Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

PST

Small Business:

Yes

Location(s) Where Violation(s) Occurred:

Snappy Foods 6, 811 Voss Avenue, Odem, San Patricio County ("Facility No. 1") Snappy Foods 24, 809 South Alamo Street, Refugio, Refugio County ("Facility No. 2")

Type of Operation:

Underground storage tank ("UST") systems and convenience stores with retail sales of gasoline

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: April 22, 2022

Comments Received: No

Penalty Information

Total Penalty Assessed: \$10,468

Amount Deferred for Expedited Settlement: \$2,092

Total Paid to General Revenue: \$256
Total Due to General Revenue: \$8,120
Payment Plan: 35 payments of \$232 each

Compliance History Classifications (RN101902054):

Person/CN - Satisfactory Site/RN - Satisfactory

Compliance History Classifications (RN108193590):

Person/CN - Satisfactory

Site/RN - High **Major Source:** No

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: May 27, 2021

Date(s) of NOE(s): July 22, 2021 and July 23, 2021

Violation Information

At Facility 1:

- 1. Failed to provide release detection for the pressurized piping associated with the UST system. Specifically, the Respondent had not conducted the annual line leak detector and piping tightness tests [30 Tex. Admin. Code § 334.50(b)(2) and Tex. Water Code § 26.3475(a)].
- 2. Failed to ensure that all installed spill and overfill prevention devices are maintained in good operating condition. Specifically, the spill buckets for the super unleaded gasoline and diesel fuel compartments of UST No. 2 at the Facility were cracked [30 Tex. Admin. Code §§ 334.48(d) and 334.51(a)(6) and Tex. Water Code § 26.3475(c)(2)].
- 3. Failed to equip each UST with a valve or other appropriate device designed to automatically shut off the flow of regulated substances into the tank when the liquid level in the tank reaches no higher than 95% capacity level for the tank. Specifically, the diesel fuel compartment of UST No. 2 was not equipped with overfill prevention equipment [30 Tex. Admin. Code § 334.51(b)(2)(C)(i) and Tex. Water Code § 26.3475(c)(2)].
- 4. Failed to assure that all UST recordkeeping requirements are met. Specifically, tank release detection records and periodic operation and maintenance inspection records of the Facility's UST system were not available for inspection at the time of the investigation [30 Tex. Admin. Code § 334.10(b)(2)].

At Facility 2:

5. Failed to monitor the UST for releases in a manner which will detect a release at a frequency of at least once every 30 days by using interstitial monitoring for tanks installed on or after January 1, 2009. Specifically, the UST was installed on June 11, 2015 and the Respondent was not monitoring it using interstitial monitoring [30 Tex. ADMIN. CODE §§ 334.45(d)(1)(E)(iii) and 334.50(b)(1)(B) and Tex. WATER CODE § 26.3475(c)(1)].

- 6. Failed to provide release detection for the pressurized piping associated with the UST system. Specifically, the Respondent had not conducted the annual line leak detector and piping tightness tests [30 Tex. Admin. Code § 334.50(b)(2) and Tex. Water Code § 26.3475(a)].
- 7. Failed to equip the UST with a valve or other appropriate device designed to automatically shut off the flow of regulated substances into the tank when the liquid level in the tank reaches no higher than 95% capacity level for the tank. Specifically, the UST compartments were not equipped with overfill prevention equipment [30 Tex. ADMIN. CODE § 334.51(b)(2)(C)(i) and Tex. WATER CODE § 26.3475(c)(2)].
- 8. Failed to assure that all UST recordkeeping requirements are met. Specifically, periodic operation and maintenance inspection records of the Facility's UST system were not available for inspection at the time of the investigation [30 Tex. Admin. Code § 334.10(b)(2)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent conducted the annual line leak detector and piping tightness tests at Facility No. 1 on December 9, 2021, and Facility No. 2 on November 8, 2021, with passing results.

Technical Requirements:

The Order will require the Respondent to, for Facility 1:

- a. Immediately, begin maintaining UST records, including, but not limited to, tank release detection and periodic operation and maintenance inspection records, and make them immediately available for inspection upon request by agency personnel.
- b. Within 30 days:
- i. Replace the spill buckets for the super unleaded gasoline and diesel fuel compartments of UST No. 2; and
- ii. Install overfill prevention equipment for the diesel fuel compartment of UST No. 2.

The Order will require the Respondent to, for Facility 2:

c. Immediately, begin maintaining UST records, including, but not limited to, periodic operation and maintenance inspection records, and make them immediately available for inspection upon request by agency personnel.

- d. Within 30 days:
- i. Implement interstitial monitoring release detection method for the UST; and
- ii. Install overfill prevention equipment for all UST compartments.
- e. Within 45 days, submit written certification to demonstrate compliance with a., b., c., and d.

Contact Information

TCEQ Attorney: N/A

TCEO Enforcement Coordinator: Karolyn Kent, Enforcement Division,

Enforcement Team 6, MC 219, (512) 239-2536; Michael Parrish, Enforcement Division,

MC 219, (512) 239-2548

Respondent: Agha S. Ali, Director, EMROOZ, Inc., P.O. Box 3696, Corpus Christi,

Texas 78463-3696

Respondent's Attorney: N/A

Penalty Calculation Worksheet (PCW) Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021 **DATES** Assigned 26-Jul-2021 Screening 5-Aug-2021 PCW 9-Aug-2021 **EPA Due RESPONDENT/FACILITY INFORMATION** Respondent EMROOZ, Inc. dba Snappy Foods 6 Reg. Ent. Ref. No. RN101902054 Facility/Site Region 14-Corpus Christi Major/Minor Source Minor **CASE INFORMATION Enf./Case ID No.** 61150 No. of Violations 3 **Docket No.** 2021-1040-PST-E Order Type 1660 Media Program(s) Petroleum Storage Tank **Government/Non-Profit No** Multi-Media Enf. Coordinator Karolyn Kent EC's Team Enforcement Team 6 \$25,000 Admin. Penalty \$ Limit Minimum \$0 Maximum

			Penalty	Calculat	tion Section	on		
TOTA	L BASE PENA	LTY (Sum of	f violation ba	se penalt	ies)		Subtotal 1	\$5,250
ADJU:	STMENTS (+	/-) TO SUBT	OTAL 1					
	Subtotals 2-7 are of	btained by multiplyin	g the Total Base Pena					+105
	Compliance Hi	story		2.0%	Adjustment	Subto	tals 2, 3, & 7	\$105
	Notes	Enha	ncement for one I	NOV with dis	similar violatio	ns.		
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	The Re	espondent does n	ot meet the	culpability crite	eria.		
	Good Faith Eff	ort to Comply 1	Total Adjustmen	its			Subtotal 5	-\$375
			-					
	Economic Ben				Enhancement*		Subtotal 6	\$0
	Estimated	Total EB Amounts d Cost of Compliance		*Capped	d at the Total EB \$ /	Amount		
SUM (OF SUBTOTA	LS 1-7				ŀ	inal Subtotal	\$4,980
	R FACTORS A		MAY REQUIRE cated percentage.		2.4%		Adjustment	\$119
	Notes	Enhancement t	o capture the avo Viola	oided cost of ation No. 1.	compliance ass	sociated with		
						Final Pe	nalty Amount	\$5,099
STATI	UTORY LIMIT	F ADJUSTME	NT			Final Asse	essed Penalty	\$5,099
DEFEI Reduces t	RRAL the Final Assessed Pe	enalty by the indicate	d percentage.		20.0%	Reduction	Adjustment	-\$1,019
	Notes		Deferral offered f	or expedited	i settlement.			
PAYA	BLE PENALT	Υ						\$4,080

