



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

May 31, 2024

Million Air
Attn: Shane Hickman, General Manager
4002 Cirrus Drive
Medford, OR 97504

RE: UST Compliance Determination
DEQ UST #5229
Freeman Holdings Oregon LLC

Attention Shan Hickman,

The Oregon Department of Environmental Quality (DEQ) finalized the underground storage tank (UST) full compliance inspection that was conducted at the facility listed above on May 14, 2024. The purpose of this letter is to inform you of the results of this inspection. Based on the records available and site conditions, the DEQ inspector did not observe any violations with applicable State of Oregon UST rules on this day.

During an inspection, DEQ attempts to conduct a thorough review of the UST system. Nonetheless, you, as the permittee and owner, remain responsible for complying with all applicable UST rules. Therefore, if a violation is observed during a subsequent inspection, the facility will be cited for this violation and may be subject to civil penalties.

The DEQ appreciates your efforts to operate and maintain your UST system in compliance with Oregon environmental law. This facility is subject to future inspections. Please remember to conduct service and maintenance inspections and periodic testing at the required intervals and to implement and/or maintain adequate record keeping. Some general recommendations for maintaining UST compliance are listed below.

- **Notify the DEQ any leak test results indicating the possibility of a release (i.e., test failure) within 24 hours as a suspected release (OAR 340-150-0500) and immediately begin investigation under OAR 340-150-0510.**
- Maintain financial responsibility coverage for pollution liability.
- Inspect and maintain impressed current corrosion control system at 60-day intervals. Maintain inspection log.
- Schedule and complete UST system corrosion protection testing on the required 3-year schedule, if necessary.
- Contact your service provider for assistance with testing and alarm investigation.
- Report a confirmed release to the DEQ within 24 hours of confirming product loss into the subsurface in any amount.

- Best practice recommendation: schedule inspection of interior of lined USTs. The Jet A tanks were lined in 2010 and should have been inspected in 2020. Inspections should be performed on 5-year intervals after the first ten years.

Please contact me if you have any questions about this matter at the DEQ Northwest office at 503-360-4287 or dave.pardue@deq.oregon.gov.

Dave Pardue

Dave Pardue
UST Program Inspector
UST Program Coordinator



Ascot Specialty Insurance Company
55 West 46th Street 26th Floor
New York, NY 10036

CERTIFICATE OF INSURANCE

Policy Number: ENPR2310001148-01

Endorsement (if applicable): Underground Storage Tank Schedule, EN PR 10 09 04 21

Period of Coverage: 11/01/2023 to 11/01/2026

Name of Insurer: Ascot Specialty Insurance Company

Address of Insurer: 55 W. 46th Street, 26th Floor, New York, NY 10036

Name of Insured: Freeman Holdings, LLC

Address of Insured: 16221 Foster Street, Overland Park, KS 66085

Certification:

1. Ascot Specialty Insurance Company, the "Insurer", as identified above, hereby certifies that it has issued liability insurance covering the following underground storage tank(s):

See Storage Tank Schedule of policy ENPR2310001148-01

for taking corrective action and/or compensating third parties for bodily injury and property damage caused by" either "sudden accidental releases" or "nonsudden accidental releases" or "accidental releases"; in accordance with and subject to the limits of liability, exclusions, conditions, and other terms of the policy; if coverage is different for different tanks or locations, indicate the type of coverage applicable to each tank or location] arising from operating the underground storage tank(s) identified above.

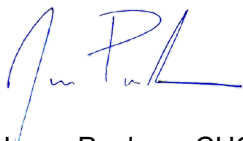
The limits of liability are \$1,000,000 each occurrence and \$2,000,000 annual aggregate limits of the Insurer's liability; if the amount of coverage is different for different types of coverage or for different underground storage tanks or locations, indicate the amount of coverage for each type of coverage and/or for each underground storage tank or location, exclusive of legal defense costs, which are subject to a separate limit under the policy. This coverage is provided under policy number ENPR2310001148-01. The effective date of said policy is November 1, 2023.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- a. Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this certificate applies.

