

Executive Summary – Enforcement Matter – Case No. 62718
Aziza Investments, Inc. dba C-Store
RN102481025
Docket No. 2022-0959-PST-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

PST

Small Business:

Yes

Location(s) Where Violation(s) Occurred:

C-Store, 3128 McKinney Avenue, Dallas, Dallas County

Type of Operation:

Underground storage tank ("UST") system and a convenience store with retail sales of gasoline

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Past-Due Fees: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: August 29, 2025

Comments Received: No

Penalty Information

Total Penalty Assessed: \$14,252

Amount Deferred for Expedited Settlement: \$2,850

Total Paid to General Revenue: \$342

Total Due to General Revenue: \$11,060

Payment Plan: 35 payments of \$316 each

Compliance History Classifications:

Person/CN - High

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: June 28, 2022

Date(s) of NOE(s): July 22, 2022

Violation Information

Executive Summary – Enforcement Matter – Case No. 62718
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Docket No. 2022-0959-PST-E

1. Failed to investigate and confirm all suspected releases of regulated substances within 30 days. Specifically, Inventory Control ("IC") leak-check results for November 2021 through January of 2022 for the super unleaded tank and for March 2022 through May 2022 for the regular unleaded tank indicate suspected releases that were not investigated [30 TEX. ADMIN. CODE § 334.74].
2. Failed to report a suspected release to the TCEQ within 24 hours of discovery. Specifically, IC leak-check results for November 2021 through January of 2022 for the super unleaded tank and for March 2022 through May 2022 for the regular unleaded tank indicate suspected releases that were not reported [30 TEX. ADMIN. CODE § 334.72].
3. Failed to conduct a walkthrough inspection of the spill prevention and release detection equipment at least once every 30 days [30 TEX. ADMIN. CODE § 334.48(h)(1)(A) and TEX. WATER CODE § 26.3475(c)(1) and (c)(2)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent has implemented the following corrective actions:

- a. Conducted an investigation of the suspected releases and implemented appropriate corrective measures at the Facility by August 12, 2024;
- b. Developed and implemented a process for timely reporting suspected releases at the Facility on June 21, 2024; and
- c. Conducted the 30-day walkthrough inspections of the spill prevention and release detection equipment at the Facility on March 31, 2024.

Technical Requirements:

N/A

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Eunice Adegelu, Enforcement Division, Enforcement Team 3, MC R-12, (512) 239-5082; Michael Parrish, Enforcement Division, MC R-12, (512) 239-2548

Respondent: Amyn Bhagat, President, Aziza Investments, Inc., 13704 Adare Manor Lane, Frisco, Texas 75035

Ameena Ali, Vice President, Aziza Investments, Inc., 13704 Adare Manor Lane, Frisco, Texas 75035

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	26-Jul-2022	Screening	4-Aug-2022	EPA Due	
	PCW	26-Sep-2024				

RESPONDENT/FACILITY INFORMATION						
Respondent	Aziza Investments, Inc. dba C-Store					
Reg. Ent. Ref. No.	RN102481025					
Facility/Site Region	4-Dallas/Fort Worth			Major/Minor Source	Minor	

CASE INFORMATION					
Enf./Case ID No.	62718		No. of Violations	3	
Docket No.	2022-0959-PST-E		Order Type	1660	
Media Program(s)	Petroleum Storage Tank		Government / Non-Profit	No	
Multi-Media			Enf. Coordinator	Eunice Adegele	
			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	\$17,500
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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	-\$1,750
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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	-\$1,750
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Economic Benefit	0.0 %	Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$457	<i>*Capped at the Total EB \$ Amount</i>
Estimated Cost of Compliance	\$1,950	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$14,000
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OTHER FACTORS AS JUSTICE MAY REQUIRE	1.8 %	Adjustment	\$252
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes	Enhancement to capture the avoided cost of compliance associated with Violation Nos. 2 and 3.			
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Final Penalty Amount	\$14,252
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$14,252
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DEFERRAL	20.0 %	Reduction	Adjustment	-\$2,850
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes	Deferral offered for expedited settlement.			
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PAYABLE PENALTY	\$11,402
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Screening Date	4-Aug-2022	Docket No.	2022-0959-PST-E	PCW
Respondent	Aziza Investments, Inc. dba C-Store			Policy Revision 5 (January 28, 2021)
Case ID No.	62718			PCW Revision February 11, 2021
Reg. Ent. Reference No.	RN102481025			
Media	Petroleum Storage Tank			
Enf. Coordinator	Eunice Adegele			