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

Docket No. 2021-1040-PST-E

Respondent EMROOZ, Inc. dba Snappy Foods 6

Case ID No. 61150

Reg. Ent. Reference No. RN101902054

Media Petroleum Storage Tank

Enf. Coordinator Karolyn Kent

Compliance His	Compliance History Worksheet tory 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 (number of NOVs meeting criteria)	0	0%
	Other written NOVs	1	2%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	0	0%
Orders	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	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
Decrees	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 Any criminal convictions of this state or the federal government (number of	0	0%
Convictions	0	0%	
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
Addits	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%
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
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 Per	centage (Sub	ototal 2)
Repeat Violator	(Subtotal 3)		
No	Adjustment Pero	centage (Sub	ototal 3)
Compliance His	tory Person Classification (Subtotal 7)		
Satisfactory	Performer Adjustment Pero	centage (Sub	ototal 7)
Compliance Hist	tory Summary		
Compliance History Notes	Enhancement for one NOV with dissimilar violations.		
	Total Compliance History Adjustment Percentage (S	Subtotals 2,	3, & 7)
inal Compliance	History Adjustment		

	PCW
Respondent EMROOZ, Inc. dba Snappy Foods 6 Policy Revision	n 5 (January 28, 2021)
Case ID No. 61150	sion February 11, 2021
Reg. Ent. Reference No. RN101902054	
Media Petroleum Storage Tank	
Enf. Coordinator Karolyn Kent	
Violation Number 1	
Rule Cite(s)	
30 Tex. Admin. Code § 334.50(b)(2) and Tex. Water Code § 26.3475(a)	
Failed to provide release detection for the pressurized piping associated with the	
Violation Description underground storage tank ("UST") system. Specifically, the Respondent had not	
conducted the annual line leak detector and piping tightness tests.	
Page Page Hy	¢2F 000
Base Penalty	\$25,000
>> Environmental, Property and Human Health Matrix	
Harm	
Release Major Moderate Minor	
OR 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.	
Notes that are protective of human health or environmental receptors as a result of the violation.	
Adjustment \$21,250	
	\$3,750
	\$3,750
Violation Events	\$3,750
	\$3,750
Violation Events Number of Violation Events 1 70 Number of violation days	\$3,750
Number of Violation Events 1 70 Number of violation days	\$3,750
Number of Violation Events 1 70 Number of violation days daily	\$3,750
Number of Violation Events 1 70 Number of violation days daily weekly	\$3,750
Number of Violation Events 1 70 Number of violation days daily	\$3,750 \$3,750
Number of Violation Events 1 70 Number of violation days daily weekly monthly	
Number of Violation Events 1 70 Number of violation days daily weekly monthly quarterly semiannual annual	
Number of Violation Events 1 70 Number of violation days daily weekly monthly quarterly semiannual Violation Base Penalty	
Number of Violation Events 1 70 Number of violation days daily weekly monthly quarterly semiannual annual	
Number of Violation Events daily weekly monthly quarterly semiannual annual single event X	
Number of Violation Events 1 70 Number of violation days daily weekly monthly quarterly semiannual annual	
Number of Violation Events 1 70 Number of violation days daily weekly monthly quarterly semiannual annual single event X One single event is recommended.	\$3,750
Number of Violation Events 1 70 Number of violation days daily weekly monthly quarterly semiannual annual single event X One single event is recommended. Good Faith Efforts to Comply 10.0% Reduction	
Number of Violation Events 1 70 Number of violation days daily weekly monthly quarterly semiannual annual single event X One single event is recommended. Good Faith Efforts to Comply 10.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer	\$3,750
Number of Violation Events 1 70 Number of violation days daily weekly monthly quarterly semiannual annual single event X One single event is recommended. Good Faith Efforts to Comply 10.0% Reduction Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary	\$3,750
Number of Violation Events 1 70 Number of violation days daily weekly monthly quarterly semiannual annual single event X One single event is recommended. Good Faith Efforts to Comply 10.0% Reduction Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary X	\$3,750
daily weekly monthly quarterly semiannual annual single event X One single event X One single event Sefore NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary X N/A Ordinary X Ord	\$3,750
Number of Violation Events 1 70 Number of violation days daily weekly monthly quarterly semiannual annual single event X One single event is recommended. Good Faith Efforts to Comply 10.0% Reduction Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary X The Respondent came into compliance by conducting the annual line leak detector and pining tightness tests	\$3,750
Number of Violation Events daily weekly monthly quarterly weininnual semiannual single event X One single event x	\$3,750
Number of Violation Events 1 70 Number of violation days daily weekly monthly quarterly semiannual annual single event X One single event is recommended. Good Faith Efforts to Comply 10.0% Reduction Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary X Ordinary X The Respondent came into compliance by conducting the annual line leak detector and pining tightness tests	\$3,750
Adaily weekly monthly quarterly semiannual annual single event X One single event is recommended. Cone single event is recommended. Cone single event is recommended. Cone single event is recommended. Reduction Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary X N/A The Respondent came into compliance by conducting the annual line leak detector and piping tightness tests on December 9, 2021, after the July 22, 2021 Notice of Enforcement date.	\$3,750 \$375
Adaily weekly monthly quarterly semiannual annual single event X One single event is recommended. Concession and a single event of the second annual second a	\$3,750
Adaily weekly monthly quarterly semiannual annual single event X One single event is recommended. Cone single event is recommended. Cone single event is recommended. Cone single event is recommended. Reduction Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary X N/A The Respondent came into compliance by conducting the annual line leak detector and piping tightness tests on December 9, 2021, after the July 22, 2021 Notice of Enforcement date.	\$3,750 \$375
Adaily weekly monthly quarterly semiannual annual single event One single event is recommended. Comply	\$3,750 \$375 \$3,375
Adaily weekly monthly quarterly semiannual annual single event X One single event is recommended. One single event of violation days Violation Base Penalty Semiannual single event of the semiannual single event of	\$3,750 \$375

	E	conomic	Benefit	Woi	rksheet		
Respondent	EMROOZ, Inc.	dba Snappy Food	s 6				
Case ID No.		117					
Reg. Ent. Reference No.							
	Petroleum Sto						Years of
		raye rank				Percent Interest	Depreciation
Violation No.	1						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
200 2 000							
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	\$118	27-May-2021	9-Dec-2021	0.54	\$3	n/a	\$3
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		Required is the in	vestigation date	e, and th	ne Final Date is the	oiping tightness test e date of compliance	2.
Avoided Costs	ANNUA	LIZE avoided co	osts before er	tering		one-time avoided	d 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	\$118	27-May-2021	5-Aug-2021	0.19	\$1	\$118	\$119
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs	Estimated				•	oiping tightness test he screening date.	s. The Date
Approx. Cost of Compliance		\$236			TOTAL		\$122

