

**Executive Summary – Enforcement Matter – Case No. 67148**  
**Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card Lock 8620**  
**RN101432185**  
**Docket No. 2025-0012-PST-E**

**Order Type:**

1660 Agreed Order

**Findings Order Justification:**

N/A

**Media:**

PST

**Small Business:**

No

**Location(s) Where Violation(s) Occurred:**

Pilot Thomas Logistics Card Lock 8620, 3013 Garden City Highway, Midland, Midland County

**Type of Operation:**

Underground storage tank ("UST") system and 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:** \$16,276

**Amount Deferred for Expedited Settlement:** \$3,255

**Total Paid to General Revenue:** \$13,021

**Total Due to General Revenue:** \$0

Payment Plan: N/A

**Compliance History Classifications:**

Person/CN - Satisfactory

Site/RN - High

**Major Source:** No

**Statutory Limit Adjustment:** N/A

**Applicable Penalty Policy:** January 2021

***Investigation Information***

**Complaint Date(s):** N/A

**Complaint Information:** N/A

**Date(s) of Investigation:** November 5, 2024

**Date(s) of NOE(s):** December 12, 2024

**Executive Summary – Enforcement Matter – Case No. 67148  
Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card Lock 8620  
RN101432185  
Docket No. 2025-0012-PST-E**

***Violation Information***

1. Failed to report a suspected release to the TCEQ within 24 hours of discovery. Specifically, monthly inventory control ("MIC") records for the manifold UST Nos. 1 and 2 and the manifold UST Nos. 3 and 4 failed from February 2024 to May 2024, indicating suspected releases that were not reported [30 TEX. ADMIN. CODE § 334.72].
2. Failed to investigate and confirm all suspected releases of regulated substances within 30 days. Specifically, MIC records for the manifold UST Nos. 1 and 2 and the manifold UST Nos. 3 and 4 failed from February 2024 to May 2024, indicating suspected releases that were not investigated [30 TEX. ADMIN. CODE § 334.74].

***Corrective Actions/Technical Requirements***

**Corrective Action(s) Completed:**

N/A

**Technical Requirements:**

The Order will require the Respondent to:

- a. Within 30 days:
  - i. Develop and implement a process for reporting suspected releases timely; and
  - ii. Conduct an investigation of the suspected releases and implement appropriate corrective measures.
- 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 5, MC R-13, (210) 657-8422; Michael Parrish, Enforcement Division, MC R-12, (512) 239-2548

**Respondent:** Dennis J. Cassidy Jr., President, Pilot Thomas Logistics LLC, P.O. Box 2136, Grapevine, Texas 76099  
Joey Huerta, Cardlock Operations Manager, Pilot Thomas Logistics LLC, P.O. Box 2136, Grapevine, Texas 76099

**Respondent's Attorney:** N/A



# Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

<b>DATES</b>	<b>Assigned</b>	16-Dec-2024	<b>Screening</b>	18-Dec-2024	<b>EPA Due</b>	
	<b>PCW</b>	2-Jan-2025				

## RESPONDENT/FACILITY INFORMATION

<b>Respondent</b>	Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card Lock 8620				
<b>Reg. Ent. Ref. No.</b>	RN101432185				
<b>Facility/Site Region</b>	7-Midland	<b>Major/Minor Source</b>	Minor		

## CASE INFORMATION

<b>Enf./Case ID No.</b>	67148	<b>No. of Violations</b>	2
<b>Docket No.</b>	2025-0012-PST-E	<b>Order Type</b>	1660
<b>Media Program(s)</b>	Petroleum Storage Tank	<b>Government/Non-Profit</b>	No
<b>Multi-Media</b>		<b>Enf. Coordinator</b>	Faye Renfro
		<b>EC's Team</b>	Enforcement Team 3
<b>Admin. Penalty \$ Limit Minimum</b>	\$0	<b>Maximum</b>	\$25,000

## Penalty Calculation Section

<b>TOTAL BASE PENALTY (Sum of violation base penalties)</b>	<b>Subtotal 1</b>	\$16,250
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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.

