

EXECUTIVE SUMMARY – ENFORCEMENT MATTER – CASE NO. 61529
Pilot Thomas Logistics LLC DBA Pilot Thomas Logistics Card-Lock # 8622 and
Pilot Thomas Logistics Card-Lock # 8612
RN102243185; RN102219433
Docket No. 2021-1446-PST-E

Page 1 of 2

Order Type:
Agreed Order

Media:
PST

Small Business:
Yes

Location(s) Where Violation(s) Occurred:
2410 West Wall Street, Midland, Midland County (Facility 1)
803 Hobbs Highway, Seminole, Gaines County (Facility 2)

Type of Operation:
underground storage tank ("UST") systems and fleet refueling facility with retail sales of gasoline

Other Significant Matters:

Additional Pending Enforcement Actions:	Yes, 2022-1304-PST-E; 2023-1166-PST-E; and 2024-0231-MLM-E
Past-Due Penalties:	None
Past-Due Fees:	None
Other:	None
Interested Third-Parties:	None

Texas Register Publication Date: July 5, 2024

Comments Received: None

Penalty Information

Total Penalty Assessed: \$12,000

Total Paid to General Revenue: \$12,000

Total Due to General Revenue: \$0

Compliance History Classifications:

Person/CN - HIGH
Site/RN - HIGH (F1); HIGH (F2)

Major Source: No

Statutory Limit Adjustment: None

Applicable Penalty Policy: January 28, 2021

Investigation Information

Complaint Dates(s): N/A

Date(s) of Investigation: September 22, 2021; October 20, 2021

Date(s) of NOV(s): N/A

Date(s) of NOE(s): October 22, 2021; November 12, 2021

EXECUTIVE SUMMARY – ENFORCEMENT MATTER – CASE NO. 61529
Pilot Thomas Logistics LLC DBA Pilot Thomas Logistics Card-Lock # 8622 and
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RN102243185; RN102219433
Docket No. 2021-1446-PST-E

Page 2 of 2

Violation Information

Facility 1 and 2:

1. Failed to make available to a common carrier a valid, current TCEQ delivery certificate before accepting delivery of a regulated substance into the UST [TEX. WATER CODE § 26.3467(a) and 30 TEX. ADMIN. CODE § 334.8(c)(5)(A)(i)].
2. Failed to renew a previously issued UST delivery certificate by submitting a properly completed UST registration and self-certification form at least 30 days before the expiration date [30 TEX. ADMIN. CODE § 334.8(c)(4)(A)(vii) and (c)(5)(B)(ii)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

Respondent submitted a properly completed UST registration and self-certification form and obtained a valid, current TCEQ delivery certificate on December 16, 2021, and on November 29, 2021.

Technical Requirements:

None

Litigation Information

Settlement Date: June 10, 2024

Contact Information

TCEQ Attorneys: Taylor Pack Ellis, Litigation Division, (512) 239-3400
Sheldon Wayne, Public Interest Counsel, (512) 239-6363

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

TCEQ Enforcement Coordinator: Lauren Little, Enforcement Division, (817) 588-5888

TCEQ Regional Contact: Crystal Garcia, Midland Regional Office, (432) 570-1359

Respondent Contact: David Dodson, Vice President, Pilot Thomas Logistics LLC, 1051 Mustang Drive, Suite 600, Grapevine, Texas 76051, P.O. Box 2136, Grapevine, Texas 76099

Respondent's Attorney: James A. Edwards, Chief Legal Officer, Pilot Thomas Logistics LLC, 1051 Mustang Drive, Suite 600, Grapevine, Texas 76051



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	25-Oct-2021	Screening	4-Nov-2021	EPA Due	
	PCW	22-Nov-2021				

RESPONDENT/FACILITY INFORMATION

Respondent	Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card-Lock # 8622
Reg. Ent. Ref. No.	RN102243185 (Facility No. 1)
Facility/Site Region	7-Midland
Major/Minor Source	Minor

CASE INFORMATION

Enf./Case ID No.	61529	No. of Violations	2
Docket No.	2021-1446-PST-E	Order Type	1660
Media Program(s)	Petroleum Storage Tank	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Horus Garcia
		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	\$7,500
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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	-\$750
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Notes	Reduction for High Performer classification.
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Culpability	No	0.0%	Enhancement	Subtotal 4	\$0
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Notes	The Respondent does not meet the culpability criteria.
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Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$750
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$1	*Capped at the Total EB \$ Amount
Estimated Cost of Compliance	\$40	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$6,000
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes	
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Final Penalty Amount	\$6,000
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$6,000
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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.
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PAYABLE PENALTY	\$6,000
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Screening Date	4-Nov-2021	Docket No.	2021-1446-PST-E	PCW
Respondent	Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card-Lock #			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	61529			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN102243185 (Facility No. 1)			
Media	Petroleum Storage Tank			
Enf. Coordinator	Horus Garcia			