- b. The Insurer is liable for the payment of amounts within any deductible applicable to the policy to the provider of corrective action or a damaged third-party, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in 40 CFR 280.95-280.102 and 280.104-280.107.
- c. Whenever requested by a Director of Oregon Dept of Environmental Quality, the Insurer agrees to furnish to the Director a signed duplicate original of the policy and all endorsements.
- d. Cancellation or any other termination of the insurance by the Insurer, except for non- payment of premium or misrepresentation by the insured, will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the insured. Cancellation for non-payment of premium or misrepresentation by the insured will be effective only upon written notice and only after expiration of a minimum of 10 days after a copy of such written notice is received by the insured.
- e. The insurance covers claims otherwise covered by the policy that are reported to the Insurer within six months of the effective date of cancellation or non-renewal of the policy except where the new or renewed policy has the same retroactive date or a retroactive date earlier than that of the prior policy, and which arise out of any covered occurrence that commenced after the policy retroactive date, if applicable, and prior to such policy renewal or termination date. Claims reported during such extended reporting period are subject to the terms, conditions, limits, including limits of liability, and exclusions of the policy.

I hereby certify that the wording of this instrument is identical to the wording in 40 CFR 280.97(b)(2) and that the Insurer is eligible to provide insurance as an excess or surplus lines insurer, in one or more states.



Jesse Paulson, CUO

Chief Underwriting Officer, Authorized Representative of Ascot Specialty Insurance Company

55 West 46th Street 26th Floor

New York, NY 10036



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Department of Environmental Quality

Northwest Region

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(503) 229-5263

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TTY 711

April 19, 2024

Scott Freeman
C/o Facility Manager
Freeman Holdings Oregon LLC
4002 Cirrus Dr
Medford, OR 97504

RE: UST Compliance Inspection
DEQ UST FACILITY #5229
Freeman Holdings Oregon LLC

Attention Scott Freeman,

The Oregon Department of Environmental Quality (DEQ) is conducting underground storage tank (UST) inspections throughout Oregon. The purpose of this letter is to inform you that your facility, among others, has been selected for inspection. A thorough inspection of your facility will be conducted to determine compliance with state and federal UST requirements. The inspection will include a file review, compliance testing documentation, and a site visit. **The date you receive this letter is the date that the inspection starts.** If you have work done after that date, you will need to have the previous set of records available for evaluation in addition to the most recent records.

I confirmed with Shane (Facility Manager); the site visit for this inspection for this facility is scheduled for May 14, 2024, starting at approximately 1100 AM. Please note that the inspection will require uninterrupted participation and attendance by you or a knowledgeable assistant. For the site visit part of the inspection, you **may** need to provide access to tank sumps, under dispenser areas, cathodic protection rectifiers, and leak monitoring equipment. DEQ will not touch the equipment or enter the facility; if you are unable to assist with equipment access, please have your UST Service Provider there.

To complete this inspection, you **will** need to have required **proof of financial responsibility** and proof of **A/B operator training** available on-site on the day of the inspection or sent to me prior to the inspection at dave.pardue@deq.oregon.gov. If the records are not available during the day of the inspection, you will have five (5) business days to provide the records to me electronically, after which time this facility may be subject to enforcement actions.

Our records indicate that the USTs at your facility are in Temporary Closure. During the site visit, the DEQ will verify that the tanks are empty as defined by OAR 340-150-0010(32) and the equipment is secure as indicated in OAR-340-0167.

At a **minimum** the following records are required to complete this inspection:

- Financial responsibility mechanism (insurance or other)
- Cathodic protection testing (if applicable).
- Tank lining records (if applicable).
- A/B Operator Training records

As stated previously, DEQ will not touch any equipment and if you are unable to assist with equipment access, please have your UST Service Provider there to remove manway or sump lids and be prepared to stick the tanks to show the presence of any liquid.

If violations are found at the time of the inspection without prior notification, DEQ is required to initiate enforcement action. For UST violations, enforcement usually begins with a field citation option, which includes paying a monetary fine and conducting corrective actions.

Some enforcement may be referred to the Office of Compliance and Enforcement for further review which may result in civil penalties.

