Executive Summary – Enforcement Matter – Case No. 66434 BHARWANI INVESTMENT GROUP INC dba Kulsum's Chevron RN102469707 Docket No. 2024-1191-PST-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A **Media:** PST

Small Business:

Yes

Location(s) Where Violation(s) Occurred:

Kulsum's Chevron, 2525 North Josey Lane, Carrollton, 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 1, 2025

Comments Received: No

Penalty Information

Total Penalty Assessed: \$27,554

Amount Deferred for Expedited Settlement: \$5,510

Total Paid to General Revenue: \$624 Total Due to General Revenue: \$21,420

Payment Plan: 35 payments of \$612 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 12, 2024

Date(s) of NOE(s): July 17, 2024

Executive Summary – Enforcement Matter – Case No. 66434 BHARWANI INVESTMENT GROUP INC dba Kulsum's Chevron RN102469707 Docket No. 2024-1191-PST-E

Violation Information

- 1. 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 previous delivery certificate expired on July 31, 2023 [30 Tex. ADMIN. CODE § 334.8(c)(4)(A)(vii) and (c)(5)(B)(ii)].
- 2. Failed to make available to a common carrier a valid, current TCEQ delivery certificate before accepting delivery of a regulated substance into the USTs. Specifically, the Respondent accepted approximately 76 unauthorized fuel deliveries from August 2023 to May 2024 without a valid, current TCEQ delivery certificate [30 Tex. ADMIN. CODE § 334.8(c)(5)(A)(i) and Tex. WATER CODE § 26.3467(a)].
- 3. Failed to provide corrosion protection to all underground and/or totally or partially submerged metal components of any existing UST system which are designed or used to convey, contain, or store regulated substances. Specifically, the metal components located inside the submersible turbine pump ("STP") containment sumps for dispensers 1/2, 5/6, and 7/8 were in direct contact with water and did not have corrosion protection installed [30 Tex. ADMIN. CODE § 334.49(a)(4) and Tex. WATER CODE § 26.3475(d)].
- 4. Failed to monitor the USTs in a manner which will detect a release at a frequency of at least once every 30 days [30 Tex. ADMIN. CODE § 334.50(b)(1)(A) and Tex. WATER CODE § 26.3475(c)(1)].
- 5. Failed to conduct effective inventory control procedures for all USTs. Specifically, the Respondent incorrectly recorded fuel deliveries in their inventory control records as net volumes when they should have been recorded as gross volumes [30 Tex. ADMIN. CODE § 334.48(c) and Tex. Water Code § 26.3475(c)(1)].
- 6. Failed to report a suspected release to the TCEQ within 24 hours of discovery. Specifically, failing monthly inventory control records for the super unleaded tank from August 2023 and September 2023, December 2023 and January 2024, and April 2024, and May 2024 and failing monthly inventory control records for the diesel tank from August 2023 and September 2023 indicated suspected releases that were not reported [30 Tex. Admin. Code § 334.72].
- 7. Failed to investigate and confirm all suspected releases of regulated substances within 30 days. Specifically, failing monthly inventory control records for the super unleaded tank from August 2023 and September 2023, December 2023 and January 2024, and April 2024, and May 2024 and failing monthly inventory control records for the diesel tank from August 2023 and September 2023 indicated suspected releases that were not investigated [30 Tex. Admin. Code § 334.74].

Executive Summary – Enforcement Matter – Case No. 66434 BHARWANI INVESTMENT GROUP INC dba Kulsum's Chevron RN102469707 Docket No. 2024-1191-PST-E

8. Failed to conduct the walkthrough inspections of the UST system's release detection equipment at least once every 30 days [30 Tex. Admin. Code § 334.48(h)(1)(A)(ii) and Tex. Water Code § 26.3475(c)(1)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

On June 13, 2024, the Respondent submitted a properly completed UST registration and self-certification form for the Facility and obtained a valid, current TCEQ delivery certificate.

Technical Requirements:

The Order will require the Respondent to:

- a. Within 30 days:
- i. Install and test a corrosion protection system for the metal components located inside the STP containment sumps;
- ii. Implement a release detection method for the USTs, including but not limited to conducting proper inventory control procedures for all USTs;
- iii. Develop and implement a process for reporting suspected releases timely;
- iv. Conduct investigations of the suspected releases and implement appropriate corrective measures; and
- v. Begin conducting 30-day walkthrough inspections of the release detection equipment.
- b. Within 45 days, submit written certification to demonstrate compliance with a.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Celicia Garza, Enforcement Division, Enforcement Team 6, MC R-13, (210) 657-8422; Michael Parrish, Enforcement Division, MC R-12, (512) 239-2548

Respondent: Azad Akbar, President, BHARWANI INVESTMENT GROUP INC, 2525

North Josey Lane, Carrollton, Texas 75006-1618

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021

Major/Minor Source Minor

DATES Assigned 22-Jul-2024

PCW 15-Aug-2025 Screening 22-Jul-2024 EPA Due

RESPONDENT/FACILITY INFORMATION

Facility/Site Region 4-Dallas/Fort Worth

Respondent BHARWANI INVESTMENT GROUP INC dba Kulsum's Chevron

Reg. Ent. Ref. No. RN102469707

CASE INFORMATION

Enf./Case ID No. Docket No. Docket No. Docket No. Docket No. Media Program(s) Multi-Media Multi-Media

Admin. Penalty \$ Limit Minimum \$0 Maximum \$25,000

			Penalty	v Calcula	tion Section			
тота	L BASE PEN	ALTY (Su	m of violation l	•		J11	Subtotal 1	\$32,500
ADJU	STMENTS (+	/-) TO S	UBTOTAL 1					
	Subtotals 2-7 are of Compliance Hi		Itiplying the Total Base P	enalty (Subtotal 1 -10.0%	 by the indicated p Adjustment 		otals 2, 3, & 7	-\$3,250
	Notes		Reduction for H	igh Performer	Classification.			
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	1	he Respondent does	s not meet the	culpability crite	eria.		
	Good Faith Eff	ort to Con	nply Total Adjustm	ents			Subtotal 5	-\$1,875
		Total EB Ar	Ψ102			Amount	Subtotal 6	\$0
SUM (OF SUBTOTA	LS 1-7				F	inal Subtotal	\$27,375
				RE	0.7%		Adjustment	\$179
	Notes		nent to capture the a			sociated with		
						Final Per	nalty Amount	\$27,554
STAT	The Respondent does not meet the culpability criteria. Good Faith Effort to Comply Total Adjustments Economic Benefit Total EB Amounts Estimated Cost of Compliance \$482		\$27,554					
	RRAL the Final Assessed Pe	enalty by the i	ndicated percentage.		20.0%	Reduction	Adjustment	-\$5,510
	Notes		Deferral offere	d for expedite	d settlement.			
PAYA	BLE PENALT	Υ						\$22,044