Scree	ning Date	5-Aug-2021		Docke	t No. 2021-1040-PST-E		PCW
Re	espondent [EMROOZ, Inc.	dba Snappy Fo	oods 6		Policy R	evision 5 (January 28, 2021)
Ca	ase ID No. 6	61150				PCW	Revision February 11, 2021
Reg. Ent. Refe	rence No.	RN101902054					
	Media F	Petroleum Stor	age Tank				
Enf. Co	ordinator	Karolyn Kent	_				
	ion Number	2					
	Rule Cite(s)	30 Tex. Admin	i. Code §§ 334	• • •)(6), and (b)(2)(C)(i) and	Tex. Water	
		Eailad ta angur	o that all insta	Code § 26.347	5(c)(2) rfill prevention devices are	maintained	
					spill buckets for the supe		
			_		T No. 2 at the Facility wer		
Violation	Description	~		•	other appropriate device		
Violation	Description	•		_	bstances into the tank wh		
				•	95% capacity level for the		
		Specifically,		er compartment overfill prevention	f UST No. 2 was not equip	pea with	
	L		0.	vernii prevention	ечиртенс.		
					Ва	se Penalty	\$25,000
	t-1 D		IIIAI-				
>> Environmen	tai, Proper	ty and Hun	nan Healtn Harm	Matrix			
	Release_	Major	Moderate	Minor			
OR	Actual					_	
	Potential		X		Percent 5.0%	6	
>	ic Matrix						
>>Programmat	Falsification	Major	Moderate	Minor			
	Taisincation	Мајог	Moderate	1411101	Percent 0.09	6	
					0107	<u> </u>	
Motaix	Human healt	h or the enviro	nment will or	could be exposed	to significant amounts of	pollutants	
Matrix Notes	that would not	exceed levels	•		ealth or environmental red	ceptors as a	
Notes			resul	t of the violation.			
					Adjustment	¢22 750	
					Adjustment	\$23,750	
					Adjustment	\$23,750	\$1,250
Violation Events					Adjustment	\$23,750	\$1,250
Violation Events	5				Adjustment	\$23,750	\$1,250
Violation Events		olation Events	1		Adjustment Number of violation		\$1,250
Violation Events		olation Events	1				\$1,250
Violation Events		daily	1				\$1,250
Violation Events		daily weekly	1				\$1,250
Violation Events		daily weekly monthly	1 V		70 Number of violation	n days	
Violation Events		daily weekly	1 X			n days	\$1,250 \$1,250
Violation Events		daily weekly monthly quarterly	1 X		70 Number of violation	n days	
Violation Events		daily weekly monthly quarterly semiannual	1 X		70 Number of violation	n days	
	Number of Vi	daily weekly monthly quarterly semiannual annual single event	X		70 Number of violation Ba	n days	
	Number of Vi	daily weekly monthly quarterly semiannual annual single event	X X		70 Number of violation	n days	
	Number of Vi	daily weekly monthly quarterly semiannual annual single event	X X	the May 27, 202 screening date.	70 Number of violation Ba	n days	
	Number of Vi	daily weekly monthly quarterly semiannual annual single event	X nmended from 2021		70 Number of violation Ba	n days se Penalty e August 5,	\$1,250
	Number of Vi	daily weekly monthly quarterly semiannual annual single event	X nmended from 2021 0.0%	screening date.	Number of violation Violation Ba	n days	
	Number of Vi	daily weekly monthly quarterly semiannual annual single event event is recom	x nmended from 2021 0.0% Before NOE/NOV	screening date.	Number of violation Violation Ba	n days se Penalty e August 5,	\$1,250
	Number of Vi	daily weekly monthly quarterly semiannual annual single event event is recon	nmended from 2021 0.0% Sefore NOE/NOV	screening date.	Number of violation Violation Ba	n days se Penalty e August 5,	\$1,250
	Number of Vi	daily weekly monthly quarterly semiannual annual single event event is recom	nmended from 2021 0.0% Sefore NOE/NOV	screening date.	Number of violation Violation Ba	n days se Penalty e August 5,	\$1,250
	Number of Vi	daily weekly monthly quarterly semiannual annual single event event is recom Extraordinary Ordinary	nmended from 2021 0.0% Sefore NOE/NOV	NOE/NOV to EDPRP	Number of violation Violation Ba	e August 5, Reduction	\$1,250
	Number of Vi	daily weekly monthly quarterly semiannual annual single event event is recom Extraordinary Ordinary	nmended from 2021 0.0% Sefore NOE/NOV	NOE/NOV to EDPRP	Number of violation Violation Bate 1 investigation date to the Settlement Offer 2 the good faith criteria for	e August 5, Reduction	\$1,250
	Number of Vi	daily weekly monthly quarterly semiannual annual single event event is recon Extraordinary Ordinary N/A	nmended from 2021 0.0% Sefore NOE/NOV	NOE/NOV to EDPRP	Number of violation Violation Bate 1 investigation date to the Settlement Offer 2 the good faith criteria for	e August 5, Reduction	\$1,250
	Number of Vi	daily weekly monthly quarterly semiannual annual single event event is recon Extraordinary Ordinary N/A	nmended from 2021 0.0% Sefore NOE/NOV	NOE/NOV to EDPRP	Violation Bar Vi	e August 5, Reduction	\$1,250
Good Faith Effor	One quarterly	daily weekly monthly quarterly semiannual annual single event event is recon Extraordinary Ordinary N/A Notes	nmended from 2021 0.0% Sefore NOE/NOV X The Respond	NOE/NOV to EDPRP	Violation Base of violation Ba	n days se Penalty August 5, Reduction	\$1,250
	One quarterly	daily weekly monthly quarterly semiannual annual single event event is recon Extraordinary Ordinary N/A Notes	nmended from 2021 0.0% Sefore NOE/NOV X The Respond	NOE/NOV to EDPRP	Violation Bar Vi	n days se Penalty August 5, Reduction	\$1,250
Good Faith Effor	One quarterly rts to Comp	daily weekly monthly quarterly semiannual annual single event event is recon Extraordinary Ordinary N/A Notes	Namended from 2021 O.0% Sefore NOE/NOV X The Respond	NOE/NOV to EDPRP	Violation Base of violation Ba	n days se Penalty August 5, Reduction on Subtotal	\$1,250 \$0 \$1,250
Good Faith Effor	One quarterly rts to Comp	daily weekly monthly quarterly semiannual annual single event event is recon Ply Extraordinary Ordinary N/A Notes this violati	nmended from 2021 O.0% Sefore NOE/NOV X The Respond	NOE/NOV to EDPRP, ent does not mee this viola	Violation Base of violation Ba	e August 5, Reduction on Subtotal oit Test	\$1,250 \$0 \$1,305

	E	conomic	Benefit	Woı	rksheet		
Respondent	EMROOZ, Inc.	dba Snappy Food	ls 6				
Case ID No.	61150						
Reg. Ent. Reference No.	RN101902054						
	Petroleum Sto					Dawasat Intonat	Years of
Violation No.	2					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
200 2 000 p 0							
Delayed Costs							
Equipment	\$2,000	27-May-2021	22-May-2022	0.99	\$7	\$132	\$139
Buildings			•	0.00	\$0	\$0	\$0
Other (as needed)	\$1,500	27-May-2021	22-May-2022	0.99	\$5	\$99	\$104
Engineering/Construction				0.00	\$0	\$0	\$0
Land Record Keeping System				0.00	\$0 \$0	n/a	\$0 \$0
Training/Sampling				0.00	\$0	n/a n/a	\$0
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
		•	•		•	eaded gasoline and rfill prevention equi	
Notes for DELAYED costs		ompartment of US	ST No. 2 (\$1,500)). The	Dates Required ar	e the investigation (-
					ated date of compl		
Avoided Costs	ANNUA	ALIZE avoided c	osts before en			one-time avoided	
Disposal Personnel				0.00	\$0 \$0	\$0 \$0	\$0 #0
Inspection/Reporting/Sampling				0.00	\$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0	\$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							
Į							
Approx. Cost of Compliance		\$3,500			TOTAL		\$243
.,		72,300			. 0 1712		