Thank you for your cooperation. I can be reached at 503-360-4287 and dave.pardue@deq.oregon.gov to answer any questions you may have and assist you in the preparation for your inspection.

Sincerely,

Dave Pardue

Dave Pardue
Underground Storage Tank Program Coordinator

CC: File

Mark Drouin
UST Program
Mark.drouin@deq.oregon.gov
541-213-1204

Effective Date of Endorsement: 5/1/2024

Insured Name: Freeman Holdings, LLC

THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.

UNDERGROUND STORAGE TANK SCHEDULE

This endorsement modifies insurance provided under the following:

PRIME POLLUTION LIABILITY COVERAGE FORM

It is hereby agreed that the policy to which this Endorsement is attached is amended as follows:

- A. SECTION I – COMMON EXCLUSIONS**, Exclusion 7. **Underground Storage Tank** exception **b.** is amended to include the **underground storage tank(s)** identified in the Schedule below:

SCHEDULE OF UNDERGROUND STORAGE TANK(S):

Tank ID #	Address of Covered Location	Date Installed	Tank Size	Tank Contents	Deductible Per Tank
1	4002 Cirrus Drive Medford, OR	1981	10,000	Empty	\$500,000
2	4002 Cirrus Drive Medford, OR	1981	10,000	Empty	\$500,000
3	4002 Cirrus Drive Medford, OR	1981	15,000	Empty	\$500,000
4	4002 Cirrus Drive Medford, OR	1981	15,000	Empty	\$500,000

- B.** Solely as respects **bodily injury, property damage** or **environmental damage** caused by or resulting from a **pollution event** originating from or arising out of an **underground storage tank** identified in the Schedule of this Endorsement, the deductible amounts identified in **Item 4. Limits of Insurance and Deductible** are replaced by the Deductible Per Tank referenced in the Schedule above.

ALL OTHER TERMS, CONDITIONS AND EXCLUSIONS OF THIS POLICY REMAIN UNCHANGED.

PARDUE Dave * DEQ

From: Shane Hickman <shickman@millionair.com>
Sent: Friday, May 24, 2024 12:02 PM
To: PARDUE Dave * DEQ
Cc: GARCIA Andrea * DEQ
Subject: RE: KMFR UST Documents

Hello Dave:

Can you please provide any records you have indicating the tanks were lined and the reference used for internal inspection requirements before imposing any fines?

Thank you.

Cheers,

Shane Hickman
General Manager
Million Air Medford

2040 Milligan Way

Medford, OR 97504

541-842-2254 Main

541-784-6762 Cell

@MillionAirMFR

shaneh@millionairmfr.com

www.millionairmfr.com



From: PARDUE Dave * DEQ <dave.pardue@deq.oregon.gov>
Sent: Thursday, May 23, 2024 1:57 PM
To: Shane Hickman <shickman@millionair.com>
Cc: GARCIA Andrea * DEQ <Andrea.GARCIA@deq.oregon.gov>
Subject: RE: KMFR UST Documents

Hi Shane-

Our records indicate the Jet A tanks were both lined in 2010. Rule requires an internal inspection at ten years (2020) and every 5 years after that. Even if the tanks are empty, the lining is an important element of the corrosion protection system, and must be maintained if needed.

Owners are required to provide all maintenance and repair records to a new owner when they sell. It was incumbent upon Medford Air to inform you of the inspection requirements.

I am required to issue a citation for all infractions. There is also corrective action needed: have an internal lining inspection performed and submit the results to me.

There are two options: acknowledge and pay the citation and perform the corrective action, or contest the citation and provide information to our Office of Compliance and Enforcement. They may be able to negotiate with you.