PCW

Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021

Respondent BHARWANI INVESTMENT GROUP INC dba Kulsum's Chevron

Case ID No. 66434

Reg. Ent. Reference No. RN102469707

Media Petroleum Storage Tank

Enf. Coordinator Celicia Garza

	C		Compliance History Worksheet		
>>	CO	mpilance Hist	ory <i>Site</i> Enhancement (Subtotal 2) 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	0	0%
			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	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%
		and Consent 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	0	0%
		Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
		Emissions	Chronic excessive emissions events (number of events)	0	0%
		Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were 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%
			<u> </u>		
			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%
		2	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 Perd	centage (Sub	ototal 2) 0%
>>	Re	peat Violator	(Subtotal 3)		
		No	Adjustment Pero	centage (Sub	ototal 3) 0%
>>	Co	mpliance Hist	ory Person Classification (Subtotal 7)		
		High Perf	ormer Adjustment Pero	centage (Sub	ototal 7) -10%
>>	Co	mpliance Hist	ory Summary		
		Compliance History Notes	Reduction for High Performer Classification.		
>>	Fina	Il Compliance	Total Compliance History Adjustment Percentage (S History Adjustment	Subtotals 2,	3, & 7) -10%
			Final Adjustment Percenta	ige *capped	at 100% -10%

	Screening Date	22-Jul-2024 Docket No. 20		PCW
	-	BHARWANI INVESTMENT GROUP INC dba Kulsum's Ch	evron <i>Policy</i>	Revision 5 (January 28, 2021)
	Case ID No.		PC	W Revision February 11, 2021
Reg.	Ent. Reference No.			
		Petroleum Storage Tank		
	Enf. Coordinator			
	Violation Number	1		1
	Rule Cite(s)	30 Tex. Admin. Code § 334.8(c)(4)(A)(vii)	and (c)(5)(B)(ii)	
	Violation Description	Failed to renew a previously issued underground stor certificate by submitting a properly completed US certification form at least 30 days before the expirati previous delivery certificate expired on J	T registration and self- ion date. Specifically, the	
			Base Penalty	\$25,000
>> Fpv	/ironmental Prope	rty and Human Health Matrix		
LIII	in omnerman, i rope	Harm		
	Release	Major Moderate Minor		
OR	Actua			
	Potentia	Pe	ercent 0.0%	
_				
>>Pro	grammatic Matrix	Major Moderate Minor		
	Falsification	Major Moderate Minor	ercent 10.0%	
		X	10.0%	
	Matrix	100% of the rule requirement was not me	•	
	Notes	10070 of the rate requirement was not me	•	
		Adjus	tment \$22,500	
				\$2,500
Violati	on Events			
Violatio	on Events			
	Number of	/iolation Events 1 318 Nu	umber of violation days	
		daily		
		weekly		
		monthly		
		quarterly	Violation Base Penalty	\$2,500
		semiannual		
		annual x		
		single event		
				1
	One annu	al event is recommended from the July 31, 2023 expirate		
		delivery certificate to the June 13, 2024 date of co	mpliance.	
Good F	aith Efforts to Con		Reduction	\$625
		Before NOE/NOV NOE/NOV to EDPRP/Settlement	Offer	
		Extraordinary		
		Ordinary x		
		N/A		
		The Respondent achieved compliance	e on June 13,	
		Notes 2024, prior to the July 17, 2024 Notice		
		("NOE").		
			Violation Subtotal	\$1,875
Econor	mic Benefit (EB) fo	this violation Si	tatutory Limit Test	
	Estimat	ed EB Amount \$2 Vio	lation Final Penalty Total	\$1,636
			_	
		This violation Final Assessed Per	naity (adjusted for limits)	\$1,636

	E	conomic	Benefit	Wor	ksheet		
Respondent	BHARWANI IN	VESTMENT GROU	P INC dba Kulsu	m's Che	evron		
Case ID No.	66434						
Reg. Ent. Reference No.							
	Petroleum Sto						Years of
Violation No.		rage raine				Percent Interest	Depreciation
Violation No.							
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item 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				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	21 1.1 2022	12 lun 2024	0.00	\$0 \$2	n/a	\$0 \$2
Other (as needed)	\$40	31-Jul-2023	13-Jun-2024	0.87	\$2	n/a	\$2
Notes for DELAYED costs	completed US	T registration and	self-certification	n form a	it least 30 days be d delivery certificat	tificate by submitting fore the expiration of the and the Final Date	date. The Date
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)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$40			TOTAL		\$2

	Screening Date				cet No. 2024-1191-PST-E		PCW
	Respondent	BHARWANI INV	ESTMENT GR	OUP INC dba Kı	Ilsum's Chevron	Policy Re	evision 5 (January 28, 2021)
	Case ID No.	66434				PCW	Revision February 11, 2021
Reg.	Ent. Reference No.	RN102469707					
	Media	Petroleum Stora	age Tank				
	Enf. Coordinator		3				
	Violation Number						
	Rule Cite(s)						
	nuis enega	30 Tex. Adı	min. Code § 3	34.8(c)(5)(A)(i)	and Tex. Water Code § 26.346	57(a)	
		Failed to m	nake available	to a common c	arrier a valid, current TCEQ deli	verv	
					regulated substance into the U		
	Violation Description				ximately 76 unauthorized fuel o		
		from August 2	2023 to May 2	2024 without a v	alid, current TCEQ delivery cer	tificate.	
					Base	Penalty	\$25,000
	.:			B.4 - + :			
>> En	vironmental, Propei	ty and Hum		Matrix			
	Release	Major	Harm Moderate	Minor			
OR	Actual		Wioderate	Williel			
O.K	Potential				Percent 0.0%		
	i oteritiai				reiteit 0.0%		
>>Pro	grammatic Matrix						
	Falsification	Major	Moderate	Minor			
		X			Percent 10.0%		
					10.070		
	Matrix	10	00% of the rul	e requirement v	vas not met.		
	Notes						
					Adjustment	\$22,500	
							\$2,500
Violati	on Events						
	Number of V	/iolation Events	2	I -	302 Number of violation d	01/6	
	Number of v	iolation Events		ı <u>L</u>	Number of violation d	ays	
		daily					
		weekly					
		monthly					
		quarterly			Violation Base	Penalty	\$5,000
		semiannual			Violation base	r charty_	\$3,000
		annual	X				
		single event		i			
					of August 1, 2023 to May 29, 2		
	which f	uel deliveries we	ere accepted v	without a valid,	current TCEQ delivery certificat	e.	
Good F	Faith Efforts to Com	ply	25.0%		R	eduction	\$1,250
Good F		В	25.0% Before NOE/NOV	NOE/NOV to EDPR	R P/Settlement Offer	eduction	\$1,250
Good F				NOE/NOV to EDPR		eduction	\$1,250
Good F		В		NOE/NOV to EDPF		eduction	\$1,250
Good F		B Extraordinary	Sefore NOE/NOV	NOE/NOV to EDPF		eduction	\$1,250
Good F		B Extraordinary Ordinary	efore NOE/NOV X		P/Settlement Offer	eduction	\$1,250
Good F		B Extraordinary Ordinary	x The Respond	dent achieved co	P/Settlement Offer pmpliance on June 13, 2024,	eduction	\$1,250
Good F		B Extraordinary Ordinary N/A	x The Respond		P/Settlement Offer pmpliance on June 13, 2024,	eduction	\$1,250
Good F		B Extraordinary Ordinary N/A	x The Respond	dent achieved co	P/Settlement Offer pmpliance on June 13, 2024,	eduction	\$1,250
Good F		B Extraordinary Ordinary N/A	x The Respond	dent achieved co	ompliance on June 13, 2024, 17, 2024 NOE.		\$1,250 \$3,750
Good F		B Extraordinary Ordinary N/A	x The Respond	dent achieved co	P/Settlement Offer pmpliance on June 13, 2024,		
		B Extraordinary Ordinary N/A Notes	x The Respond	dent achieved co	ompliance on June 13, 2024, 17, 2024 NOE.	Subtotal	
	raith Efforts to Com	Extraordinary Ordinary N/A Notes	x The Respond	dent achieved co	pympliance on June 13, 2024, 17, 2024 NOE. Violation Statutory Limit	Subtotal Test	\$3,750
	raith Efforts to Com	B Extraordinary Ordinary N/A Notes	x The Respond	dent achieved co	prysettlement Offer property of the second s	Subtotal Test	
	raith Efforts to Com	Extraordinary Ordinary N/A Notes	The Respond	dent achieved co prior to the July	pympliance on June 13, 2024, 17, 2024 NOE. Violation Statutory Limit	Subtotal Test Ity Total	\$3,750