	Screening Date	5-Aug-2021	Docket No.	2021-1040-PST-E	PCW
	Respondent	EMROOZ, Inc. dba Snappy Food	ls 6		Policy Revision 5 (January 28, 2021)
	Case ID No.	61150			PCW Revision February 11, 2021
Reg.	Ent. Reference No.	RN101902054			
	Media	Petroleum Storage Tank			
	Enf. Coordinator	Karolyn Kent			
	Violation Number	3			
	Rule Cite(s)	30 Tex.	Admin. Code § 334.10)(b)(2)	
		55.5%	7.4	-(-)	
	Violation Description	Failed to assure that all UST red release detection records an records of the Facility's UST sys	d periodic operation a	nd maintenance inspe	ction
				Base	Penalty \$25,000
>> Fn\	ironmental Prope	rty and Human Health M	atrix		
		Harm			
0.0	Release	Major Moderate	Minor		
OR	Actual				
	Potential			Percent 0.0%	
>> Dro	grammatic Matrix				
F10	Falsification	Major Moderate	Minor		
	T G G T G G G G G G G G G G G G G G G G	a.je.		Percent 1.0%	
		1 1			
	Matrix Notes	Less than 30% of the ru	ule requirement was n	ot met.	
			Adi	ustment	\$24,750
					\$250
Violatio	on Events				
	Number of V	iolation Events 1	70	Number of violation da	ays
		daily weekly monthly quarterly semiannual annual single event X		Violation Base	Penalty \$250
		One single eve	ent is recommended.		
Good F	aith Efforts to Com	ply 0.0%		Re	eduction \$0
			E/NOV to EDPRP/Settleme	nt Offer	
		Notes The Respondent	this violation.	ood faith criteria for	
				Violation S	subtotal \$250
Econor	nic Benefit (EB) for	this violation		Statutory Limit 1	Test Test
	Estimate	ed EB Amount	\$2 V	iolation Final Penal	ty Total \$261
		This violati	on Final Assessed D	enalty (adjusted for	limits) \$261
		i ilis violati	on i mai Assesseu P	enaity (aujusteu 101	\$201

	E	conomic	Benefit	Wor	ksheet		
Respondent	EMROOZ, Inc.	dba Snappy Food	ls 6				
Case ID No.		,					
Reg. Ent. Reference No.							
	Petroleum Sto						Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	200111 0000	Date Required	i iiidi Bate		ziitoi ost savoa	00000 00100	25 / Illioune
rem bescription							
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	\$45	27-May-2021	22-May-2022	0.99	\$2	n/a	\$2
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0
Notes for DELAYED costs	inspection rec	ords and make th	em immediately	availab	ole for inspection u	dic operation and m pon request by age estimated date of o	ncy personnel.
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	d 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) Notes for AVOIDED costs				0.00	\$0	\$0	\$0
Approx. Cost of Compliance		\$45			TOTAL		\$2

Penalty Calculation Worksheet (PCW) Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021 **DATES** Assigned 26-Jul-2021 Screening 5-Aug-2021 PCW 9-Aug-2021 **EPA Due RESPONDENT/FACILITY INFORMATION** Respondent EMROOZ, Inc. dba Snappy Foods 24 Reg. Ent. Ref. No. RN108193590 Facility/Site Region 14-Corpus Christi Major/Minor Source Minor **CASE INFORMATION Enf./Case ID No.** 61150 No. of Violations 3 **Docket No.** 2021-1040-PST-E Order Type 1660 Media Program(s) Petroleum Storage Tank **Government/Non-Profit No** Multi-Media Enf. Coordinator Karolyn Kent EC's Team Enforcement Team 6 Admin. Penalty \$ Limit Minimum \$25,000 \$0 Maximum

			Penalty (Calcula	tion Section	on		
TOTA	L BASE PENA	LTY (Sum o	f violation bas	e penalt	ies)		Subtotal 1	\$5,250
ADJU :	STMENTS (+	/-) TO SUBT	OTAL 1					
			ng the Total Base Penalt) by the indicated pe			
	Compliance Hi	story		0.0%	Adjustment	Subto	tals 2, 3, & 7	\$0
	Notes		No adjustment fo	or compliar	nce history.			
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	The R	espondent does no	t meet the	culpability crite	ria.		
	Good Faith Eff	ort to Comply	Total Adjustment	S			Subtotal 5	\$0
				-				Т-
	Economic Bene	efit		0.0%	Enhancement*		Subtotal 6	\$0
		Total EB Amounts I Cost of Compliance	4505	U.U.	d at the Total EB \$ A	Amount		Ψ0
SUM (OF SUBTOTA	LS 1-7				F	Final Subtotal	\$5,250
OTHE	R FACTORS A	S HISTICE	MAY REQUIRE		2.3%		Adjustment	\$119
	or enhances the Final				2.5 /0		Aujustinent	ΨΙΙΟ
	Notes		to capture the avoid	ded cost of tion No. 1.	compliance ass	ociated with		
						Final Per	nalty Amount	\$5,369
STAT	UTORY LIMIT	Γ ADJUSTME	NT			Final Asse	essed Penalty	\$5,369
DEFEI	DDAI				20.00/	Dade dia	A -1:	¢1.072
	KKAL the Final Assessed Pe	enalty by the indicat	ed percentage.		20.0%	Reduction	Adjustment	-\$1,073
	Notes		Deferral offered fo	r expedited	d settlement.			
ΡΔΥΔ	BLE PENALT	v						\$4.296

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

Respondent EMROOZ, Inc. dba Snappy Foods 24

Case ID No. 61150

Reg. Ent. Reference No. RN108193590

Media Petroleum Storage Tank

Enf. Coordinator Karolyn Kent

Compliance History Worksheet									
>>	Co			hancement (Subtotal 2)	November 2	A dimak			
		Component	Number of		Number	Adjust.			
		NOVs	current enf	ices of violation ("NOVs") with same or similar violations as those in the orcement action (number of NOVs meeting criteria)	0	0%			
			Other writte		0	0%			
			, ,	final enforcement orders containing a denial of liability (<i>number of ting criteria</i>)	0	0%			
		Orders	a denial of	cated final enforcement orders, agreed final enforcement orders without liability, or default orders of this state or the federal government, or ohibitory emergency orders issued by the commission	0	0%			
		Judgments and Consent	of liability	judicated final court judgments or consent decrees containing a denial of this state or the federal government (number of judgments or crees meeting criteria)	0	0%			
		Decrees	final court	cated final court judgments and default judgments, or non-adjudicated judgments or consent decrees without a denial of liability, of this state ral government	0	0%			
		Convictions	0	0%					
		Emissions	0	0%					
	Texas Environ			fying the executive director of an intended audit conducted under the ronmental, Health, and Safety Audit Privilege Act, 74th Legislature, ber of audits for which notices were submitted)	0	0%			
		Addits		of violations under the Texas Environmental, Health, and Safety Audit tt, 74th Legislature, 1995 (<i>number of audits for which violations were</i>	0	0%			
			Environmer	ntal management systems in place for one year or more	No	0%			
		Other	· ·	on-site compliance assessments conducted by the executive director ecial assistance program	No	0%			
		5 3.1.5.	Participatio	n in a voluntary pollution reduction program	No	0%			
			, ,	liance with, or offer of a product that meets future state or federal tenvironmental requirements	No	0%			
				Adjustment Per	centage (Sub	ototal 2)	0%		
>>	Re	peat Violator ((Subtotal 3						
		No		Adjustment Per	centage (Sub	ototal 3)	0%		
>>	Co	mpliance Histo	ory Person	Classification (Subtotal 7)					
		Satisfactory I		Adjustment Per	centage (Sub	ototal 7)	0%		
>>	Co	mpliance Histo	ory Summa	ry					
		Compliance History Notes		No adjustment for compliance history.					
				Total Compliance History Adjustment Percentage (S	Subtotals 2,	<i>3,</i> & <i>7)</i> [0%		
>>	rına	I Compliance	History Adj	ustment Final Adjustment Percenta	age *capped	at 100%	0%		