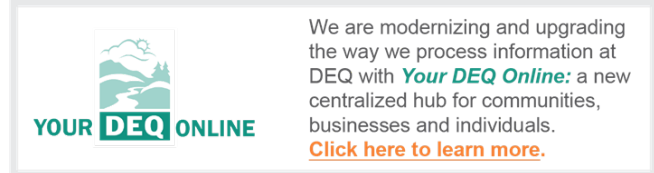
Regards,

Dave

Dave Pardue
Underground Storage Tank Program Coordinator
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232
503-229-6085
Pronouns: He/Him/His

Sign-up for UST Program Updates Here:

https://service.govdelivery.com/accounts/ORDEQ/subscriber/new?topic_id=ORDEQ_546



From: Shane Hickman <shickman@millionair.com>
Sent: Monday, May 20, 2024 10:05 AM
To: PARDUE Dave * DEQ <dave.pardue@deq.oregon.gov>
Cc: GARCIA Andrea * DEQ <andrea.garcia@deq.oregon.gov>
Subject: RE: KMFR UST Documents

Dave,

I added Andrea into this thread as she is the one I have dealt with in the past.

As for your question, I don't recall seeing anything like that. I have no record of the tanks ever being lined. It's not something we or the previous owner has ever been asked for since the tanks went into temporary storage. These tanks were purchased approximately 2013 from Medford Air, which led to the tanks being flushed and vacuumed, and the subsurface inspection being completed prior to the purchase and subsequent first temporary closure.

After speaking with the previous GM, the items below are the only ones that have been inspected since being put into temporary storage, except for the FR. The items listed below are also the only items listed on this year's

inspection sheet. The only thing I can think of is that since these tanks were purged, drained, and cleaned with a subsurface inspection, it was deemed to not be needed.

Below are the items from the notification letter and the only items that we have ever been asked to provide. This year the FR was requested, although that was never needed in the past due nor was it asked for at our annual permit renewal. I believe this was due to the nature of the temporary closure and the documents used for the closure.

- Review the proof of financial responsibility for the facility (OAR 340-151-0010).
- Review the proof of A/B operator training for the designated emergency contact for the facility (40 CFR §280.241).
- Make sure the tanks are empty and secured (OAR 340-150-0167).
- For steel tanks, review the records for the cathodic protection system, including the tri-annual testing records (OAR 340-150-0325).

Standing by for other questions.

Cheers,

Shane Hickman
General Manager
Million Air Medford

2040 Milligan Way
Medford, OR 97504
541-842-2254 Main
541-784-6762 Cell
@MillionAirMFR
shaneh@millionairmfr.com
www.millionairmfr.com



From: PARDUE Dave * DEQ <dave.pardue@deq.oregon.gov>
Sent: Monday, May 20, 2024 9:32 AM
To: Shane Hickman <shickman@millionair.com>
Subject: RE: KMFR UST Documents

That is great Shane- thanks.

Question: do you have 10-year internal lining inspection records? When a tank is lined there is a schedule for inspecting the lining: the first is at 10 years and then every 5 after that. Looks like the lining was done in 2010.

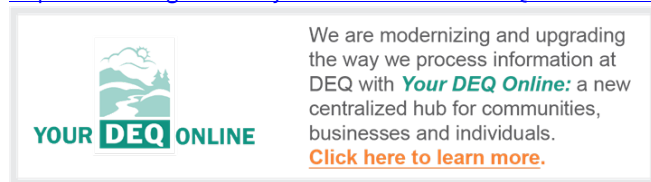
Thanks,

Dave

Dave Pardue
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From: Shane Hickman <shickman@millionair.com>
Sent: Monday, May 20, 2024 9:22 AM
To: PARDUE Dave * DEQ <dave.pardue@deq.oregon.gov>
Subject: RE: KMFR UST Documents

Good morning, Dave,

Here is the tank schedule for the USTs.

Thank you for your time and help.

Cheers,

Shane Hickman
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Medford, OR 97504
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time.

From: PARDUE Dave * DEQ <dave.pardue@deq.oregon.gov>
Sent: Thursday, May 16, 2024 2:52 PM
To: Shane Hickman <shickman@millionair.com>
Subject: RE: KMFR UST Documents

Hi Shane-

It was a pleasure to meet you and I enjoyed seeing your facility.
The attached COI is very good, but DEQ also needs the

“Underground Storage Tank Schedule, EN PR 10 09 04 21”.