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	4-Nov-2021	Docket No.	2021-1446-PST-E	PCW
Respondent	Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card-Lock # 8622		<i>Policy Revision 5 (January 28, 2021)</i>	
Case ID No.	61529		<i>PCW Revision February 11, 2021</i>	
Reg. Ent. Reference No.	RN102243185 (Facility No. 1)			
Media	Petroleum Storage Tank			
Enf. Coordinator	Horus Garcia			
Violation Number	1			
Rule Cite(s)	30 Tex. Admin. Code § 334.8(c)(5)(A)(i) and Tex. Water Code § 26.3467(a)			
Violation Description	Failed to make available to a common carrier a valid, current TCEQ delivery certificate before accepting delivery of a regulated substance into the underground storage tanks ("USTs"). Specifically, the delivery certificate expired on June 30, 2020, and at least one fuel delivery was received on February 4, 2021, without a valid, current TCEQ delivery certificate.			
Base Penalty				\$25,000

>> Environmental, Property and Human Health Matrix

OR	Harm				
	Release	Major	Moderate	Minor	
	Actual				
	Potential				
					Percent 0.0%

>>> Programmatic Matrix

Matrix Notes	Falsification	Major	Moderate	Minor	
		X			
					Percent 10.0%
100% of the rule requirement was not met.					
Adjustment					\$22,500

\$2,500

Violation Events

Number of Violation Events	1	1	Number of violation days
daily			
weekly			
monthly			
quarterly			
semiannual			
annual			
single event		X	
One single event is recommended.			
Violation Base Penalty			

\$2,500

Good Faith Efforts to Comply

10.0%		
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		X
N/A		
The Respondent achieved compliance by submitting an updated Registration and Self-Certification Form and was issued a new delivery certificate on December 16, 2021, after the October 22, 2021 Notice of Enforcement ("NOE").		
Violation Subtotal		\$2,250

Economic Benefit (EB) for this violation

Estimated EB Amount	\$1
Statutory Limit Test	
Violation Final Penalty Total	\$2,000
This violation Final Assessed Penalty (adjusted for limits)	\$2,000

Economic Benefit Worksheet

Respondent Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card-Lock # 8622
Case ID No. 61529
Reg. Ent. Reference No. RN102243185 (Facility No. 1)
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				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	\$40	30-Jun-2021	16-Dec-2021	0.46	\$1	n/a	\$1
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated delayed cost to renew a delivery certificate by submitting a properly completed UST registration and self-certification form and to obtain a valid, current TCEQ delivery certificate. The Date Required is the expiration date of the delivery certificate, 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