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-Aug-2022	Docket No.	2022-0959-PST-E	PCW
Respondent	Aziza Investments, Inc. dba C-Store			Policy Revision 5 (January 28, 2021)
Case ID No.	62718			PCW Revision February 11, 2021
Reg. Ent. Reference No.	RN102481025			
Media	Petroleum Storage Tank			
Enf. Coordinator	Eunice Adegele			
Violation Number	1			
Rule Cite(s)	30 Tex. Admin. Code § 334.74			
Violation Description	Failed to investigate and confirm all suspected releases of regulated substances requiring reporting under 30 Tex. Admin. Code § 334.72 (relating to Reporting of Suspected Releases) within 30 days. Specifically, Inventory Control ("IC") leak-check results for November 2021 through January of 2022 for the super unleaded tank and for March 2022 through May 2022 for the regular unleaded tank indicate suspected releases that were not investigated.			
	Base Penalty	\$25,000		

>> Environmental, Property and Human Health Matrix					
OR	Release	Major	Harm Moderate	Minor	
	Actual				
	Potential	x			Percent 15.0%

>> Programmatic Matrix					
	Falsification	Major	Moderate	Minor	
					Percent 0.0%
Matrix Notes	Human health or the environment will or could be exposed to pollutants that would exceed levels that are protective of human health or environmental receptors as a result of the violation.				
	Adjustment	\$21,250			
					\$3,750

Violation Events					
Number of Violation Events		3	186	Number of violation days	
	daily				
	weekly				
	monthly				
	quarterly	x			Violation Base Penalty \$11,250
	semiannual				
	annual				
	single event				
	Three quarterly events are recommended from the earliest suspected release investigation due date of January 30, 2022 to the August 4, 2022 screening date.				

Good Faith Efforts to Comply	10.0 %	Reduction	\$1,125
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
Extraordinary			
Ordinary		x	
N/A			
Notes	The Respondent came into compliance by August 12, 2024, after the July 22, 2022 Notice of Enforcement ("NOE").		
	Violation Subtotal	\$10,125	

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount	\$177
Violation Final Penalty Total	\$9,162
This violation Final Assessed Penalty (adjusted for limits)	\$9,162

Economic Benefit Worksheet

Respondent Aziza Investments, Inc. dba C-Store
Case ID No. 62718
Reg. Ent. Reference No. RN102481025
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				0.00	\$0	n/a	\$0
Other (as needed)	\$1,400	30-Jan-2022	12-Aug-2024	2.53	\$177	n/a	\$177

Notes for DELAYED costs

Estimated delayed cost (\$800 for testing two tanks plus line tightness testing and \$600 for the Release Determination Report) to conduct an investigation of the suspected releases and implement appropriate corrective measures. The Date Required is the earliest suspected release investigation due date, 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

\$1,400

TOTAL

\$177

Screening Date	4-Aug-2022	Docket No.	2022-0959-PST-E	PCW
Respondent	Aziza Investments, Inc. dba C-Store	Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021		
Case ID No.	62718			
Reg. Ent. Reference No.	RN102481025			
Media	Petroleum Storage Tank			
Enf. Coordinator	Eunice Adegele			
Violation Number	2			
Rule Cite(s)	30 Tex. Admin. Code § 334.72			
Violation Description	Failed to report a suspected release to the TCEQ within 24 hours of discovery. Specifically, IC leak-check results for November 2021 through January of 2022 for the super unleaded tank and for March 2022 through May 2022 for the regular unleaded tank indicate suspected releases that were not reported.			
		Base Penalty	\$25,000	

>> Environmental, Property and Human Health Matrix

OR		Harm			
	Release	Major	Moderate	Minor	
	Actual				Percent 0.0%
	Potential				

>> Programmatic Matrix

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

\$2,500

Violation Events

Number of Violation Events	2	215	Number of violation days
	daily		Violation Base Penalty \$5,000
	weekly		
	monthly		
	quarterly		
	semiannual		
	annual		
	single event	x	
Two single events are recommended (one for each UST in which a suspected release occurred).			