<b>Compliance History</b>	0.0%	<b>Adjustment</b>	<b>Subtotals 2, 3, &amp; 7</b>	\$0
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<b>Notes</b>	No adjustment for Compliance History.
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<b>Culpability</b>	No	0.0%	<b>Enhancement</b>	<b>Subtotal 4</b>	\$0
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<b>Notes</b>	The Respondent does not meet the culpability criteria.
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<b>Good Faith Effort to Comply Total Adjustments</b>	<b>Subtotal 5</b>	\$0
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<b>Economic Benefit</b>	0.0%	<b>Enhancement*</b>	<b>Subtotal 6</b>	\$0
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Total EB Amounts	\$135	*Capped at the Total EB \$ Amount
Estimated Cost of Compliance	\$1,525	

<b>SUM OF SUBTOTALS 1-7</b>	<b>Final Subtotal</b>	\$16,250
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<b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b>	0.2%	<b>Adjustment</b>	\$26
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Reduces or enhances the Final Subtotal by the indicated percentage.

<b>Notes</b>	Enhancement to capture the avoided cost of compliance associated with Violation No. 1.
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<b>Final Penalty Amount</b>	\$16,276
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<b>STATUTORY LIMIT ADJUSTMENT</b>	<b>Final Assessed Penalty</b>	\$16,276
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<b>DEFERRAL</b>	20.0%	<b>Reduction</b>	<b>Adjustment</b>	-\$3,255
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Reduces the Final Assessed Penalty by the indicated percentage.

<b>Notes</b>	Deferral offered for expedited settlement.
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<b>PAYABLE PENALTY</b>	\$13,021
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<b>Screening Date</b>	18-Dec-2024	<b>Docket No.</b>	2025-0012-PST-E	<b>PCW</b>
<b>Respondent</b>	Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card Lock 8620			Policy Revision 5 (January 28, 2021)
<b>Case ID No.</b>	67148			PCW Revision February 11, 2021
<b>Reg. Ent. Reference No.</b>	RN101432185			
<b>Media</b>	Petroleum Storage Tank			
<b>Enf. Coordinator</b>	Faye Renfro			

### 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)

Satisfactory Performer

**Adjustment Percentage (Subtotal 7)** 0%

#### >> Compliance History Summary

**Compliance History Notes**

No adjustment for Compliance History.

**Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)** 0%

#### >> Final Compliance History Adjustment

**Final Adjustment Percentage \*capped at 100%** 0%

<b>Screening Date</b>	18-Dec-2024	<b>Docket No.</b>	2025-0012-PST-E	<b>PCW</b>
<b>Respondent</b>	Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card Lock 8620			Policy Revision 5 (January 28, 2021)
<b>Case ID No.</b>	67148			PCW Revision February 11, 2021
<b>Reg. Ent. Reference No.</b>	RN101432185			
<b>Media</b>	Petroleum Storage Tank			
<b>Enf. Coordinator</b>	Faye Renfro			
<b>Violation Number</b>	1			
<b>Rule Cite(s)</b>	30 Tex. Admin. Code § 334.72			
<b>Violation Description</b>	Failed to report a suspected release to the TCEQ within 24 hours of discovery. Specifically, monthly inventory control ("MIC") records for the manifold UST Nos. 1 and 2 and the manifold UST Nos. 3 and 4 failed from February 2024 to May 2024, indicating suspected releases that were not reported.			
	<b>Base Penalty</b>	\$25,000		
>> Environmental, Property and Human Health Matrix				
OR	<b>Release</b>	<b>Harm</b>		
		Major	Moderate	Minor
	Actual			
	Potential			
				<b>Percent</b> 0.0%
>>Programmatic Matrix				
	Falsification	Major	Moderate	Minor
		x		
				<b>Percent</b> 10.0%
<b>Matrix Notes</b>	100% of the rule requirement was not met.			
	<b>Adjustment</b>	\$22,500		
		\$2,500		
>> Violation Events				
	Number of Violation Events	2	271	Number of violation days
	daily			
	weekly			
	monthly			
	quarterly			
	semiannual			
	annual			
	single event	x		
	<b>Violation Base Penalty</b>	\$5,000		
	Two single events are recommended (one for each set of manifolded USTs with a suspected release).			
>> Good Faith Efforts to Comply				
		0.0%	Reduction	\$0
		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
	Extraordinary			
	Ordinary			
	N/A	x		
	<b>Notes</b>	The Respondent does not meet the good faith criteria for this violation.		
	<b>Violation Subtotal</b>	\$5,000		
>> Economic Benefit (EB) for this violation				
	<b>Statutory Limit Test</b>			
	<b>Estimated EB Amount</b>	\$31	<b>Violation Final Penalty Total</b>	\$5,008
	<b>This violation Final Assessed Penalty (adjusted for limits)</b>			\$5,008