	Scre	ening Date	5-Aug-2021		роск	et No. 2021-1040-PST-E		PCW
	R	espondent	EMROOZ, Inc.	dba Snappy F	oods 24		Policy Revisi	on 5 (January 28, 2021)
	C	ase ID No.	61150				PCW Rev	rision February 11, 2021
Reg. E	Ent. Ref	erence No.	RN108193590					
		Media	Petroleum Sto	rage Tank				
	Enf. C	oordinator	Karolyn Kent					
		tion Number		7				
				n Codo SS 22	4 45(4)(1)(5)(;;	i) and 224 E0/b)/(1)/(D) and	(b)(2) and	
		Rule Cite(s)	30 Tex. Admir			i) and 334.50(b)(1)(B) and 3475(a) and (c)(1)	(b)(2) and	
				TEX. Wa	iter Code § 26.	5475(a) and (c)(1)		
			Failed to mon	itor the under	ground storage	tank ("UST") for releases in	a manner	
			which will det	ect a release a	at a frequency of	of at least once every 30 day	<mark>/s by using</mark>	
				_		or after January 1, 2009. S		
	Violatio	n Description			•	the Respondent was not m		
			_			to provide release detection		
						system. Specifically, the Red		
			Had Hot co	nducted the al	illual lille leak	detector and piping tightnes	s tests.	
						Pac	so Bonalty	\$25,000
						Das	se Penalty	\$25,000
>> Fnv	ironme	ntal Prope	rty and Hun	nan Health	Matrix			
LIIV		iitai, i iope	. cy ana man	Harm	HACITA			
		Release	Major	Moderate	Minor			
OR		Actual				_	_	
		Potential	X			Percent 15.0%		
							-	
>>Prog	gramma	tic Matrix						
		Falsification	Major	Moderate	Minor		•	
						Percent 0.0%		
	Matrix					sed to pollutants that would		
	Notes	levels tha	at are protective	e of human he		mental receptors as a result	of the	
	110100				violation.			
							+24 250	
						Adjustment	\$21,250	
						Adjustment	\$21,250	\$3,750
						Adjustment	\$21,250	\$3,750
Violatio	on Even	ts				Adjustment	\$21,250	\$3,750
Violatio	on Even							\$3,750
Violatio	on Even		/iolation Events	1		Adjustment 70 Number of violation		\$3,750
Violatio	on Even			1				\$3,750
Violatio	on Even		daily	1				\$3,750
Violatio	on Even		daily weekly	1				\$3,750
Violatio	on Even		daily weekly monthly			70 Number of violation	n days	
Violatio	on Even		daily weekly monthly quarterly	5 1 X			n days	\$3,750 \$3,750
Violatio	on Even		daily weekly monthly quarterly semiannual	5 1 X		70 Number of violation	n days	
Violatio	on Even		daily weekly monthly quarterly semiannual annual	X		70 Number of violation	n days	
Violatio	on Even		daily weekly monthly quarterly semiannual	5 1 X		70 Number of violation	n days	
Violatio	on Even	Number of \	daily weekly monthly quarterly semiannual annual single event	X	the May 27, 27	70 Number of violation Violation Bas	n days	
Violatio	on Even	Number of \	daily weekly monthly quarterly semiannual annual single event	X X	•	Number of violation Violation Base O21 investigation date to the	n days	
Violatio	on Even	Number of \	daily weekly monthly quarterly semiannual annual single event	X X	the May 27, 20 screening date	Number of violation Violation Base O21 investigation date to the	n days	
		Number of \	daily weekly monthly quarterly semiannual annual single event	X X X X X X X X X X X X X X X X X X X	screening date	Number of violation Violation Base O21 investigation date to the	n days se Penalty e August 5,	\$3,750
		Number of \	daily weekly monthly quarterly semiannual annual single event	X mmended from 2021 0.0%	screening date	Number of violation Violation Base 221 investigation date to the	n days	
		Number of \	daily weekly monthly quarterly semiannual annual single event	x x mended from 2021 0.0% Before NOE/NOV	screening date	Number of violation Violation Base O21 investigation date to the	n days se Penalty e August 5,	\$3,750
		Number of \	daily weekly monthly quarterly semiannual annual single event	x x mended from 2021 0.0% Before NOE/NOV	screening date	Number of violation Violation Base 221 investigation date to the	n days se Penalty e August 5,	\$3,750
		Number of \	daily weekly monthly quarterly semiannual annual single event	X X 2021 0.0% Before NOE/NOV	screening date	Number of violation Violation Base 221 investigation date to the	n days se Penalty e August 5,	\$3,750
		Number of \	daily weekly monthly quarterly semiannual annual single event vevent is recom	X X 2021 0.0% Before NOE/NOV	screening date	Number of violation Violation Base 221 investigation date to the	n days se Penalty e August 5,	\$3,750
		Number of \	daily weekly monthly quarterly semiannual annual single event event is recom ply Extraordinary Ordinary	X X 2021 0.0% Before NOE/NOV	NOE/NOV to EDPI	Violation Base 221 investigation date to the	n days se Penalty e August 5,	\$3,750
		Number of \	daily weekly monthly quarterly semiannual annual single event event is recom ply Extraordinary Ordinary	X X 2021 0.0% Before NOE/NOV X The Respon	NOE/NOV to EDPR	Violation Base 221 investigation date to the second secon	n days se Penalty e August 5,	\$3,750
		Number of \	daily weekly monthly quarterly semiannual annual single event event is recom extraordinary Ordinary	X X 2021 0.0% Before NOE/NOV X The Respon	NOE/NOV to EDPI	Violation Base 221 investigation date to the second secon	n days se Penalty e August 5,	\$3,750
		Number of \	daily weekly monthly quarterly semiannual annual single event event is recom extraordinary Ordinary	X X 2021 0.0% Before NOE/NOV X The Respon	NOE/NOV to EDPR	Violation Base 221 investigation date to the second secon	e August 5,	\$3,750 \$0
		Number of \	daily weekly monthly quarterly semiannual annual single event event is recom extraordinary Ordinary	X X 2021 0.0% Before NOE/NOV X The Respon	NOE/NOV to EDPR	Violation Base 221 investigation date to the second secon	n days se Penalty e August 5,	\$3,750
Good Fa	aith Effo	One quarterly	daily weekly monthly quarterly semiannual annual single event event is recom extraordinary Ordinary N/A	X X Dimended from 2021 O.0% Before NOE/NOV X The Respon	NOE/NOV to EDPR	Violation Base 221 investigation date to the second secon	e August 5, Reduction	\$3,750 \$0
Good Fa	aith Effo	One quarterly	daily weekly monthly quarterly semiannual annual single event event is recom extraordinary Ordinary	X X Dimended from 2021 O.0% Before NOE/NOV X The Respon	NOE/NOV to EDPR	Violation Base 221 investigation date to the second secon	e August 5, Reduction	\$3,750 \$0
Good Fa	aith Effo	One quarterly orts to Com	daily weekly monthly quarterly semiannual annual single event event is recom extraordinary Ordinary N/A	X X D.0% Before NOE/NOV X The Respon	NOE/NOV to EDPR	Violation Base 221 investigation date to the second secon	e August 5, Reduction Subtotal t Test	\$3,750 \$0
Good Fa	aith Effo	One quarterly orts to Com	daily weekly monthly quarterly semiannual annual single event event is recom ply Extraordinary Ordinary N/A Notes r this violati	X X O.0% Before NOE/NOV X The Respon	NOE/NOV to EDPP	Violation Base 221 investigation date to the second secon	Reduction Subtotal t Test halty Total	\$3,750 \$3,750 \$3,835
Good Fa	aith Effo	One quarterly orts to Com	daily weekly monthly quarterly semiannual annual single event event is recom ply Extraordinary Ordinary N/A Notes r this violati	X X O.0% Before NOE/NOV X The Respon	NOE/NOV to EDPP	Violation Base 221 investigation date to the second secon	Reduction Subtotal t Test halty Total	\$3,750 \$3,750