\$40

TOTAL

\$1

Screening Date 4-Nov-2021 Respondent Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card-Lock # 8622 Case ID No. 61529 Reg. Ent. Reference No. RN102243185 (Facility No. 1) Media Petroleum Storage Tank Enf. Coordinator Horus Garcia	Docket No. 2021-1446-PST-E PCW <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>																	
Violation Number <input style="width: 50px;" type="text" value="2"/>																		
Rule Cite(s) <input style="width: 400px;" type="text" value="30 Tex. Admin. Code § 334.8(c)(4)(A)(vii) and (c)(5)(B)(ii)"/>																		
Violation Description <input style="width: 480px; height: 60px;" type="text" value="Failed to renew a previously issued UST delivery certificate by submitting a properly completed UST registration and self-certification form at least 30 days before the expiration date. Specifically, the delivery certificate expired on June 30, 2020."/>																		
Base Penalty <input style="width: 100px;" type="text" value="\$25,000"/>																		
>> Environmental, Property and Human Health Matrix																		
OR	<table border="1" style="margin: auto;"> <tr> <td></td> <th colspan="3">Harm</th> </tr> <tr> <td>Release</td> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td>Actual</td> <td><input style="width: 50px;" type="text"/></td> <td><input style="width: 50px;" type="text"/></td> <td><input style="width: 50px;" type="text"/></td> </tr> <tr> <td>Potential</td> <td><input style="width: 50px;" type="text"/></td> <td><input style="width: 50px;" type="text"/></td> <td><input style="width: 50px;" type="text"/></td> </tr> </table>		Harm			Release	Major	Moderate	Minor	Actual	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	Potential	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	Percent <input style="width: 50px;" type="text" value="0.0%"/>
		Harm																
	Release	Major	Moderate	Minor														
Actual	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>															
Potential	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>															
>> Programmatic Matrix																		
Matrix Notes	<table border="1" style="margin: auto;"> <tr> <td></td> <th>Falsification</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td></td> <td><input style="width: 50px;" type="text"/></td> <td><input style="width: 50px;" type="text" value="x"/></td> <td><input style="width: 50px;" type="text"/></td> <td><input style="width: 50px;" type="text"/></td> </tr> </table>		Falsification	Major	Moderate	Minor		<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text" value="x"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	Percent <input style="width: 50px;" type="text" value="10.0%"/>						
		Falsification	Major	Moderate	Minor													
		<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text" value="x"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>													
<input style="width: 560px;" type="text" value="Less than 30% of the rule requirement was not met."/>																		
Adjustment <input style="width: 100px;" type="text" value="\$22,500"/>																		
<input style="width: 100px;" type="text" value="\$2,500"/>																		
Violation Events																		
Number of Violation Events <input style="width: 50px;" type="text" value="2"/> <input style="width: 50px;" type="text" value="492"/> Number of violation days																		
<table border="1" style="width: 150px;"> <tr><td>daily</td><td><input style="width: 50px;" type="text"/></td></tr> <tr><td>weekly</td><td><input style="width: 50px;" type="text"/></td></tr> <tr><td>monthly</td><td><input style="width: 50px;" type="text"/></td></tr> <tr><td>quarterly</td><td><input style="width: 50px;" type="text"/></td></tr> <tr><td>semiannual</td><td><input style="width: 50px;" type="text"/></td></tr> <tr><td>annual</td><td><input style="width: 50px;" type="text" value="x"/></td></tr> <tr><td>single event</td><td><input style="width: 50px;" type="text"/></td></tr> </table>	daily	<input style="width: 50px;" type="text"/>	weekly	<input style="width: 50px;" type="text"/>	monthly	<input style="width: 50px;" type="text"/>	quarterly	<input style="width: 50px;" type="text"/>	semiannual	<input style="width: 50px;" type="text"/>	annual	<input style="width: 50px;" type="text" value="x"/>	single event	<input style="width: 50px;" type="text"/>	Violation Base Penalty <input style="width: 100px;" type="text" value="\$5,000"/>			
daily	<input style="width: 50px;" type="text"/>																	
weekly	<input style="width: 50px;" type="text"/>																	
monthly	<input style="width: 50px;" type="text"/>																	
quarterly	<input style="width: 50px;" type="text"/>																	
semiannual	<input style="width: 50px;" type="text"/>																	
annual	<input style="width: 50px;" type="text" value="x"/>																	
single event	<input style="width: 50px;" type="text"/>																	
<input style="width: 560px;" type="text" value="Two annual events are recommended from the June 30, 2020 expiration date of the previous delivery certificate to the November 4, 2021 screening date."/>																		
Good Faith Efforts to Comply																		
10.0%																		
Reduction <input style="width: 100px;" type="text" value="\$500"/>																		
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer																		
Extraordinary <input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>																	
Ordinary <input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text" value="X"/>																	
N/A <input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>																	
<input style="width: 560px;" type="text" value="The Respondent achieved compliance by submitting an updated Registration and Self-Certification Form and was issued a new delivery certificate on December 16, 2021, after the October 22, 2021 NOE."/>																		
Violation Subtotal <input style="width: 100px;" type="text" value="\$4,500"/>																		
Economic Benefit (EB) for this violation																		
Statutory Limit Test																		
Estimated EB Amount <input style="width: 100px;" type="text" value="\$0"/>	Violation Final Penalty Total <input style="width: 100px;" type="text" value="\$4,000"/>																	
This violation Final Assessed Penalty (adjusted for limits) <input style="width: 100px;" type="text" value="\$4,000"/>																		

Economic Benefit Worksheet

Respondent Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card-Lock # 8622
Case ID No. 61529
Reg. Ent. Reference No. RN102243185 (Facility No. 1)
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)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Economic Benefit included in Violation No. 1

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

\$0

TOTAL

\$0



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	15-Nov-2021	Screening	23-Nov-2021	EPA Due	
	PCW	16-Dec-2021				