Economic Benefit Worksheet										
Respondent	BHARWANI IN	IVESTMENT GROUI	P INC dba Kulsu	ım's Che	evron					
Case ID No.	66434									
Reg. Ent. Reference No.	RN102469707	7								
Media Violation No.	Petroleum Sto 2	orage Tank				Percent Interest	Years of Depreciation			
						5.0	15			
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount			
Item 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				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					led in Violation No.					
Avoided Costs	ANNU	ALIZE avoided c	osts before er			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				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			

	Scree	ening Date	22-Jul-2024		Do	cket No.	2024-1191-PST-E		PCW
	R	espondent	BHARWANI INV	ESTMENT GR	OUP INC dba	Kulsum's Cl	hevron	Policy R	evision 5 (January 28, 2021)
	C	ase ID No.	66434					PCW	/ Revision February 11, 2021
Reg.	Ent. Refe	erence No.	RN102469707						
		Media	Petroleum Stora	age Tank					
	Enf. Co	oordinator	Celicia Garza						
	Viola	tion Number	3						
		Rule Cite(s)	30 Tex A	dmin Code 8	334 49(a)(4) and Tex V	Water Code § 26.347	'5(d)	
			-			_	ound and/or totally o		
							system which are des nces. Specifically, th		
	Violation	n Description		•	0		pump ("STP") conta		
			-				ct contact with wate		
				not ha	ave corrosion	protection in	nstalled.		
							Bas	e Penalty	\$25,000
>> Fn:	/ironmer	ntal Proper	rty and Hum	an Haalth	Matrix				
// LIN	vii Oriiriei	ital, Fropei	ty and main	Harm	Watiix				
		Release	Major	Moderate	Minor				
OR		Actual						•	
		Potential	Х				Percent 15.0%		
_									
>>Pro	gramma	tic Matrix	NA-1	N 4 = -l = + -	N 45				
	Ĭ	Falsification	Major	Moderate	Minor		Percent 0.0%]	
	<u> </u>						0.0%		
	l l								
	Matrix	Human healt	h or the environ	ment will or d	ould be expo	sed to pollut	tants that would exce	eed levels	
	Notes	that are p	rotective of hum	an health or	environmenta	al receptors	as a result of the vic	olation.	
	<u> </u>								
						Adi	justment	\$21,250	
						•		, ,	
									\$3,750
\/:-I-+:	F	_							
violatio	on Event	S							
		Number of \	/iolation Events	1	ī	40	Number of violation	days	
		rearriber of e	riolation Events		1 1	40	ramber of violation	aays	
			daily						
			weekly						
			monthly						
			quarterly	Х			Violation Bas	e Penalty	\$3,750
			semiannual						
			annual						
			single event						
	li li								
		One quarter	ly event is recor	nmended fror	m the June 12	2, 2024 inve	stigation date to the	July 22,	
				2024	4 screening d	ate.			
	Ц								
Good F	aith Effo	orts to Com	ply	0.0%				Reduction	\$0
				efore NOE/NOV	NOE/NOV to El	DPRP/Settleme	nt Offer		
			Extraordinary						
			Ordinary						
			N/A	Х			4		
				The Despens	lant door not	most the go	and faith critoria for		
			Notes	rne kespond		violation.	ood faith criteria for		
					ulis	oidtioii.			
			•						*
							Violation	n Subtotal	\$3,750
Fconor	nic Rene	fit (FR) for	this violation	on			Statutory Limit	t Test	
_551101	o Denie	(25) 101	violatic				Claratory Emili	. 1001	
		Estimate	ed EB Amount		\$195	•	Violation Final Pen	alty Total	\$3,397
					=				*0.00=
				This vio	lation Final	Accessed F	Penalty (adjusted f	or limits)	\$3,397

	E	conomic	Benefit	Wor	ksheet		
Respondent	BHARWANI IN	VESTMENT GROU	P INC dba Kulsu	m's Che	evron		
Case ID No.	66434						
Rea. Ent. Reference No.	RN102469707						
	Petroleum Sto						Years of
Violation No.		3.				Percent Interest	Depreciation
11010110111101						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
rtem bescription							
Delayed Costs							
Equipment	\$3,000	12-Jun-2024	18-May-2025	0.93	\$9	\$186	\$195
Buildings	40 7000	12 0011 2021	TO May Loco	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	inside the S1	P containment su	mps. The Date estimate	Require d date d	ed is the investigat of compliance.	for the metal compo ion date and the Fir	al Date 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				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0 \$0	\$0 \$0
Other (as needed) Notes for AVOIDED costs				0.00	\$0	1 \$0	\$0
Approx. Cost of Compliance		\$3,000			TOTAL		\$195