Good Faith Efforts to Comply

	10.0%	
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		x
N/A		
Notes	The Respondent came into compliance by June 21, 2024, after the July 22, 2022 NOE.	
Violation Subtotal		\$4,500

Economic Benefit (EB) for this violation

	Statutory Limit Test
Estimated EB Amount	\$61
Violation Final Penalty Total	\$4,072
This violation Final Assessed Penalty (adjusted for limits) \$4,072	

Economic Benefit Worksheet

Respondent Aziza Investments, Inc. dba C-Store
Case ID No. 62718
Reg. Ent. Reference No. RN102481025
Media Petroleum Storage Tank
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering / Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training / Sampling				0.00	\$0	n/a	\$0
Remediation / Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$100	28-Jun-2022	21-Jun-2024	1.98	\$10	n/a	\$10

Notes for DELAYED costs

Estimated delayed cost to develop and implement a process for timely reporting suspected releases. The Date Required is the investigation date, 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	\$25	1-Jan-2022	4-Aug-2022	0.59	\$1	\$25	\$26
Other (as needed)	\$25	1-May-2022	4-Aug-2022	0.26	\$0	\$25	\$25

Notes for AVOIDED costs

Estimated avoided cost to report the suspected releases. The Dates Required are the dates the suspected releases should have been reported, and the Final Dates are the screening date.

Approx. Cost of Compliance

\$150

TOTAL

\$61

Screening Date 4-Aug-2022 Respondent Aziza Investments, Inc. dba C-Store Case ID No. 62718 Reg. Ent. Reference No. RN102481025 Media Petroleum Storage Tank Enf. Coordinator Eunice Adegele	Docket No. 2022-0959-PST-E Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021	PCW
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Violation Number	3		
Rule Cite(s)		30 Tex. Admin. Code § 334.48(h)(1)(A) and Tex. Water Code § 26.3475(c)(1) and (c)(2)	
Violation Description	Failed to conduct a walkthrough inspection of the spill prevention and release detection equipment at least once every 30 days.		

Base Penalty	\$25,000
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> > Environmental, Property and Human Health Matrix

OR		Harm			
	Release	Major	Moderate	Minor	
	Actual				
	Potential		x		Percent 5.0%

> > Programmatic Matrix

Matrix Notes		Falsification			
		Major	Moderate	Minor	
					Percent 0.0%
	Human health or the environment will or could be exposed to significant amounts of pollutants that would not exceed levels that are protective of human health or environmental receptors as a result of the violation.				

Adjustment	\$23,750
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Adjustment	\$1,250
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Violation Events

Number of Violation Events	1	37	Number of violation days
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	daily						
	weekly						
	monthly						
	quarterly		x				
	semiannual						
	annual						
	single event						

Violation Base Penalty	\$1,250
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One quarterly event is recommended from the June 28, 2022 investigation date to the August 4, 2022 screening date.	
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Good Faith Efforts to Comply

	10.0 %	
		Reduction \$125

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
Extraordinary			
Ordinary		x	
N/A			

	Notes: The Respondent came into compliance by March 31, 2024, after the July 22, 2022 NOE.
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Violation Subtotal	\$1,125
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Economic Benefit (EB) for this violation

	\$219	
Estimated EB Amount		Violation Final Penalty Total \$1,018

This violation Final Assessed Penalty (adjusted for limits)	\$1,018
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Economic Benefit Worksheet

Respondent Aziza Investments, Inc. dba C-Store
Case ID No. 62718
Reg. Ent. Reference No. RN102481025
Media Petroleum Storage Tank
Violation No. 3

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)	\$200	28-Jun-2022	31-Mar-2024	1.76	\$18	n/a	\$18

Notes for DELAYED costs

Estimated delayed cost to conduct the 30-day walkthrough inspections of the spill prevention equipment (\$100) and release detection equipment (\$100). The Date Required is the investigation date, 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	\$200	28-Jun-2022	4-Aug-2022	0.10	\$1	\$200	\$201
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Estimated avoided cost to conduct the 30-day walkthrough inspections of the spill prevention equipment (\$100) and release detection equipment (\$100). The Date Required is the investigation date, and the Final date is the screening date.