# Economic Benefit Worksheet

**Respondent** Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card Lock 8620  
**Case ID No.** 67148  
**Reg. Ent. Reference No.** RN101432185  
**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)	\$100	5-Nov-2024	12-Oct-2025	0.93	\$5	n/a	\$5

### Notes for DELAYED costs

Estimated delayed cost to develop and implement a process for reporting suspected releases timely. The Date Required is the investigation date and the Final Date is the estimated date of compliance.

## Avoided Costs

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

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs	\$25	22-Mar-2024	18-Dec-2024	0.74	\$1	\$25	\$26
Other (as needed)				0.00	\$0	\$0	\$0

### Notes for AVOIDED costs

Estimated avoided cost to report the suspected releases. The Date Required is the earliest date the suspected releases should have been reported and the Final Date is the screening date.

### Approx. Cost of Compliance

\$125

### TOTAL

\$31

<b>Screening Date</b>	18-Dec-2024	<b>Docket No.</b>	2025-0012-PST-E	<b>PCW</b>
<b>Respondent</b>	Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card Lock 8620			Policy Revision 5 (January 28, 2021)
<b>Case ID No.</b>	67148			PCW Revision February 11, 2021
<b>Reg. Ent. Reference No.</b>	RN101432185			
<b>Media</b>	Petroleum Storage Tank			
<b>Enf. Coordinator</b>	Faye Renfro			
<b>Violation Number</b>	2			
<b>Rule Cite(s)</b>	30 Tex. Admin. Code § 334.74			
<b>Violation Description</b>	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, MIC records for the manifold UST Nos. 1 and 2 and the manifold UST Nos. 3 and 4 failed from February 2024 to May 2024, indicating suspected releases that were not investigated.			
	<b>Base Penalty</b>	\$25,000		
>> Environmental, Property and Human Health Matrix				
OR	<b>Release</b>	<b>Harm</b>		
		Major	Moderate	Minor
	Actual			
	Potential	x		
				<b>Percent</b> 15.0%
>> Programmatic Matrix				
	Falsification	Major	Moderate	Minor
				<b>Percent</b> 0.0%
<b>Matrix Notes</b>	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.			
	<b>Adjustment</b>	\$21,250		
		\$3,750		
Violation Events				
	Number of Violation Events	3	242	Number of violation days
		daily		
		weekly		
		monthly		
		quarterly	x	
		semiannual		
		annual		
		single event		
				<b>Violation Base Penalty</b> \$11,250
	Three quarterly events are recommended from the earliest suspected release investigation due date of April 20, 2024 to the December 18, 2024 screening date.			
Good Faith Efforts to Comply				
		0.0%	Reduction	\$0
		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
	Extraordinary			
	Ordinary			
	N/A	x		
	Notes	The Respondent does not meet the good faith criteria for this violation.		
	<b>Violation Subtotal</b>	\$11,250		
Economic Benefit (EB) for this violation				
	<b>Statutory Limit Test</b>			
	<b>Estimated EB Amount</b>	\$104	<b>Violation Final Penalty Total</b>	\$11,268
	<b>This violation Final Assessed Penalty (adjusted for limits)</b>			\$11,268

# Economic Benefit Worksheet

**Respondent** Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card Lock 8620  
**Case ID No.** 67148  
**Reg. Ent. Reference No.** RN101432185  
**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
<b>Delayed Costs</b>							
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	20-Apr-2024	12-Oct-2025	1.48	\$104	n/a	\$104
Notes for DELAYED costs	Estimated delayed cost to conduct an investigation of the suspected releases and implement appropriate corrective measures [\$800 for tank and line tightness testing (\$400 per set of manifolded USTs) and \$600 for the Release Determination Report]. The Date Required is the earliest suspected release investigation due date and the Final Date is the estimated date of compliance.						
<b>Avoided Costs</b>							
<b>ANNUALIZE avoided costs before entering item (except for one-time avoided costs)</b>							
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			<b>TOTAL</b>		\$104	