	Screening Date		PCW
			Revision 5 (January 28, 2021)
	Case ID No		W Revision February 11, 2021
Reg. E	nt. Reference No		
		Petroleum Storage Tank	
	Enf. Coordinator		
	Violation Number		-
	Rule Cite(s)		
		26.3475(c)(1)	4
		Failed to monitor the USTs in a manner which will detect a release at a frequency of	
		at least once every 30 days. Also, failed to conduct effective inventory control	
	Violation Description		
		recorded fuel deliveries in their inventory control records as net volumes when they should have been recorded as gross volumes.	
		Should have been recorded as gross volumes.	
			405.000
		Base Penalty	\$25,000
>> Envi	ronmental, Prope	rty and Human Health Matrix	
	_	Harm	
	Release		
OR	Actua		
	Potentia	X Percent 15.0%	
>> Progr	rammatic Matrix		
>>Pi ogi	Falsification	Major Moderate Minor	
	raisineation	Percent 0.0%	
	<u> </u>		
			1
		th or the environment will or could be exposed to pollutants that would exceed levels	
	Notes that are	protective of human health or environmental receptors as a result of the violation.	
		Adjustment \$21,250	
			\$3,750
			ψ0,700
Violation	n Events		
	Number of	Violation Events 1 40 Number of violation days	
		4-21.	
		daily weekly	
		monthly	\$3.750
			\$3,750
		monthly quarterly x Violation Base Penalty	\$3,750
		monthly quarterly x Violation Base Penalty semiannual	\$3,750
		monthly quarterly x Violation Base Penalty semiannual annual	\$3,750
	One quarte	monthly quarterly x Violation Base Penalty semiannual annual single event	\$3,750
	One quarte	monthly quarterly x Violation Base Penalty semiannual annual	\$3,750
	One quarte	monthly quarterly x Violation Base Penalty semiannual annual single event Violation Base Penalty violation Violation Base Penalty violation Violation Base Penalty violation Viol	\$3,750
Good Fa		monthly quarterly x Violation Base Penalty semiannual annual single event Violation Base Penalty 22, 2024 screening date.	
Good Fa	One quarte	monthly quarterly x Violation Base Penalty semiannual annual single event Violation Base Penalty 22, 2024 screening date.	
Good Fa		monthly quarterly x Violation Base Penalty semiannual annual single event Violation Base Penalty 22, 2024 screening date. Poly 0.0% Reduction	
Good Fa		monthly quarterly x Violation Base Penalty semiannual annual single event viy event is recommended from the June 12, 2024 investigation date to the July 22, 2024 screening date. Poly 0.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
Good Fa		monthly quarterly x Violation Base Penalty semiannual annual single event rly event is recommended from the June 12, 2024 investigation date to the July 22, 2024 screening date. ply 0.0% Reduction Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary	
Good Fa		monthly quarterly x semiannual annual single event Try event is recommended from the June 12, 2024 investigation date to the July 22, 2024 screening date. The ply 0.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x	
Good Fa		monthly quarterly x semiannual annual single event Try event is recommended from the June 12, 2024 investigation date to the July 22, 2024 screening date. The Respondent does not meet the good faith criteria for	
Good Fa		monthly quarterly x semiannual annual single event Try event is recommended from the June 12, 2024 investigation date to the July 22, 2024 screening date. Poly 0.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x The Respondent does not meet the good faith criteria for	
Good Fa		monthly quarterly x semiannual annual single event with single eve	\$0
	ith Efforts to Con	monthly quarterly x semiannual annual single event Try event is recommended from the June 12, 2024 investigation date to the July 22, 2024 screening date. Poly 0.0% Reduction Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtota	\$0
		monthly quarterly x semiannual annual single event Try event is recommended from the June 12, 2024 investigation date to the July 22, 2024 screening date. Poly 0.0% Reduction Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtota	\$0
	ith Efforts to Con	monthly quarterly x semiannual annual single event Try event is recommended from the June 12, 2024 investigation date to the July 22, 2024 screening date. Poly 0.0% Reduction Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A x Notes The Respondent does not meet the good faith criteria for this violation. Violation Subtota	\$3,750
	ith Efforts to Con	monthly quarterly x semiannual annual single event with single eve	\$3,750 \$3,397
	ith Efforts to Con	monthly quarterly x semiannual annual single event with semiannual single event wi	\$3,750 \$3,397

Economic Benefit Worksheet										
Respondent	BHARWANI IN	VESTMENT GROU	IP INC dba Kulsu	m's Che	evron					
Case ID No.	66434									
Reg. Ent. Reference No.										
	Petroleum Sto						Years of			
Violation No.		rage rank				Percent Interest	Depreciation			
Violation No.	7					F 0				
						5.0	15			
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount			
I tem 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				0.00	\$0	n/a	\$0			
Training/Sampling				0.00	\$0	n/a	\$0			
Remediation/Disposal				0.00	\$0	n/a	\$0			
Other (as needed)				0.00	\$0	n/a	\$0			
Other (as needed)	\$1,500	12-Jun-2024	18-May-2025	0.93	\$70	n/a	\$70			
	Estimated de	laved cost to impl	ement a release	detecti	on method for the	USTs at the Facility	including but			
Notes for DELAYED costs						STs at the Facility (\$				
Notes for BEERTED costs		· · ·				stimated date of cor				
	Date Ne	equired is the live	estigation date a	na the i	inal Date is the es	stimated date of cor	iipiiarice.			
Avoided Costs	ANNU	ALIZE avoided of	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)				0.00	\$0	\$0	\$0			
No. 1 AVOIDED										
Notes for AVOIDED costs										
	Į.									
Approx. Cost of Compliance		\$1,500			TOTAL		\$70			
Approx. Cost of Compliance		\$1,500			IUIAL	I	\$/0			