	E	conomic	Benefit	Woi	rksheet					
Respondent	EMROOZ, Inc.	dba Snappy Food	ls 24							
Case ID No.	61150									
Reg. Ent. Reference No.	RN108193590									
Media	Petroleum Sto	rage Tank				Percent Interest	Years of			
Violation No.	1					Percent Interest	Depreciation			
						5.0	15			
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount			
Item Description										
reem Description										
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	+110	27.14	0 N	0.00	\$0	n/a	\$0			
Training/Sampling	\$118	27-May-2021	8-Nov-2021	0.45	\$3	n/a	\$3			
Remediation/Disposal				0.00	\$0	n/a	\$0			
Permit Costs Other (as needed)	\$1,500	27-May-2021	22-May-2022	0.00	\$0 \$74	n/a n/a	<u>\$0</u> \$74			
Notes for DELAYED costs	Facility (\$1,5 compliance	00). The Date Rec Estimated delaye	quired is the inved cost to condu	estigati ct the a	on date, and the F annual line leak de	ection method for the inal Date is the esting the control of the c	mated date of htness tests			
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering	item (except for	one-time avoided	d 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	\$118	27-May-2021	5-Aug-2021							
Other (as needed) Notes for AVOIDED costs	Estimated	# \$118								
Approx. Cost of Compliance		\$1,736			TOTAL		\$196			

	Scree	ning Date	5-Aug-2021		D	ocket No.	2021-1040-PST-E		PCW
	Re	spondent	EMROOZ, Inc.	dba Snappy F	oods 24			Policy Re	evision 5 (January 28, 2021)
	Ca	se ID No.	61150					PCW	Revision February 11, 2021
Rea.	Ent. Refe	rence No.	RN108193590						, .
			Petroleum Stor	age Tank					
	Enf. Co		Karolyn Kent	ago . a					
		ion Number	2						
		Rule Cite(s)		6 1 6 22 4	. 54(1)(2)(6	\('\\	W C C 26 2475	()(2)	
		()	30 Tex. Admi	n. Code § 334	1.51(b)(2)(C)(i) and lex.	Water Code § 26.3475	o(c)(2)	
	Violation	Description	automatically s level in th	hut off the flone tank reache	w of regulat es no higher partments w	ed substance than 95% ca	ropriate device designe es into the tank when the apacity level for the tan oped with overfill preve	ne liquid ık.	
							Base I	Penalty	\$25,000
>> En	vironman	tal Dropo	rty and Hun	nan Haalth	Matriv				
// LII	VIIOIIIIEII	tai, Prope	ity and mun	Harm	Matrix				
		Release	Major	Moderate	Minor				
OR		Actual							
		Potential		X			Percent 5.0%		
_						_			
>>Pro	grammat								
		Falsification	Major	Moderate	Minor	1	D		
	L					1	Percent 0.0%		
			Alexandria				:6:		
	Matrix					_	ificant amounts of pollu		
	Notes	that would no	t exceed levels	•	t of the viola		environmental receptor	ors as a	
	L			resui	t of the viole	itioii.			
						Δd	justment	\$23,750	
						710	Justilielle	<i>723/130</i>	
									\$1,250
Violati	ion Events	5							
		Number of \	/iolation Events	1	1	70	Number of violation da	.V.C	
		number of v	riolation Events	T	J	70	Number of violation da	iys	
			daily		1				
			weekly						
			monthly						
			quarterly	X			Violation Base I	Penalty	\$1,250
			semiannual						
			annual						
			single event						
	F								
		One quarterly	y event is recom		•		tigation date to the Au	gust 5,	
				2021	L screening of	date.			
	<u>L</u>								
Good F	Faith Effo	rts to Com	ply	0.0%			Re	duction	\$0
			В	efore NOE/NOV	NOE/NOV to E	DPRP/Settleme	nt Offer		
			Extraordinary						
			Ordinary						
			N/A	X					
				The Despond	ent does no	t meet the a	ood faith criteria for		
			Notes	THE INESPORT		s violation.	Joa Taltii Cilteria IVI		
					Ciric				
							Vialatian C	ubtet-1	#1 2F0
							Violation S	นมเดเลเ	\$1,250
Econo	mic Benef	it (EB) for	this violati	on			Statutory Limit 1	Test	
		Estimate	ed EB Amount		\$311] \	/iolation Final Penalt	y Total	\$1,278
								11. 11. 15	1.000
				This viol	ation Final	Assessed P	enalty (adjusted for	iimits)	\$1,278

	E	conomic	Benefit	Woi	ksheet		
Respondent	EMROOZ, Inc.	EMROOZ, Inc. dba Snappy Foods 24					
Case ID No.	61150						
Reg. Ent. Reference No.	RN108193590)					
	Petroleum Sto					Dawasut Intonset	Years of
Violation No.	2					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
zeem Description							
Delayed Costs							
Equipment	\$4,500	27-May-2021	22-May-2022	0.99	\$15	\$296	\$311
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 \$0	n/a n/a	\$0 \$0
Remediation/Disposal Permit Costs		1		0.00	\$0 \$0	n/a	\$0
Other (as needed)				0.00	\$0 \$0	n/a	\$0
Notes for DELAYED costs	(\$1,500 per l	JST compartment, the	for three comp Final Date is th	artmen e estim	ts). The Date Requated date of comp		ation date, and
Avoided Costs	ANNU	ALIZE avoided co	osts before en			one-time avoided	-
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Notes for AVOIDED costs		<u>'</u>		0.00	μ ψο	Ψ0	ŢŪ.
Approx. Cost of Compliance		\$4,500			TOTAL		\$311