Approx. Cost of Compliance

\$400

TOTAL

\$219



Compliance History Report

Compliance History Report for CN602935454, RN102481025, Rating Year 2023 which includes Compliance History (CH) components from September 1, 2018, through August 31, 2023.

Customer, Respondent, or Owner / Operator:	CN602935454, Aziza Investments, Inc.	Classification:	HIGH	Rating:	0.00
Regulated Entity:	RN102481025, C-STORE	Classification:	HIGH	Rating:	0.00
Complexity Points:	4	Repeat Violator:	NO		
CH Group:	14 - Other				
Location:	3128 MCKINNEY AVENUE, DALLAS, DALLAS COUNTY, TEXAS 75204-2465				
TCEQ Region:	REGION 04 - DFW METROPLEX				
ID Number(s):	PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 46705				
Compliance History Period:	September 01, 2018 to August 31, 2023	Rating Year:	2023	Rating Date:	09/01/2023
Date Compliance History Report Prepared:	August 28, 2024				
Agency Decision Requiring Compliance History:	Enforcement				
Component Period Selected:	August 28, 2019 to August 28, 2024				
TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.					
Name:	Eunice Adegelu		Phone:	(512) 239-5082	

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 14, 2020 (1683527)

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

AZIZA INVESTMENTS, INC. DBA C-
STORE

RN102481025

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BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2022-0959-PST-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Aziza Investments, Inc. dba C-Store (the "Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates, as defined in 30 TEX. ADMIN. CODE § 334.2(78) and (75), an underground storage tank ("UST") system and a convenience store with retail sales of gasoline located at 3128 McKinney Avenue in Dallas, Dallas County, Texas (the "Facility"). The UST system at the Facility is not exempt or excluded from regulation under the Texas Water Code or the rules of the Commission, and contains or contained a regulated petroleum substance as defined in the rules of the TCEQ.
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 \$14,252 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$342 of the penalty and \$2,850 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 contained in this Order.

The remaining amount of \$11,060 of the undeferred penalty shall be paid in 35 monthly payments of \$316 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 has implemented the following corrective actions at the Facility:
 - a. Conducted an investigation of the suspected releases and implemented appropriate corrective measures at the Facility by August 12, 2024;
 - b. Developed and implemented a process for timely reporting suspected releases at the Facility on June 21, 2024; and
 - c. Conducted the 30-day walkthrough inspections of the spill prevention and release detection equipment at the Facility on March 31, 2024.

II. ALLEGATIONS

During an investigation at the Facility conducted on June 28, 2022, an investigator documented that the Respondent:

1. Failed to investigate and confirm all suspected releases of regulated substances requiring reporting under 30 TEX. ADMIN. CODE § 334.72 (relating to Reporting of Suspected Releases) within 30 days, in violation of 30 TEX. ADMIN. CODE § 334.74. Specifically, Inventory Control ("IC") leak-check results for November 2021 through January of 2022 for the super unleaded tank and for March 2022 through May 2022 for the regular unleaded tank indicate suspected releases that were not investigated.

2. Failed to report a suspected release to the TCEQ within 24 hours of discovery, in violation of 30 TEX. ADMIN. CODE § 334.72. Specifically, IC leak-check results for November 2021 through January of 2022 for the super unleaded tank and for March 2022 through May 2022 for the regular unleaded tank indicate suspected releases that were not reported.
3. Failed to conduct a walkthrough inspection of the spill prevention and release detection equipment at least once every 30 days, in violation of 30 TEX. ADMIN. CODE § 334.48(h)(1)(A) and TEX. WATER CODE § 26.3475(c)(1) and (c)(2).

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: Aziza Investments, Inc. dba C-Store, Docket No. 2022-0959-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. 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 the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
4. 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.
5. 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.

6. 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.
7. 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

Krista Mello-Jurack

For the Executive Director

Date

10/26/2025

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, if any, 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 submitted;
- Referral of this case to the OAG 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 OAG of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

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

Ameena

Signature

9-29-2025

Date

Ameena Ali

Name (Printed or typed)
Authorized Representative of
Aziza Investments, Inc. dba C-Store

Vice President

Title

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