	Screening Date				O. 2024-1191-PST-E		PCW
	Respondent	BHARWANI INV	ESTMENT GRO	OUP INC dba Kulsum's	Chevron	Policy R	evision 5 (January 28, 2021)
	Case ID No.	66434				PCW	Revision February 11, 2021
Reg.	Ent. Reference No.	RN102469707					
	Media	Petroleum Stora	age Tank				
	Enf. Coordinator	Celicia Garza	_				
	Violation Number	5					
	Rule Cite(s)		20	Tex. Admin. Code §	224 72		
			30	Tex. Admin. Code 9	334.72		
		Failed to rep	ort a suspecte	d release to the TCE	2 within 24 hours of discov	very.	
					ords for the super unleade		
	Violation Description				per 2023 and January 202		
					ntory control records for that ated suspected releases th		
		tarik irom Augu	131 2025 and 5	not reported.	ited suspected releases ti	iat were	
					Base I	Penalty	\$25,000
						_	
>> Env	vironmental, Prope	rty and Hum		Matrix			
	5 .		Harm	N 41			
OR	Release	Major	Moderate	Minor			
UK	Actual				Domont 0.00/		
	Potential				Percent 0.0%		
>> Dro	grammatic Matrix						
>>FIO	Falsification	Major	Moderate	Minor			
	T dioinoution	x	moderate	· · · · · · · · · · · · · · · · · · ·	Percent 10.0%		
					10.070		
	Matrix	10	00% of the rule	e requirement was no	t met.		
	Notes						
				,	Adjustment	\$22,500	
						Ī	\$2,500
\/:ala±:	an Frants						
violati	on Events						
	Number of \	/iolation Events	2	295	Number of violation da	ivs	
						<i>J</i> -	
		daily					
		daily weekly					
		7					
		weekly			Violation Base I	Penalty	\$5,000
		weekly monthly			Violation Base I	Penalty [\$5,000
		weekly monthly quarterly			Violation Base I	Penalty [\$5,000
		weekly monthly quarterly semiannual	x		Violation Base i	Penalty	\$5,000
		weekly monthly quarterly semiannual annual	X		Violation Base ∣	Penalty	\$5,000
	Totalisada	weekly monthly quarterly semiannual annual single event		for each UCT which			\$5,000
	Two single	weekly monthly quarterly semiannual annual single event		; for each UST which	Violation Base I		\$5,000
	Two single	weekly monthly quarterly semiannual annual single event		o for each UST which			\$5,000
Good F		weekly monthly quarterly semiannual annual single event	mmended (one	ofor each UST which	a suspected release occur	red).	\$5,000 \$0
Good F	Two single	weekly monthly quarterly semiannual annual single event	mmended (one	e for each UST which	a suspected release occur		
Good F		weekly monthly quarterly semiannual annual single event	mmended (one		a suspected release occur	red).	
Good F		weekly monthly quarterly semiannual annual single event events are recor ply Extraordinary	mmended (one		a suspected release occur	red).	
Good F		weekly monthly quarterly semiannual annual single event events are recor	mmended (one		a suspected release occur	red).	
Good F		weekly monthly quarterly semiannual annual single event events are recor ply Extraordinary Ordinary	0.0% efore NOE/NOV	NOE/NOV to EDPRP/Settle	a suspected release occur Rement Offer	red).	
Good F		weekly monthly quarterly semiannual annual single event events are recor ply Extraordinary Ordinary	0.0% efore NOE/NOV	NOE/NOV to EDPRP/Settle	a suspected release occur Rement Offer a good faith criteria for	red).	
Good F		weekly monthly quarterly semiannual annual single event events are recor ply Extraordinary Ordinary N/A	0.0% efore NOE/NOV	NOE/NOV to EDPRP/Settle	a suspected release occur Rement Offer a good faith criteria for	red).	
Good F		weekly monthly quarterly semiannual annual single event events are recor ply Extraordinary Ordinary N/A	0.0% efore NOE/NOV	NOE/NOV to EDPRP/Settle	a suspected release occur Regenent Offer e good faith criteria for	eduction	\$0
Good F		weekly monthly quarterly semiannual annual single event events are recor ply Extraordinary Ordinary N/A	0.0% efore NOE/NOV	NOE/NOV to EDPRP/Settle	a suspected release occur Rement Offer a good faith criteria for	eduction	
	Faith Efforts to Com	weekly monthly quarterly semiannual annual single event events are recor ply Extraordinary Ordinary N/A Notes	0.0% efore NOE/NOV x The Responde	NOE/NOV to EDPRP/Settle	a suspected release occur Regement Offer g good faith criteria for Violation S	eduction	\$0
		weekly monthly quarterly semiannual annual single event events are recor ply Extraordinary Ordinary N/A Notes	0.0% efore NOE/NOV x The Responde	NOE/NOV to EDPRP/Settle	a suspected release occur Regenent Offer e good faith criteria for	eduction	\$0
	Faith Efforts to Com	weekly monthly quarterly semiannual annual single event events are recor ply Extraordinary Ordinary N/A Notes	0.0% efore NOE/NOV x The Responde	NOE/NOV to EDPRP/Settle	a suspected release occur Rement Offer good faith criteria for Violation S Statutory Limit 1	eduction	\$0
	Faith Efforts to Com	weekly monthly quarterly semiannual annual single event events are recor ply Extraordinary Ordinary N/A Notes	nmended (one 0.0% efore NOE/NOV x The Responde	ent does not meet the this violation.	a suspected release occur Regement Offer g good faith criteria for Violation S	red). eduction fubtotal fest ty Total	\$0

	E	conomic	Benefit '	Wor	ksheet						
Respondent	BHARWANI IN	VESTMENT GROU	P INC dba Kulsu	m's Che	evron						
Case ID No.	66434										
Reg. Ent. Reference No.	RN102469707										
	Petroleum Sto					D	Years of				
Violation No.	5	· ·				Percent Interest	Depreciation				
						5.0	15				
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount				
Item Description		Date Required	i mai Bate		microsi bavea	oosis carea	LD /imount				
rtem bescription											
Delayed Costs											
Delayed Costs		1		0.00	\$0	\$0	\$0				
Equipment Buildings				0.00	\$0 \$0	\$0 \$0	\$0 \$0				
Other (as needed)				0.00	\$0 \$0	\$0	\$0				
Engineering/Construction				0.00	\$0 \$0	\$0	\$0				
Land				0.00	\$0	n/a	\$0				
Record Keeping System				0.00	\$0	n/a	\$0				
Training/Sampling	\$100	12-Jun-2024	18-May-2025	0.93	\$5	n/a	\$5				
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		•			•	ng suspected release stimated date of con	,				
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	l 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				
Other (as needed)				0.00	\$0	\$0	\$0				
Other (as needed)	\$75	1-Oct-2023	22-Jul-2024	0.81	\$3	\$75	\$78				
Other (as needed)				0.00	\$0	\$0	\$0				
Notes for AVOIDED costs					been reported an	ent report). The Da d the Final Date is t					
Approx. Cost of Compliance		\$175			TOTAL		\$83				

	Screening Date				2024-1191-PST-E	PCW
	Respondent	BHARWANI INVE	ESTMENT GROUP	P INC dba Kulsum's	Chevron	Policy Revision 5 (January 28, 20)
	Case ID No.					PCW Revision February 11, 20
Reg.	Ent. Reference No.					
	Media	Petroleum Stora	ige Tank			
	Enf. Coordinator	-				
	Violation Number	6				
	Rule Cite(s)		30 T€	ex. Admin. Code § 3	34.74	
					eases of regulated substant	
					334.72 (relating to Reportin ailing monthly inventory co	
	Violation Description				t 2023 and September 2023	
			•	-	24 and May 2024 and failing	
		monthly inv	entory control re	ecords for the diesel	tank from August 2023 and	d
		September	2023 indicated	suspected releases	that were not investigated.	
	'					
					Base Per	nalty \$25,0
Г	duammantal Duama	atre son al liberar	on Haalth M	- t ui		
>> En\	vironmental, Proper	ty and Huma	an Health IVI Harm	atrix		
	Release	Major	Moderate	Minor		
OR	Actual					
	Potential	Х			Percent 15.0%	
	· ·					
>>Pro	grammatic Matrix					
	Falsification	Major	Moderate	Minor		
					Percent 0.0%	
	Matrix Human healtl	h or the environr	nent will or could	be exposed to poll	utants that would exceed le	evels
				•	s as a result of the violation	
				۸	djustment \$2°	1,250
				A	ujustinent \$2	1,230
						\$3,7
Violatio	on Events					
	Number of V	/iolation Events	3	266	Number of violation days	
	Number of v	Tolation Events	3	200	Number of violation days	•
		daily				
		weekly				
		monthly				
		quarterly	х		Violation Base Per	nalty \$11,2
		semiannual				-
		annual				
		single event				
	Three quarte	erly events are re	ecommended fro	m the earliest suspe	ected release investigation of	due
	·	date of Octo	ber 30, 2023 to	the July 22, 2024 so	creening date.	
	sith Efforts to Com	nly	0.0%		Redu	uction
Good F	aith Efforts to Com			E (NOV.) EDDDD (C. III		
Good F	aith Efforts to Com		efore NOE/NOV NO	E/NOV to EDPRP/Settlen	nent Offer	
Good F	aith Efforts to Com		efore NOE/NOV NO	E/NOV to EDPRP/Settler.	nent Offer	
Good F	aith Efforts to Com	Ве	efore NOE/NOV NO	E/NOV to EDPRP/Settler	nent Offer	
Good F	alin Efforts to Com	Be Extraordinary	X	E/NOV to EDPRP/Settler	ment Offer	
Good F	alin Efforts to Com	Extraordinary Ordinary N/A	X			
Good F	alin Efforts to Com	Extraordinary Ordinary N/A	X	does not meet the	good faith criteria for	
Good F	alin Efforts to Com	Extraordinary Ordinary N/A	X			
Good F	alin Efforts to Com	Extraordinary Ordinary N/A	X	does not meet the	good faith criteria for	
Good F	alin Efforts to Com	Extraordinary Ordinary N/A	X	does not meet the		ototal \$11,2
		Extraordinary Ordinary N/A Notes	x The Respondent	does not meet the	good faith criteria for Violation Sub	
	mic Benefit (EB) for	Extraordinary Ordinary N/A Notes	x The Respondent	does not meet the this violation.	good faith criteria for	
	mic Benefit (EB) for	Extraordinary Ordinary N/A Notes	x The Respondent	does not meet the	good faith criteria for Violation Sub	st
	mic Benefit (EB) for	Extraordinary Ordinary N/A Notes	x The Respondent	does not meet the this violation.	good faith criteria for Violation Sub Statutory Limit Tes	St Total \$10,1

Economic Benefit Worksheet								
Respondent	Respondent BHARWANI INVESTMENT GROUP INC dba Kulsum's Chevron							
Case ID No.	Case ID No. 66434							
Reg. Ent. Reference No.		1						
							Years of	
Media Petroleum Storage Tank Violation No. 6 Years o Depreciat								
						5.0	15	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount	
Item 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				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		18-May-2025		\$109	n/a	\$109	
						and \$600 for the		
Notes for DELAYED costs					•	ases and implement		
Notes for BEEATED costs	corrective m					se investigation due	date and the	
		F	inal Date is the	estimat	ed date of complia	nce.		
Avoided Costs	ANNU	ALIZE avoided of	osts before er	tering	item (except for	one-time avoided	l 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								
Notes for Avoided costs								
[']								
Approx. Cost of Compliance		\$1,400			TOTAL		\$109	
,, , , , , , , , , , , , ,		4.7100					¥.57	

		ening Date			Doci	cet No. 2024-1191-PST-E		PCW
	R	espondent	BHARWANI IN	VESTMENT GR	OUP INC dba K	ulsum's Chevron	Policy R	Revision 5 (January 28, 2021)
	С	ase ID No.	66434				PCV	V Revision February 11, 2021
Reg.	Ent. Ref	erence No.	RN102469707					
		Media	Petroleum Stor	age Tank				
	Enf. C	oordinator	Celicia Garza	_				
	Viola	tion Number	7					,
		Rule Cite(s)	30 Tex. Adm	in. Code § 334	4.48(h)(1)(A)(ii)	and Tex. Water Code § 26.3	475(c)(1)	
			Failed to condu	ist the walkth	rough increation	ns of the UST system's releas	a dataction	
	Violation	n Description	i alleu to coriut			ice every 30 days.	e detection	
				oquip.	TOTAL OLD TOUR	ico every ee daye.		
								ı
						Ва	se Penalty	\$25,000
-	•							
>> En\	/ironmei	ntal, Propei	rty and Hun		Matrix			
		Release	Major	Harm Moderate	Minor			
OR		Actual		Moderate	14111131			
		Potential		Х		Percent 5.0%		
							_	
>>Pro	gramma	tic Matrix						
		Falsification	Major	Moderate	Minor		_	
						Percent 0.0%	,	
								1
	Motrix	Human health	or the environment	ment will or co	ould be exposed	to significant amounts of pol	lutants that	
	Matrix Notes	would not exce	eed levels that	are protective	of human healt	h or environmental receptors	as a result	
	Notes			0	f the violation.			
						Adjustment	\$23,750	
							,	\$1,250
								\$1,230
Violatio	on Event	S						
Violatio	on Event	s			_			
Violatio	on Event		/iolation Events	1		40 Number of violation	n days	
Violatio	on Event			1		40 Number of violation	n days	
Violatio	on Event		daily	1		40 Number of violation	n days	
Violatio	on Event		daily weekly	1		40 Number of violation	n days	
Violatio	on Event		daily weekly monthly					01.050
Violatio	on Event		daily weekly monthly quarterly	1 x		Number of violation Violation Ba		\$1,250
Violatio	on Event		daily weekly monthly quarterly semiannual					\$1,250
Violatio	on Event		daily weekly monthly quarterly semiannual annual					\$1,250
Violatio	on Event		daily weekly monthly quarterly semiannual					\$1,250
Violatio	on Event	Number of \	daily weekly monthly quarterly semiannual annual single event	X		Violation Ba	se Penalty	\$1,250
Violation	on Event	Number of \	daily weekly monthly quarterly semiannual annual single event	x mmended froi		Violation Ba	se Penalty	\$1,250
Violation	on Event	Number of \	daily weekly monthly quarterly semiannual annual single event	x mmended froi	m the June 12, 4 screening date	Violation Ba	se Penalty	\$1,250
		Number of N	daily weekly monthly quarterly semiannual annual single event	x mmended from 202-	4 screening date	Violation Ba	se Penalty	
		Number of \	daily weekly monthly quarterly semiannual annual single event	x x mmended from 202-	4 screening date	Violation Ba 2024 investigation date to the	se Penalty	\$1,250 \$0
		Number of N	daily weekly monthly quarterly semiannual annual single event	x x 202-	4 screening date	Violation Ba	se Penalty	
		Number of N	daily weekly monthly quarterly semiannual annual single event ly event is reco ply Extraordinary	x x 202-	4 screening date	Violation Ba 2024 investigation date to the	se Penalty	
		Number of N	daily weekly monthly quarterly semiannual annual single event ly event is reco ply Extraordinary Ordinary	x mmended from 2024 0.0% Before NOE/NOV	4 screening date	Violation Ba 2024 investigation date to the	se Penalty	
		Number of N	daily weekly monthly quarterly semiannual annual single event ly event is reco ply Extraordinary	x mmended from 2024 0.0% Before NOE/NOV	4 screening date	Violation Ba 2024 investigation date to the	se Penalty	
		Number of N	daily weekly monthly quarterly semiannual annual single event ly event is reco ply Extraordinary Ordinary N/A	x mmended froi 202- 0.0% sefore NOE/NOV	A screening date	Violation Ba 2024 investigation date to the	se Penalty	
		Number of N	daily weekly monthly quarterly semiannual annual single event ly event is reco ply Extraordinary Ordinary	x mmended froi 202- 0.0% sefore NOE/NOV	NOE/NOV to EDPI	Violation Ba 2024 investigation date to the expression of the exp	se Penalty	
		Number of N	daily weekly monthly quarterly semiannual annual single event ly event is reco ply Extraordinary Ordinary N/A	x mmended froi 202- 0.0% sefore NOE/NOV	NOE/NOV to EDPI	Violation Ba 2024 investigation date to the RP/Settlement Offer eet the good faith criteria for	se Penalty	
		Number of N	daily weekly monthly quarterly semiannual annual single event ly event is reco ply Extraordinary Ordinary N/A	x mmended froi 202- 0.0% sefore NOE/NOV	NOE/NOV to EDPI	Violation Ba 2024 investigation date to the RP/Settlement Offer eet the good faith criteria for plation.	e July 22, Reduction	\$0
		Number of N	daily weekly monthly quarterly semiannual annual single event ly event is reco ply Extraordinary Ordinary N/A	x mmended froi 202- 0.0% sefore NOE/NOV	NOE/NOV to EDPI	Violation Ba 2024 investigation date to the RP/Settlement Offer eet the good faith criteria for plation.	se Penalty	
Good F	aith Effo	One quarter	daily weekly monthly quarterly semiannual annual single event ly event is reco ply Extraordinary Ordinary N/A	x mmended from 2024 0.0% sefore NOE/NOV x The Respond	NOE/NOV to EDPI	Violation Ba 2024 investigation date to the RP/Settlement Offer eet the good faith criteria for plation.	e July 22, Reduction	\$0
Good F	aith Effo	One quarter	daily weekly monthly quarterly semiannual annual single event y event is reco ply Extraordinary Ordinary N/A Notes	mmended from 2024 0.0% Sefore NOE/NOV X The Respond	NOE/NOV to EDPF	Violation Ba 2024 investigation date to the RP/Settlement Offer eet the good faith criteria for plation. Violatio Statutory Liminary	Reduction n Subtotal	\$1,250
Good F	aith Effo	One quarter	daily weekly monthly quarterly semiannual annual single event y event is reco ply Extraordinary Ordinary N/A Notes	mmended from 2024 0.0% Sefore NOE/NOV X The Respond	NOE/NOV to EDPI	Violation Ba 2024 investigation date to the second	Reduction n Subtotal	\$0
Good F	aith Effo	One quarter	daily weekly monthly quarterly semiannual annual single event y event is reco ply Extraordinary Ordinary N/A Notes	x mmended from 202-202-202-202-202-202-202-202-202-202	NOE/NOV to EDPR	Violation Ba 2024 investigation date to the RP/Settlement Offer eet the good faith criteria for plation. Violatio Statutory Liminary	Reduction Subtotal it Test malty Total	\$1,250

Economic Benefit Worksheet								
Respondent BHARWANI INVESTMENT GROUP INC dba Kulsum's Chevron								
Case ID No.	Case ID No. 66434							
Reg. Ent. Reference No.	RN102469707							
Media	Madia Patralaum Staraga Tank							
Violation No.	iolation No. 7							
						5.0	15	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount	
Item Description		•						
Trem 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				0.00	\$0	n/a	\$0	
Training/Sampling				0.00	\$0	n/a	\$0	
Remediation/Disposal				0.00	\$0	n/a	\$0	
Permit Costs	*100	10 1 0001	10.11 0005	0.00	\$0	n/a	\$0	
Other (as needed)	\$100	12-Jun-2024	18-May-2025	0.93	\$5	n/a	\$5	
Notes for DELAYED costs						ections of the releas I Date is the estima		
Notes for DELATED Costs	equipmen	it. The Date Requ		complia		Date is the estima	ted date of	
Avoided Costs	ANNU	ALIZE avoided of	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				0.00	\$0	\$0	\$0	
Financial Assurance	*100	10 1 0001	00 1 1 000 1	0.00	\$0	\$0	\$0	
ONE-TIME avoided costs	\$100	12-Jun-2024	22-Jul-2024	0.11	\$1	\$100	\$101	
Other (as needed)				0.00	\$0	\$0	\$0	
	Estimated	avoided cost to h	eain conductina	30-day	walkthrough inspe	ections of the releas	e detection	
Notes for AVOIDED costs			3	,	J 1	al Date is the scree		
	- 4			9			9 =====	
<u> </u>								
Approx. Cost of Compliance		\$200			TOTAL		\$106	
T. P. C. Cost of Compilation		Ψ200			IOTAL		Ψ100	

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



Compliance History Report

Compliance History Report for CN602973489, RN102469707, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Customer, Respondent, CN602973489, BHARWANI Classification: HIGH Rating: 0.00 or Owner/Operator: INVESTMENT GROUP INC

Regulated Entity: RN102469707, Kulsum's Chevron Classification: HIGH Rating: 0.00

Complexity Points: 6 Repeat Violator: NO

CH Group: 14 - Other

Location: 2525 North Josey Lane, in Carrollton, Dallas County, Texas

TCEQ Region: REGION 04 - DFW METROPLEX

ID Number(s):