	Screening Date	5-Aug-2021	Docket No. 2021-10	40-PST-E	PCW
	Respondent	EMROOZ, Inc. dba Snappy Fo	ods 24	Policy R	evision 5 (January 28, 2021)
	Case ID No.	61150		PCW	Revision February 11, 2021
Reg.	Ent. Reference No.	RN108193590			
	Media	Petroleum Storage Tank			
	Enf. Coordinator	Karolyn Kent			
	Violation Number	3			
	Rule Cite(s)	30 Te	c. Admin. Code § 334.10(b)(2)		
		30 10.	(1.7(a/iiii) code 3 33 1.10(b)(2)		
	Violation Description	periodic operation and maint	T recordkeeping requirements ar enance inspection records of the or inspection at the time of the ir	Facility's UST system	
				Base Penalty	\$25,000
>> Env	rironmental. Proper	rty and Human Health	Matrix		
	in ominicintary i rope.	Harm	· idelix		
	Release	Major Moderate	Minor		
OR	Actual				
	Potential		Percent	0.0%	
> > D###					
>>Prog	grammatic Matrix	Major Madarata	Minor		
	Falsification	Major Moderate	Minor Percent	1.0%	
			A Percent	1.0%	
	Matrix	Less than 30% of the	rule requirement was not met.		
	Notes				
			Adjustmen	\$24,750	
					\$250
	_				
Violatio	on Events				
	Number of V	iolation Events 1	70 Number	of violation days	
	Number of v	daily weekly monthly quarterly		lation Base Penalty	\$250
		semiannual annual single event X			
		One single e	vent is recommended.		
Good F	aith Efforts to Com	ply 0.0%		Reduction	\$0
			NOE/NOV to EDPRP/Settlement Offer		
		Extraordinary			
		Ordinary			
		N/A X			
		Notes The Responde	nt does not meet the good faith this violation.	criteria for	
				Violation Subtotal	\$250
Econon	nic Benefit (EB) for	this violation	Statut	ory Limit Test	
	Estimate	ed EB Amount	\$2 Violation	Final Penalty Total	\$256
	_50		<u> </u>	-	
		This viola	tion Final Assessed Penalty (adjusted for limits)	\$256

	E	conomic	Benefit	Woi	rksheet		
Respondent	Respondent EMROOZ, Inc. o						
Case ID No.							
Reg. Ent. Reference No.	RN108193590						
	Petroleum Sto					Percent Interest	Years of Depreciation
11010000111101						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
200200							
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		27.14	22.11	0.00	\$0	n/a	\$0
Record Keeping System	\$45	27-May-2021	22-May-2022	0.99	\$2	n/a	\$2
Training/Sampling		<u> </u>		0.00	\$0 \$0	n/a	\$0
Remediation/Disposal Permit Costs				0.00	\$0 \$0	n/a	\$0 \$0
Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0
Notes for DELAYED costs	immedia	tely available for investigation da	nspection upon ate, and the Fina	request al Date	by agency person is the estimated d	·	ired is the
Avoided Costs	ANNU	ALIZE avoided c	osts before en			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment		1		0.00	\$0	\$0 *0	\$0
Financial Assurance ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0
Notes for AVOIDED costs		JI J		0.00	1 40	\$ 0	\$U
Approx. Cost of Compliance		\$45			TOTAL		\$2

The TCEQ is committed to accessibility.

To request a more accessible version of this report, please contact the TCEO Help Desk at (512) 239-4357.



Compliance History Report

Compliance History Report for CN603931924, RN101902054, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent, CN603931924, EMROOZ, Inc. Classification: SATISFACTORY Rating: 9.59

or Owner/Operator:

Regulated Entity: RN101902054, Snappy Foods 6 **Classification:** SATISFACTORY **Rating:** 0.17

Complexity Points: 5 Repeat Violator: NO

CH Group: 14 - Other

Location: 811 Voss Avenue, Odem, San Patricio County, Texas 78370-4353

TCEQ Region: REGION 14 - CORPUS CHRISTI

ID Number(s):

PETROLEUM STORAGE TANK REGISTRATION

REGISTRATION 13988

Compliance History Period: September 01, 2016 to August 31, 2021 Rating Year: 2021 Rating Date: 09/01/2021

Date Compliance History Report Prepared: September 21, 2021 **Agency Decision Requiring Compliance History:** Enforcement

Component Period Selected: September 21, 2016 to September 21, 2021

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Karolyn Kent **Phone:** (512) 239-2536

Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five year compliance period?

2) Has there been a (known) change in ownership/operator of the site during the compliance period? YES

33) Who is the current owner/operator? EMROOZ, Inc. OPERATOR since 3/4/2019

42 Convenience Holdings, LLC OWNER since 3/4/2019

YES

4) Who was/were the prior owner(s)/operator(s)? EMROOZ, Inc., OWNER OPERATOR, 6/16/2011 to 3/3/2019

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 August 31, 2018 (1506945)

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.

1 Date: 05/27/2021 (1723778)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 334, SubChapter C 334.50(b)(1)(A)

Description: Failed to monitor all such tanks in a manner which will detect a release at a

frequency of at least once every 30-days by using one or more of the release

detection methods described in subsection (d)(4) - (10).

G.	Type of environmental management systems (EMSs): $\ensuremath{N/A}$
н.	Voluntary on-site compliance assessment dates: $\ensuremath{N/A}$
I.	Participation in a voluntary pollution reduction program: $\ensuremath{N/A}$
J.	Early compliance:
	es Outside of Texas:

F. Environmental audits:

N/A

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To request a more accessible version of this report, please contact the TCEO Help Desk at (512) 239-4357.



Compliance History Report

Compliance History Report for CN603931924, RN108193590, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent, CN603931924, EMROOZ, Inc. Classification: SATISFACTORY Rating: 9.59

or Owner/Operator:

Regulated Entity: RN108193590, Snappy Foods 24 Classification: HIGH Rating: 0.00

Complexity Points: 4 Repeat Violator: NO

CH Group: 14 - Other

Location: 809 South Alamo Street, Refugio, Refugio County, Texas 78377-2103

TCEQ Region: REGION 14 - CORPUS CHRISTI

ID Number(s):

PETROLEUM STORAGE TANK REGISTRATION

REGISTRATION 87524

Compliance History Period: September 01, 2016 to August 31, 2021 Rating Year: 2021 Rating Date: 09/01/2021

Date Compliance History Report Prepared: September 21, 2021 **Agency Decision Requiring Compliance History:** Enforcement

Component Period Selected: September 21, 2016 to September 21, 2021

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Karolyn Kent **Phone:** (512) 239-2536

Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five year compliance period?

YES YES

2) Has there been a (known) change in ownership/operator of the site during the compliance period?

3) Who is the current owner/operator?

EMROOZ, Inc. OPERATOR since 3/4/2019

42 Convenience Holdings, LLC OWNER since 3/4/2019

4) Who was/were the prior owner(s)/operator(s)?

EMROOZ, Inc., OWNER OPERATOR, 6/11/2015 to 3/3/2019

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 August 31, 2018 (1506944)

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: $\ensuremath{\mathsf{N}/\mathsf{A}}$

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	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	
EMROOZ, INC. DBA SNAPPY	§	TEXAS COMMISSION ON
FOODS 6 AND DBA SNAPPY	§	TEXAS COMMISSION ON
FOODS 24	§	
RN101902054	§	
RN108193590	§	ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2021-1040-PST-E

I. JURISDICTION AND STIPULATIONS

On	, the Texas Commission on Environmental Quality ("the
Commission" or "TO	CEQ") considered this agreement of the parties, resolving an enforcement
action regarding EN	IROOZ, Inc. dba Snappy Foods 6 and dba Snappy Foods 24 (the
"Respondent") und	er the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director
of the TCEO, throug	th the Enforcement Division, and the Respondent together stipulate that:

- 1. The Respondent operates, as defined in 30 Tex. Admin. Code § 334.2(75), two underground storage tank ("UST") systems and two convenience stores with retail sales of gasoline located at the following locations:
 - a. Snappy Foods 6, 811 Voss Avenue, Odem, San Patricio County, Texas ("Facility No. 1"); and
 - b. Snappy Foods 24, 809 South Alamo Street, Refugio, Refugio County, Texas ("Facility No. 2").