RESPONDENT/FACILITY INFORMATION

Respondent	Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card-Lock # 8612
Reg. Ent. Ref. No.	RN102219433 (Facility No. 2)
Facility/Site Region	7-Midland
Major/Minor Source	Minor

CASE INFORMATION

Enf./Case ID No.	61529	No. of Violations	2
Docket No.	2021-1446-PST-E	Order Type	1660
Media Program(s)	Petroleum Storage Tank	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Sarah Smith
		EC's Team	Enforcement Team 7
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$7,500
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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	-\$750
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Notes	Reduction for High Performer classification.
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Culpability	No	0.0%	Enhancement	Subtotal 4	\$0
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Notes	The Respondent does not meet the culpability criteria.
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Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$750
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$3	*Capped at the Total EB \$ Amount
Estimated Cost of Compliance	\$40	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$6,000
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes	
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Final Penalty Amount	\$6,000
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$6,000
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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.
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PAYABLE PENALTY	\$6,000
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Screening Date	23-Nov-2021	Docket No.	2021-1446-PST-E	PCW
Respondent	Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card-Lock #			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	61529			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN102219433 (Facility No. 2)			
Media	Petroleum Storage Tank			
Enf. Coordinator	Sarah Smith			

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	0	0%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 0%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

High Performer

Adjustment Percentage (Subtotal 7) -10%

>> Compliance History Summary

Compliance History Notes

Reduction for High Performer classification.

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

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% -10%

Screening Date	23-Nov-2021	Docket No.	2021-1446-PST-E	PCW
Respondent	Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card-Lock # 8612	<i>Policy Revision 5 (January 28, 2021)</i>		
Case ID No.	61529	<i>PCW Revision February 11, 2021</i>		
Reg. Ent. Reference No.	RN102219433 (Facility No. 2)			
Media	Petroleum Storage Tank			
Enf. Coordinator	Sarah Smith			
Violation Number	1			
Rule Cite(s)	30 Tex. Admin. Code § 334.8(c)(5)(A)(i) and Tex. Water Code § 26.3467(a)			
Violation Description	Failed to make available to a common carrier a valid, current TCEQ delivery certificate before accepting delivery of a regulated substance into the underground storage tanks ("USTs"). Specifically, the delivery certificate expired on June 30, 2020, and five fuel deliveries were received between September 4, 2021 and October 3, 2021, without a valid, current TCEQ delivery certificate.			
Base Penalty				\$25,000

>> Environmental, Property and Human Health Matrix

OR	Harm				
	Release	Major	Moderate	Minor	
	Actual				
	Potential				
					Percent 0.0%

>>> Programmatic Matrix

Matrix Notes	Falsification	Major	Moderate	Minor	
		X			
					Percent 10.0%
100% of the rule requirement was not met.					
Adjustment					\$22,500

\$2,500

Violation Events

Number of Violation Events	1	5	Number of violation days
daily			
weekly			
monthly			
quarterly			
semiannual			
annual			
single event	X		
One single event is recommended.			
Violation Base Penalty			

\$2,500

Good Faith Efforts to Comply

	10.0%		
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
Extraordinary			
Ordinary		X	
N/A			
Notes	The Respondent achieved compliance by submitting an updated Registration and Self-Certification Form and was issued a new delivery certificate on November 29, 2021, after the November 12, 2021 Notice of Enforcement ("NOE").		
Violation Subtotal			

\$2,250

Economic Benefit (EB) for this violation

Estimated EB Amount	Statutory Limit Test
\$3	
Violation Final Penalty Total	
\$2,000	
This violation Final Assessed Penalty (adjusted for limits)	
\$2,000	

Economic Benefit Worksheet

Respondent Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card-Lock # 8612
Case ID No. 61529
Reg. Ent. Reference No. RN102219433 (Facility No. 2)
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				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	\$40	30-Jun-2020	29-Nov-2021	1.42	\$3	n/a	\$3
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated delayed cost to renew a delivery certificate by submitting a properly completed UST registration and self-certification form and to obtain a valid, current TCEQ delivery certificate. The Date Required is the expiration date of the delivery certificate, 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

\$40

TOTAL

\$3

Screening Date 23-Nov-2021 Respondent Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card-Lock # 8612 Case ID No. 61529 Reg. Ent. Reference No. RN102219433 (Facility No. 2) Media Petroleum Storage Tank Enf. Coordinator Sarah Smith	Docket No. 2021-1446-PST-E PCW <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>						
Violation Number <input style="width: 50px;" type="text" value="2"/>							
Rule Cite(s) <input style="width: 800px;" type="text" value="30 Tex. Admin. Code § 334.8(c)(4)(A)(vii) and (c)(5)(B)(ii)"/>							
Violation Description <input style="width: 800px;" type="text" value="Failed to renew a previously issued UST delivery certificate by submitting a properly completed UST registration and self-certification form at least 30 days before the expiration date. Specifically, the delivery certificate expired on June 30, 2020."/>							
Base Penalty <input style="width: 100px;" type="text" value="\$25,000"/>							
>> Environmental, Property and Human Health Matrix							
OR		Harm					
	Release	Major	Moderate	Minor			
	Actual	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>			
	Potential	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>			
					Percent	<input style="width: 50px;" type="text" value="0.0%"/>	
>> Programmatic Matrix							
	Falsification	Major	Moderate	Minor			
	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text" value="X"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>			
					Percent	<input style="width: 50px;" type="text" value="10.0%"/>	
Matrix Notes	<input style="width: 800px;" type="text" value="100% of the rule requirement was not met."/>						
					Adjustment	<input style="width: 100px;" type="text" value="\$22,500"/>	
					<input style="width: 100px;" type="text" value="\$2,500"/>		
Violation Events							
Number of Violation Events		<input style="width: 50px;" type="text" value="2"/>	<input style="width: 50px;" type="text" value="511"/>		Number of violation days		
	daily	<input style="width: 50px;" type="text"/>					
	weekly	<input style="width: 50px;" type="text"/>					
	monthly	<input style="width: 50px;" type="text"/>					
	quarterly	<input style="width: 50px;" type="text"/>					
	semiannual	<input style="width: 50px;" type="text"/>					
	annual	<input style="width: 50px;" type="text" value="X"/>					
	single event	<input style="width: 50px;" type="text"/>					
					Violation Base Penalty	<input style="width: 100px;" type="text" value="\$5,000"/>	
<input style="width: 800px;" type="text" value="Two annual events are recommended from the June 30, 2020 expiration date of the delivery certificate to the November 23, 2021 screening date."/>							
Good Faith Efforts to Comply		10.0%			Reduction	<input style="width: 100px;" type="text" value="\$500"/>	
		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer				
	Extraordinary	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>				
	Ordinary	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text" value="X"/>				
	N/A	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>				
Notes	<input style="width: 800px;" type="text" value="The Respondent achieved compliance by submitting an updated Registration and Self-Certification Form and was issued a new delivery certificate on November 29, 2021, after the November 12, 2021 NOE."/>						
					Violation Subtotal	<input style="width: 100px;" type="text" value="\$4,500"/>	
Economic Benefit (EB) for this violation				Statutory Limit Test			
Estimated EB Amount		<input style="width: 100px;" type="text" value="\$0"/>	Violation Final Penalty Total		<input style="width: 100px;" type="text" value="\$4,000"/>		
					This violation Final Assessed Penalty (adjusted for limits)		
					<input style="width: 100px;" type="text" value="\$4,000"/>		

Economic Benefit Worksheet

Respondent Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card-Lock # 8612

Case ID No. 61529

Case ID No.	61829
Req. Ent. Reference No.	RN102219433 (Facility No. 2)

Media Petroleum Storage Tank

Violation No. 2

Percent Interest	Years of Depreciation
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5.0	15
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Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

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)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Economic Benefit included in Violation No. 1

Avoided Costs

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

Avoided Costs				Prevention 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

\$0

TOTAL

\$0



Compliance History Report

Compliance History Report for CN604019786, RN102243185, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent, or Owner/Operator: CN604019786, Pilot Thomas Logistics LLC **Classification:** HIGH **Rating:** 0.09

Regulated Entity: RN102243185, Pilot Thomas Logistics Card-Lock # 8622 **Classification:** HIGH **Rating:** 0.00

Complexity Points: 3 **Repeat Violator:** NO

CH Group: 14 - Other

Location: 2410 West Wall Street, Midland, Midland County, Texas 79701 6316

TCEQ Region: REGION 07 - MIDLAND

ID Number(s):

PETROLEUM STORAGE TANK REGISTRATION
REGISTRATION 7750

LEAKING PETROLEUM STORAGE TANKS REMEDIATION
ID NUMBER 119555

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

Date Compliance History Report Prepared: March 29, 2022

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: March 29, 2017 to March 29, 2022

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

Name: Sarah Smith

Phone: (512) 239-4495

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	October 23, 2018	(1524335)
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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:



Compliance History Report

Compliance History Report for CN604019786, RN102219433, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent, or Owner/Operator: CN604019786, Pilot Thomas Logistics LLC **Classification:** HIGH **Rating:** 0.09

Regulated Entity: RN102219433, Pilot Thomas Logistics Card-Lock # 8612 **Classification:** HIGH **Rating:** 0.00

Complexity Points: 3 **Repeat Violator:** NO

CH Group: 14 - Other

Location: 803 Hobbs Highway, Seminole, Gaines County, Texas 79360

TCEQ Region: REGION 07 - MIDLAND

ID Number(s):

PETROLEUM STORAGE TANK REGISTRATION
REGISTRATION 46209

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

Date Compliance History Report Prepared: March 29, 2022

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: March 29, 2017 to March 29, 2022

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

Name: Sarah Smith

Phone: (512) 239-4495

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 18, 2018	(1455746)
Item 2	November 27, 2018	(1531051)

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
PILOT THOMAS LOGISTICS LLC DBA
PILOT THOMAS LOGISTICS CARD-LOCK
8622 AND PILOT THOMAS LOGISTICS
CARD-LOCK # 8612;
RN102243185 AND RN102219433**

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**BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY**

AGREED ORDER

DOCKET NO. 2021-1446-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 Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card-Lock # 8622 and Pilot Thomas Logistics Card-Lock # 8612 ("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 together stipulate that:

1. Respondent owns and operates, as defined in 30 TEX. ADMIN. CODE § 334.2(78) and (75), two underground storage tanks ("UST") systems and fleet refueling facilities with retail sales of gasoline located at:
 - a. 2410 West Wall Street in Midland, Midland County, Texas (Facility ID No. 7750) ("Facility No. 1") (RN102243185); and
 - b. 803 Hobbs Highway in Seminole, Gaines County, Texas (Facility ID No. 46209) ("Facility No. 2") (RN102219433).

The USTs 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 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 \$12,000 is assessed by the Commission in settlement of the violations alleged in Section II. Respondent paid \$12,000 of the penalty.
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 submitted a properly completed UST registration and self-certification form and was issued a valid, current TCEQ delivery certificate for Facility No. 1 on December 16, 2021, and for Facility No. 2 on November 29, 2021.

II. ALLEGATIONS

1. During an investigation at Facility No. 1, conducted on September 22, 2021, an investigator documented that Respondent:
 - a. Failed to make available to a common carrier a valid, current TCEQ delivery certificate before accepting delivery of a regulated substance into the UST, in violation of TEX. WATER CODE § 26.3467(a) and 30 TEX. ADMIN. CODE § 334.8(c)(5)(A)(i). Specifically, the delivery certificate expired on June 30, 2020, and at least one fuel delivery was received on February 4, 2021, without a valid, current TCEQ delivery certificate; and
 - b. Failed to renew a previously issued UST delivery certificate by submitting a properly completed UST registration and self-certification form at least 30 days before the expiration date, in violation of 30 TEX. ADMIN. CODE § 334.8(c)(4)(A)(vii) and (c)(5)(B)(ii). Specifically, the delivery certificate expired on June 30, 2020.
2. During an investigation at Facility No. 2, conducted on October 20, 2021, an investigator documented that Respondent:
 - a. Failed to make available to a common carrier a valid, current TCEQ delivery certificate before accepting delivery of a regulated substance into the UST, in violation of TEX. WATER CODE § 26.3467(a) and 30 TEX. ADMIN. CODE § 334.8(c)(5)(A)(i). Specifically, the delivery certificate expired on June 30, 2020, and five fuel deliveries were received between September 4, 2021, and October 3, 2021, without a valid, current TCEQ delivery certificate; and
 - b. Failed to renew a previously issued UST delivery certificate by submitting a properly completed UST registration and self-certification form at least 30 days before the expiration date, in violation of 30 TEX. ADMIN. CODE § 334.8(c)(4)(A)(vii) and (c)(5)(B)(ii). Specifically, the delivery certificate expired on June 30, 2020.

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.
2. All relief not expressly granted in this Order is denied.
3. The duties and provisions imposed by this Order shall apply to and be binding upon Respondent.
4. 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.
5. 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.
6. 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

Erin E. Chamallop

For the Executive Director

7/15/24

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.

David Dodson

Signature - David P. Dodson, Vice President
Pilot Thomas Logistics LLC
201 North Rupert Street
Fort Worth, Texas 76107-1432

6-10-2024

Date

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

1051 Mustang Drive, Suite 600 Grapevine, TX 76051
PO Box 2138, Grapevine, TX 76099