PETROLEUM STORAGE TANK REGISTRATION LEAKING PETROLEUM STORAGE TANKS

REGISTRATION 17756 REMEDIATION ID NUMBER 116901

Compliance History Period: September 01, 2019 to August 31, 2024 Rating Year: 2024 Rating Date: 09/01/2024

Date Compliance History Report Prepared: December 18, 2024

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: December 18, 2019 to December 18, 2024

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

Name: Celicia A. Garza Phone: (210) 657-8422

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 29, 2021 (1765851)

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

н.	Voluntary on-site compliance assessment dates: N/A
I.	Participation in a voluntary pollution reduction program: $\ensuremath{\text{N/A}}$
J.	Early compliance: N/A
	es Outside of Texas: N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	TEXAS COMMISSION ON
BHARWANI INVESTMENT GROUP INC	§	TEAAS COMMISSION ON
DBA KULSUM'S CHEVRON	§	
RN102469707	§	ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2024-1191-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 BHARW	ANI INVESTMENT GROUP INC dba Kulsum's Chevron (the
"Respondent") under the	authority of Tex. Water Code chs. 7 and 26. The Executive Director of
the TCEQ, through the Er	forcement 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 2525 North Josey Lane in Carrollton, 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 \$27,554 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$624 of the penalty and \$5,510 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 \$21,420 of the undeferred penalty shall be paid in 35 monthly payments of \$612 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 on June 13, 2024, the Respondent submitted a properly completed UST registration and self-certification form for the Facility and obtained a valid, current TCEQ delivery certificate.

II. ALLEGATIONS

During an investigation at the Facility conducted on June 12, 2024, an investigator documented that the Respondent:

- 1. 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 previous delivery certificate expired on July 31, 2023.
- 2. Failed to make available to a common carrier a valid, current TCEQ delivery certificate before accepting delivery of a regulated substance into the USTs, in violation of 30 Tex. ADMIN. CODE § 334.8(c)(5)(A)(i) and Tex. WATER CODE § 26.3467(a). Specifically, the Respondent accepted approximately 76 unauthorized fuel deliveries from August 2023 to May 2024 without a valid, current TCEQ delivery certificate.
- 3. Failed to provide corrosion protection to all underground and/or totally or partially submerged metal components of any existing UST system which are designed or used to convey, contain, or store regulated substances, in violation of 30 Tex. Admin. Code § 334.49(a)(4) and Tex. Water Code § 26.3475(d). Specifically, the metal components located inside the submersible turbine pump ("STP") containment sumps for dispensers

- 1/2, 5/6, and 7/8 were in direct contact with water and did not have corrosion protection installed.
- 4. Failed to monitor the USTs in a manner which will detect a release at a frequency of at least once every 30 days, in violation of 30 Tex. ADMIN. CODE § 334.50(b)(1)(A) and Tex. WATER CODE § 26.3475(c)(1).
- 5. Failed to conduct effective inventory control procedures for all USTs at the Facility, in violation of 30 Tex. Admin. Code § 334.48(c) and Tex. Water Code § 26.3475(c)(1). Specifically, the Respondent incorrectly recorded fuel deliveries in their inventory control records as net volumes when they should have been recorded as gross volumes.
- 6. Failed to report a suspected release to the TCEQ within 24 hours of discovery, in violation of 30 Tex. ADMIN. CODE § 334.72. Specifically, failing monthly inventory control records for the super unleaded tank from August 2023 and September 2023, December 2023 and January 2024, and April 2024, and May 2024 and failing monthly inventory control records for the diesel tank from August 2023 and September 2023 indicated suspected releases that were not reported.
- 7. 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, failing monthly inventory control records for the super unleaded tank from August 2023 and September 2023, December 2023 and January 2024, and April 2024, and May 2024 and failing monthly inventory control records for the diesel tank from August 2023 and September 2023 indicated suspected releases that were not investigated.
- 8. Failed to conduct the walkthrough inspections of the UST system's release detection equipment at least once every 30 days, in violation of 30 Tex. ADMIN. CODE § 334.48(h)(1)(A)(ii) and Tex. Water Code § 26.3475(c)(1).

III. DENIALS

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

IV. ORDERING PROVISIONS

NOW. THEREFORE. THE TEXAS COMMISSION ON ENVIRONMENTAL OUALITY 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: BHARWANI INVESTMENT GROUP INC dba Kulsum's Chevron. Docket No. 2024-1191-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. Within 30 days after the effective date of this Order:
 - Install and test a corrosion protection system for the metal components located inside the STP containment sumps, in accordance with 30 Tex. ADMIN. CODE § 334.49;
 - ii. Implement a release detection method for the USTs at the Facility, including but not limited to conducting proper inventory control procedures for all USTs at the Facility, in accordance with 30 Tex. ADMIN. CODE §§ 334.48 and 334.50;
 - iii. Develop and implement a process for reporting suspected releases timely, in accordance with 30 Tex. ADMIN. CODE § 334.72;
 - iv. Conduct investigations of the suspected releases and implement appropriate corrective measures, in accordance with 30 Tex. Admin. Code § 334.74; and
 - v. Begin conducting 30-day walkthrough inspections of the release detection equipment, in accordance with 30 Tex. ADMIN. CODE § 334.48.
 - b. Within 45 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a. The certification shall be signed by the Respondent and shall include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

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

with a copy to:

Waste Section Manager Dallas/Fort Worth Regional Office Texas Commission on Environmental Quality 2309 Gravel Drive Fort Worth, Texas 76118-6951

- 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 Facility operations referenced in this Order.
- 5. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by 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 Enforcement Division at the address listed above.
- 6. 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.
- 7. 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.
- 8. 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.

BHARWANI INVESTMENT GROUP INC dba Kulsum's Chevron DOCKET NO. 2024-1191-PST-E Page 6

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	Date
Thiote Millo-Jurach For the Executive Director	10/11/2025
For the Executive Director	Date
I, the undersigned, have read and understand the attact the attached Order, and I do agree to the terms and con acknowledge that the TCEQ, in accepting payment for to such representation.	nditions specified therein. I further
I also understand that failure to comply with the Order and/or failure to timely pay the penalty amount, may r	ring Provisions, if any, in this Order result in:
 A negative impact on compliance history; Greater scrutiny of any permit applications subm Referral of this case to the OAG for contempt, inj and/or attorney fees, or to a collection agency; Increased penalties in any future enforcement acc Automatic referral to the OAG of any future enfo TCEQ seeking other relief as authorized by law. 	junctive relief, additional penalties, tions;
In addition, any falsification of any compliance docum	ents may result in criminal prosecution.
Signature	9.25.2025. Date
Name (Printed or typed) Authorized Representative of BHARWANI INVESTMENT GROUP INC dba Kulsum's Ch	Title

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