The UST systems at Facility No. 1 and Facility No. 2 (collectively referred to as the "Facilities") are not exempt or excluded from regulation under the Texas Water Code or the rules of the Commission, and contain or contained a regulated petroleum substance as defined in the rules of the TCEO.

- 2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to Tex. Water Code §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to Tex. Water Code § 5.013 because it alleges violations of Tex. Water Code ch. 26 and the rules of the TCEQ.
- 3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

- 4. An administrative penalty in the amount of \$10,468 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$256 of the penalty and \$2,092 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order and shall be waived only upon full compliance with all the terms and conditions of this Order.
 - The remaining amount of \$8,120 of the undeferred penalty shall be paid in 35 monthly payments of \$232 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 the Respondent fails to comply with the payment requirements of this Order, including the payment schedule, the Executive Director may accelerate the maturity of the remaining installments, in which event the unpaid balance shall become immediately due and payable without demand or notice. The Respondent's failure to meet the payment schedule of this Order and/or the acceleration of any remaining balance constitutes the failure by the Respondent to timely and satisfactorily comply with all the terms and conditions of this Order and the Executive Director may demand payment of all or part of the deferred penalty amount.
- 5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
- 6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.
- 7. This Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
- 8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
- 9. The Executive Director recognizes that the Respondent conducted the annual line leak detector and piping tightness tests at Facility No. 1 on December 9, 2021, and Facility No. 2 on November 8, 2021, with passing results.

II. ALLEGATIONS

During an investigation at Facility No. 1 conducted on May 27, 2021, an investigator documented that the Respondent:

1. Failed to provide release detection for the pressurized piping associated with the UST system, in violation of 30 Tex. Admin. Code § 334.50(b)(2) and Tex. Water Code

- § 26.3475(a). Specifically, the Respondent had not conducted the annual line leak detector and piping tightness tests.
- 2. Failed to ensure that all installed spill and overfill prevention devices are maintained in good operating condition, in violation of 30 Tex. ADMIN. CODE §§ 334.48(d) and 334.51(a)(6) and Tex. Water Code § 26.3475(c)(2). Specifically, the spill buckets for the super unleaded gasoline and diesel fuel compartments of UST No. 2 at the Facility were cracked.
- 3. Failed to equip each UST with a valve or other appropriate device designed to automatically shut off the flow of regulated substances into the tank when the liquid level in the tank reaches no higher than 95% capacity level for the tank, in violation of 30 Tex. ADMIN. CODE § 334.51(b)(2)(C)(i) and Tex. WATER CODE § 26.3475(c)(2). Specifically, the diesel fuel compartment of UST No. 2 was not equipped with overfill prevention equipment.
- 4. Failed to assure that all UST recordkeeping requirements are met, in violation of 30 TEX. ADMIN. CODE § 334.10(b)(2). Specifically, tank release detection records and periodic operation and maintenance inspection records of the Facility's UST system were not available for inspection at the time of the investigation.

During an investigation at Facility No. 2 conducted on May 27, 2021, an investigator documented that the Respondent:

- 1. Failed to monitor the UST for releases in a manner which will detect a release at a frequency of at least once every 30 days by using interstitial monitoring for tanks installed on or after January 1, 2009, in violation of 30 Tex. ADMIN. CODE §§ 334.45(d)(1)(E)(iii) and 334.50(b)(1)(B) and Tex. WATER CODE § 26.3475(c)(1). Specifically, the UST was installed on June 11, 2015 and the Respondent was not monitoring it using interstitial monitoring.
- 2. Failed to provide release detection for the pressurized piping associated with the UST system, in violation of 30 Tex. Admin. Code § 334.50(b)(2) and Tex. Water Code § 26.3475(a). Specifically, the Respondent had not conducted the annual line leak detector and piping tightness tests.
- 3. Failed to equip the UST with a valve or other appropriate device designed to automatically shut off the flow of regulated substances into the tank when the liquid level in the tank reaches no higher than 95% capacity level for the tank, in violation of 30 Tex. ADMIN. CODE § 334.51(b)(2)(C)(i) and Tex. WATER CODE § 26.3475(c)(2). Specifically, the UST compartments were not equipped with overfill prevention equipment.
- 4. Failed to assure that all UST recordkeeping requirements are met, in violation of 30 TEX. ADMIN. CODE § 334.10(b)(2). Specifically, periodic operation and maintenance inspection records of the Facility's UST system were not available for inspection at the time of the investigation.

III. DENIALS

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

IV. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: EMROOZ, Inc. dba Snappy Foods 6 and dba Snappy Foods 24, Docket No. 2021-1040-PST-E" to:

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

- 2. The Respondent shall undertake the following technical requirements:
 - a. Immediately upon the effective date of this Order for Facility No. 1, begin maintaining UST records, including, but not limited to, tank release detection and periodic operation and maintenance inspection records, and make them immediately available for inspection upon request by agency personnel, in accordance with 30 Tex. Admin. Code § 334.10.
 - b. Within 30 days after the effective date of this Order for Facility No. 1:
 - i. Replace the spill buckets for the super unleaded gasoline and diesel fuel compartments of UST No. 2, in accordance with 30 TEX. ADMIN. CODE §§ 334.48 and 334.51; and
 - ii. Install overfill prevention equipment for the diesel fuel compartment of UST No. 2, in accordance with 30 TEX. ADMIN. CODE § 334.51.
 - c. Immediately upon the effective date of this Order for Facility No. 2, begin maintaining UST records, including, but not limited to, periodic operation and maintenance inspection records, and make them immediately available for inspection upon request by agency personnel, in accordance with 30 Tex. ADMIN. CODE § 334.10.
 - d. Within 30 days after the effective date of this Order for Facility No. 2:
 - i. Implement interstitial monitoring release detection method for the UST at the Facility, in accordance with 30 TEX. ADMIN. CODE § 334.50; and

- ii. Install overfill prevention equipment for all UST compartments at the Facility, in accordance with 30 TEX. ADMIN. CODE § 334.51.
- e. 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 Nos. 2.a, 2.b, 2.c, and 2.d. 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:

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

with a copy to:

Waste Section Manager Corpus Christi Regional Office Texas Commission on Environmental Quality 6300 Ocean Drive, Suite 1200 Corpus Christi, Texas 78412-5839

- 3. All relief not expressly granted in this Order is denied.
- 4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facilities operations referenced in this Order.
- 5. If the 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, the Respondent's failure to comply is not a violation of this Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and

substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Order Compliance Team at the address listed above.

- 7. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- This Order may be executed in separate and multiple counterparts, which together shall 8. 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.

EMROOZ, Inc. dba Snappy Foods 6 and dba Snappy Foods 24 DOCKET NO. 2021-1040-PST-E Page 7

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	Date
	9/14/2022
For the Executive Director	Date
I, the undersigned, have read and understand the the attached Order, and I do agree to the terms ar acknowledge that the TCEQ, in accepting paymen on such representation.	t for the penalty amount, is materially relying
I also understand that failure to comply with the (and/or failure to timely pay the penalty amount, I	Ordering Provisions, if any, in this Order nay result in:
 TCEQ seeking other relief as authorized by l 	's Office for contempt, injunctive rener, r to a collection agency; nt actions; office of any future enforcement actions; and aw.
In addition, any falsification of any compliance do	ocuments may result in criminal prosecution.
Doll	3/22/22 Date
Signature	Date
Agha Ki	Oherer
Name (Printed or typed) Authorized Representative of EMROOZ, Inc. dba Snappy Foods 6 and dba Snap	Title opy Foods 24
\square If mailing address has changed, please check	this box and provide the new address below: