025				

RESPONDENT/FACILITY INFORMATION

Respondent	AmmarAl-Tal dba Spring time Stop				
Reg. Ent. Ref. No.	RN102256278				
Facility/Site Region	9-Waco	Major/Minor Source	Minor		

CASE INFORMATION

Enf./Case ID No.	60850	No. of Violations	3
Docket No.	2021-0792-PST-E	Order Type	1660
Media Program(s)	Petroleum Storage Tank	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Amy Lane
		EC's Team	Enforcement Team 3
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$37,500
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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	-\$3,750
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Notes Reduction for High Performer Classification.

Culpability	No	0.0%	Enhancement	Subtotal 4	\$0
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Notes The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$937
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts \$603
Estimated Cost of Compliance \$2,475
*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$32,813
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.2%	Adjustment	\$81
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes Enhancement to capture the avoided costs of compliance associated with Violation No. 2.

Final Penalty Amount	\$32,894
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$32,894
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DEFERRAL	0.0%	Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes Deferral not offered for non-expedited settlement.

PAYABLE PENALTY	\$32,894
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Screening Date	27-May-2021	Docket No.	2021-0792-PST-E	PCW
Respondent	AmmarAl-Tal dba Spring time Stop			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	60850			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN102256278			
Media	Petroleum Storage Tank			
Enf. Coordinator	Amy Lane			

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	27-May-2021	Docket No.	2021-0792-PST-E	PCW
Respondent	AmmarAl-Tal dba Spring time Stop	<i>Policy Revision 5 (January 28, 2021)</i>		
Case ID No.	60850	<i>PCW Revision February 11, 2021</i>		
Reg. Ent. Reference No.	RN102256278			
Media	Petroleum Storage Tank			
Enf. Coordinator	Amy Lane			
Violation Number	1			
Rule Cite(s)	30 Tex. Admin. Code § 334.49(c)(4)(C) and Tex. Water Code § 26.3475(d)			
Violation Description	Failed to have the cathodic protection system inspected and tested for operability and adequacy of protection at a frequency of at least once every three years. Specifically, the triennial testing of the cathodic protection system was not conducted by the January 15, 2021 testing due date.			
Base Penalty				\$25,000
>> Environmental, Property and Human Health Matrix				
OR	Harm			
	Major	Moderate	Minor	
	Actual	Potential		
	x			Percent 15.0%
>> Programmatic Matrix				
	Falsification	Major	Moderate	Minor
				Percent 0.0%
Matrix Notes	Human health or the environment will or could be exposed to pollutants that would exceed levels that are protective of human health or environmental receptors as a result of the violation.			
Adjustment				\$21,250
				\$3,750
Violation Events				
Number of Violation Events		1	Number of violation days	
		8		
	daily			
	weekly			
	monthly			
	quarterly			
	semiannual			
	annual			
	single event	x		
Violation Base Penalty		\$3,750		
One single event is recommended.				
Good Faith Efforts to Comply		25.0%	Reduction \$937	
		Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer		
	Extraordinary			
	Ordinary	x		
	N/A			
Notes	The Respondent came into compliance on January 23, 2021, prior to the May 11, 2021 Notice of Enforcement ("NOE").			
Violation Subtotal				\$2,813
Economic Benefit (EB) for this violation		Statutory Limit Test		
Estimated EB Amount		\$1	Violation Final Penalty Total \$2,444	
This violation Final Assessed Penalty (adjusted for limits)				\$2,444

Economic Benefit Worksheet

Respondent AmmarAl-Tal dba Spring time Stop
Case ID No. 60850
Reg. Ent. Reference No. RN102256278
Media 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	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	\$500	15-Jan-2021	23-Jan-2021	0.02	\$1	n/a	\$1
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated delayed cost to conduct the triennial testing of the cathodic protection system at the Facility.
The Date Required is the date the test was due, and the Final Date is the 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

\$500

TOTAL

\$1

Screening Date 27-May-2021 Respondent AmmarAl-Tal dba Spring time Stop Case ID No. 60850 Reg. Ent. Reference No. RN102256278 Media Petroleum Storage Tank Enf. Coordinator Amy Lane	Docket No. 2021-0792-PST-E	PCW <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>
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Violation Number	2	Rule Cite(s)	
		30 Tex. Admin. Code §§ 334.50(d)(9)(A)(v) and 334.72	
Violation Description	Failed to report a suspected release to the TCEQ within 72 hours of discovery. Specifically, the statistical inventory reconciliation ("SIR") analyses for the premium and diesel tanks from July 2019 to November 2020 indicated suspected releases due to "Inconclusive" results that was not reported. Also, failed to report a suspected release to the TCEQ within 24 hours of discovery. Specifically, inventory control ("IC") records for the unleaded tank from July 2020 and August 2020 indicated a suspected release that was not reported.		
Base Penalty		\$25,000	

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual				
	Potential				
					0.0%

>> Programmatic Matrix

OR	Falsification	Major	Moderate	Minor	Percent
		x			
					10.0%

Matrix Notes	100% of the rule requirement was not met.
Adjustment	
\$22,500	

Adjustment		\$2,500
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Violation Events

Number of Violation Events	3	648	Number of violation days
daily			
weekly			
monthly			
quarterly			
semiannual			
annual			
single event	x		
Violation Base Penalty			
\$7,500			

Three single events are recommended, one for each tank with a suspected release.	
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Good Faith Efforts to Comply

0.0%	Reduction
	\$0
Extraordinary	
Ordinary	
N/A	x
Notes	The Respondent does not meet the good faith criteria for this violation.
Violation Subtotal	
\$7,500	

Economic Benefit (EB) for this violation

Estimated EB Amount	\$107	Statutory Limit Test	
		Violation Final Penalty Total	\$6,767
This violation Final Assessed Penalty (adjusted for limits)		\$6,767	

Economic Benefit Worksheet

Respondent AmmarAl-Tal dba Spring time Stop
Case ID No. 60850
Reg. Ent. Reference No. RN102256278
Media 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	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				0.00	\$0	n/a	\$0
Other (as needed)	\$100	21-Jan-2021	13-Mar-2026	5.14	\$26	n/a	\$26

Notes for DELAYED costs

Estimated delayed cost to implement procedures to report suspected releases timely. The Date Required is the investigation date, and the 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
Suspected Release Reports for the Premium and Diesel Tanks	\$50	18-Aug-2019	27-May-2021	1.78	\$5	\$50	\$55
Suspected Release Report for the Unleaded Tank	\$25	1-Sep-2020	27-May-2021	0.73	\$1	\$25	\$26

Notes for AVOIDED costs

Estimated avoided costs to report suspected releases (\$25 per tank with a suspected release). The Dates Required are the dates the suspected releases should have been reported, and the Final Dates are the screening date.

Approx. Cost of Compliance

\$175

TOTAL

\$107

Screening Date 27-May-2021 Respondent AmmarAl-Tal dba Spring time Stop Case ID No. 60850 Reg. Ent. Reference No. RN102256278 Media Petroleum Storage Tank Enf. Coordinator Amy Lane	Docket No. 2021-0792-PST-E	PCW <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>			
Violation Number 3					
Rule Cite(s) 30 Tex. Admin. Code § 334.74					
Violation Description Failed to investigate and confirm all suspected releases of regulated substances requiring reporting under 30 Tex. Admin. Code § 334.72 (relating to Reporting of Suspected Releases) within 30 days. Specifically, the SIR analyses for the premium and diesel tanks from July 2019 to November 2020 indicated suspected releases due to "Inconclusive" results that were not investigated. Also, IC records for the unleaded tank from July 2020 and August 2020 indicated a suspected release that was not investigated. 					
Base Penalty		\$25,000			
>> Environmental, Property and Human Health Matrix					
OR	Release	Harm			
		Major Moderate Minor			
	Actual				Percent 15.0%
Potential	x				
>> Programmatic Matrix					
	Falsification	Major	Moderate	Minor	
					Percent 0.0%
Matrix Notes	Human health or the environment will or could be exposed to pollutants that would exceed levels that are protective of human health or environmental receptors as a result of the violation.				
Adjustment					\$21,250
					\$3,750
Violation Events					
Number of Violation Events		7	Number of violation days		621
	daily				
	weekly				
	monthly				
	quarterly	x			
	semiannual				
	annual				
	single event				
Violation Base Penalty		\$26,250			
Seven quarterly events are recommended from the September 14, 2019 earliest suspected release investigation due date to the May 27, 2021 screening date.					
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.			
Violation Subtotal					\$26,250
Economic Benefit (EB) for this violation			Statutory Limit Test		
Estimated EB Amount		\$495	Violation Final Penalty Total		\$23,683
This violation Final Assessed Penalty (adjusted for limits)					\$23,683

Economic Benefit Worksheet

Respondent AmmarAl-Tal dba Spring time Stop
Case ID No. 60850
Reg. Ent. Reference No. RN102256278
Media 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	Costs Saved	EB Amount
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				0.00	\$0	n/a	\$0
Other (as needed)	\$1,800	14-Sep-2020	13-Mar-2026	5.50	\$495	n/a	\$495
Notes for DELAYED costs	Estimated delayed cost to conduct an investigation of the suspected release and implement appropriate corrective measures.[\$400 for testing (tank plus line) per tank, and \$600 for Release Determination Report], at the Facility. The Date Required is the date the earliest suspected release investigation was due, and the 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	\$1,800				TOTAL	\$495	



Compliance History Report

Compliance History Report for CN602648032, RN102256278, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respondent, or Owner/Operator:	CN602648032, Ammar Al-Tal	Classification:	HIGH	Rating:	0.00
Regulated Entity:	RN102256278, Spring Time Stop	Classification:	HIGH	Rating:	0.00
Complexity Points:	3	Repeat Violator:	NO		
CH Group:	14 - Other				
Location:	404 NORTH COMMERCE STREET IN BREMOND, ROBERTSON COUNTY, TEXAS 76629-4640				
TCEQ Region:	REGION 09 - WACO				
ID Number(s):	PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 4693				
Compliance History Period:	September 01, 2015 to August 31, 2020	Rating Year:	2020	Rating Date:	09/01/2020
Date Compliance History Report Prepared:	June 04, 2021				
Agency Decision Requiring Compliance History:	Enforcement				
Component Period Selected:	June 04, 2016 to June 04, 2021				
TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.					
Name:	John Fennell		Phone:	(512) 239-2616	

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 January 23, 2018 (1465633)

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
AMMAR AL-TAL DBA SPRING TIME
STOP;
RN102256278

§
§
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§
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BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

AGREED ORDER

DOCKET NO. 2021-0792-PST-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Ammar Al-Tal dba Spring Time Stop ("Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, represented by the Litigation Division, and Respondent, represented by Travis J. Garney of the law firm Palmos, Russ, McCullough & Russ LLP, together stipulate that:

1. Respondent owns and operates, as defined in 30 TEX. ADMIN. CODE § 334.2, a underground storage tank ("UST") system and a convenience store with retail sales of gasoline located at 404 North Commerce Street in Bremond, Robertson County, Texas (Facility ID No. 4693) (the "Facility"). The USTs at the Facility are not exempt or excluded from regulation under the Texas Water Code or the rules of the Commission, and contain a regulated petroleum substance as defined in the rules of the TCEQ.
2. The Executive Director and Respondent agree that TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that 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 Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
4. An administrative penalty in the amount of \$32,894 is assessed by the Commission in settlement of the violations alleged in Section II. Respondent paid \$939 of the penalty. The remaining amount of \$31,955 shall be paid in 35 monthly payments of \$913 each. The first monthly payment shall be paid within 30 days after the effective date of this Order. The subsequent payments shall each be paid not later than 30 days following the due date of the previous payment until the penalty is paid in full. If Respondent fails to timely and satisfactorily comply with the payment requirements of this Order, including the payment schedule, the Executive Director may, at her 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, Respondent's failure to meet the payment schedule of this Order and/or the acceleration of any remaining balance constitutes the failure by Respondent to timely and satisfactorily comply with all the terms of this Order.
5. The Executive Director and Respondent agree on a settlement of the matters addressed in this Order, 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 Respondent has not complied with one or more of the terms or conditions contained 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 full compliance with all the terms and conditions set forth in this Order, whichever is later.
9. The Executive Director recognizes that Respondent conducted triennial inspection of the cathodic protection system on January 23, 2021.