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# Compliance History Report

Compliance History Report for CN604019786, RN101432185, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

**Customer, Respondent, or Owner/Operator:** CN604019786, Pilot Thomas Logistics LLC  
**Classification:** SATISFACTORY  
**Rating:** 4.92

**Regulated Entity:** RN101432185, Pilot Thomas Logistics Card Lock 8620  
**Classification:** HIGH  
**Rating:** 0.00

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

**CH Group:** 01 - Gas Stations with convenience Stores and other Gas Stations

**Location:** 3013 Garden City Highway, Midland, Midland County, Texas 79701-1560

**TCEQ Region:** REGION 07 - MIDLAND

**ID Number(s):**  
**PETROLEUM STORAGE TANK REGISTRATION**  
REGISTRATION 66171

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

**Date Compliance History Report Prepared:** April 15, 2025

**Agency Decision Requiring Compliance History:** Enforcement

**Component Period Selected:** April 15, 2020 to April 15, 2025

**TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.**  
**Name:** Faye Renfro  
**Phone:** (512) 239-1833

## Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

## Components (Multimedia) for the Site Are Listed in Sections A - J

### **A. Final Orders, court judgments, and consent decrees:**

N/A

### **B. Criminal convictions:**

N/A

### **C. Chronic excessive emissions events:**

N/A

### **D. The approval dates of investigations (CCEDS Inv. Track. No.):**

Item 1 January 10, 2022 (1781748)

### **E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):**

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

N/A

### **F. Environmental audits:**

N/A

### **G. Type of environmental management systems (EMSs):**

N/A

### **H. Voluntary on-site compliance assessment dates:**

N/A

**I. Participation in a voluntary pollution reduction program:**

N/A

**J. Early compliance:**

N/A

**Sites Outside of Texas:**

N/A

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN  
ENFORCEMENT ACTION  
CONCERNING

PILOT THOMAS LOGISTICS LLC DBA  
PILOT THOMAS LOGISTICS CARD  
LOCK 8620  
RN101432185

§  
§  
§  
§  
§  
§

BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

## AGREED ORDER DOCKET NO. 2025-0012-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 Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card Lock 8620 (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 convenience store with retail sales of gasoline located at 3013 Garden City Highway in Midland, Midland 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 \$16,276 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$13,021 of the penalty and \$3,255 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, 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.

## **II. ALLEGATIONS**

During an investigation at the Facility conducted on November 5, 2024, an investigator documented that the Respondent:

1. Failed to report a suspected release to the TCEQ within 24 hours of discovery, in violation of 30 TEX. ADMIN. CODE § 334.72. Specifically, monthly inventory control ("MIC") records for the manifold UST Nos. 1 and 2 and the manifold UST Nos. 3 and 4 failed from February 2024 to May 2024, indicating suspected releases that were not reported.
2. 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, MIC records for the manifold UST Nos. 1 and 2 and the manifold UST Nos. 3 and 4 failed from February 2024 to May 2024, indicating suspected releases that were not investigated.

## **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: Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card Lock 8620, Docket No. 2025-0012-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:
    - i. Develop and implement a process for reporting suspected releases timely, in accordance with 30 TEX. ADMIN. CODE § 334.72; and
    - ii. Conduct an investigation of the suspected releases and implement appropriate corrective measures, in accordance with 30 TEX. ADMIN. CODE § 334.74.
  - b. Within 45 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a. The certification shall be signed by the Respondent and shall include the following certification language:

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

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

Waste Section Manager  
Midland Regional Office  
Texas Commission on Environmental Quality  
10 Desta Drive, Suite 350E  
Midland, Texas 79705
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.

Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card Lock 8620  
DOCKET NO. 2025-0012-PST-E  
Page 5

**SIGNATURE PAGE**

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

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For the Commission

*Krista Mello-Jurack*

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For the Executive Director

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Date

09/07/2025

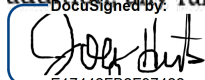
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Date

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.

Docusigned by:  
  
E17442FB2F97422...

6/18/2025

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Signature

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Date

Joey Huerta

Cardlock Operations Manager

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Name (Printed or typed)

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Title

Authorized Representative of

Pilot Thomas Logistics LLC dba Pilot Thomas Logistics Card Lock 8620

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

PO Box 2136  
Grapevine, Texas  
76099

**Instructions:** Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.