II. ALLEGATIONS

1. During an investigation conducted on January 21, 2021, an investigator documented that Respondent:
 - a. Failed to have the cathodic protection system inspected and tested for operability and adequacy of protection at a frequency of at least every three years, in violation of TEX. WATER CODE § 26.3475(d) and 30 TEX. ADMIN. CODE § 334.49(c)(4)(C). Specifically, the triennial testing of the cathodic protection system was not conducted by the January 15, 2021, testing due date;
 - b. Failed to report a suspected release to the TCEQ within 72 hours of discovery, in violation of 30 TEX. ADMIN. CODE §§ 334.50(d)(9)(A)(v) and 334.72. Specifically, the statistical inventory reconciliation ("SIR") analyses for the premium and diesel tanks from July 2019 to November 2020 indicated suspected releases due to "Inconclusive" results that were not reported. Respondent also failed to report a suspected release to the TCEQ within 24 hours of discovery, in violation of 30 TEX. ADMIN. CODE § 334.72. Specifically, inventory control ("IC") records for the unleaded tank from July 2020 and August 2020 indicated a suspected release that was not reported; and
 - c. Failed to investigate and confirm all suspected releases of regulated substances requiring reporting under 30 TEX. ADMIN. CODE § 334.72 (relating to Reporting of Suspected Releases) to the TCEQ within 30 days, in violation of 30 TEX. ADMIN. CODE § 334.74. Specifically, the SIR analysis for the premium and diesel tanks from July 2019 to November 2020 indicated suspected releases due to 'inconclusive' results which were not investigated. Also, IC records for the unleaded tank from July 2020 and August 2020 indicated a suspected release that was not investigated.

III. DENIALS

Respondent generally denies each Allegation in Section II.

IV. ORDERING PROVISIONS

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

1. Respondent is assessed an administrative penalty as set forth in Section I, Paragraph 4. The payment of this penalty and 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 actions 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: Ammar Al-Tal dba Spring Time Stop, Docket No. 2021-0792-PST-E" to:

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

2. Respondent shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Order:
 - i. Develop and implement procedures to report suspected releases to the TCEQ timely, in accordance with 30 TEX. ADMIN. CODE §§ 334.50 and 334.72; and
 - ii. Conduct an investigation of the suspected releases and implement appropriate corrective measures, in accordance with 30 TEX. ADMIN. CODE § 334.74.
 - b. Within 45 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a. 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:

Waste Section Manager
Waco Regional Office
Texas Commission on Environmental Quality
6801 Sanger Avenue, Suite 2500
Waco, Texas 76710-7826

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 Respondent. 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 Respondent shall be made in writing to the Executive Director. Extensions are not effective until

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.

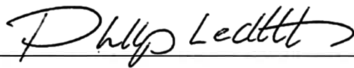
6. If Respondent fails to comply with any of the Ordering Provisions in this Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, Respondent's failure to comply is not a violation of this Order. Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Respondent shall notify the Executive Director within seven days after Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
7. This Order, issued by the Commission, shall not be admissible against 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 TCEQ's jurisdiction or of a rule adopted or an order or permit issued by the TCEQ under such a statute.
8. 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.
9. 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



September 8, 2025

For the Executive Director

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 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;
- Referral of this case to the Attorney General's office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

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



7/17/25

Signature - Ammar Al-Tal, Owner
Ammar Al-Tal dba Spring Time Stop
404 North Commerce Street
Bremond, Texas 76629-4640

Date

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