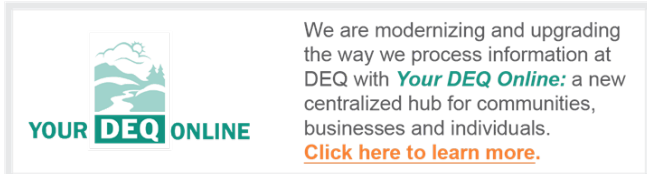
Can you see about getting a copy with that attached?

That would tie up the FR piece. I will provide a site visit summary shortly.

Regards,

Dave Pardue
Underground Storage Tank Program Coordinator
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232
503-229-6085
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From: Shane Hickman <shickman@millionair.com>
Sent: Monday, May 13, 2024 1:46 PM
To: PARDUE Dave * DEQ <dave.pardue@deq.oregon.gov>
Subject: RE: KMFR UST Documents

You don't often get email from shickman@millionair.com. [Learn why this is important](#)

Hello Dave:

Here is our cert of Insurance. Is there any other paperwork you are missing from me.

Cheers,

Shane Hickman
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Medford, OR 97504
541-842-2254 Main
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shaneh@millionairmfr.com
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From: PARDUE Dave * DEQ <dave.pardue@deq.oregon.gov>
Sent: Friday, May 10, 2024 1:23 PM
To: Shane Hickman <shickman@millionair.com>
Subject: RE: KMFR UST Documents

Hi Shane-

Looks great. For the FR: only a Certificate of Insurance is acceptable, and it must state specifically which tanks are covered.

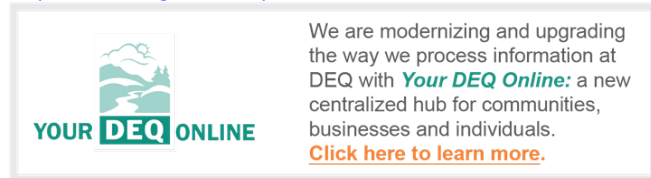
See you next week!

Dave

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From: Shane Hickman <shickman@millionair.com>
Sent: Tuesday, April 30, 2024 9:54 AM
To: PARDUE Dave * DEQ <dave.pardue@deq.oregon.gov>
Subject: KMFR UST Documents

You don't often get email from shickman@millionair.com. [Learn why this is important](#)

Good Morning Dave:

Thank you for the call back. Attached you will find our documents for the upcoming UST inspection.

Please let me know if you need any other documents other than the financial responsibility documents that I will have here onsite when you arrive.

Have a great rest of your week.

Cheers,

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PARDUE Dave * DEQ

From: Shane Hickman <shickman@millionair.com>
Sent: Wednesday, May 22, 2024 9:58 AM
To: PARDUE Dave * DEQ
Subject: RE: KMFR UST Documents
Attachments: Scan.pdf

Good Morning, Dave:

I have attached a better copy of the Underground Storage Tank Schedule, EN PR 10 09 04 21. I hope my last email made since.

Let me know if you have any other questions.

Thank you.

Cheers,

Shane Hickman
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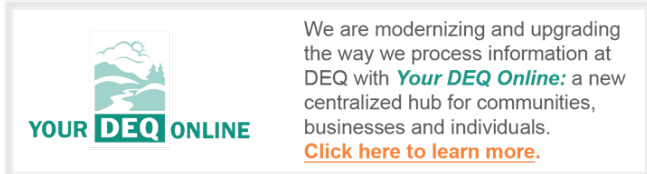
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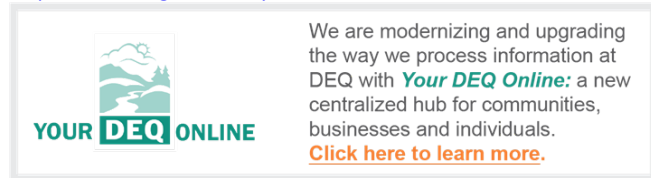
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Dave Pardue
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PARDUE Dave * DEQ

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Standing by for other questions.

Cheers,

Shane Hickman
General Manager
Million Air Medford
2040 Milligan Way
Medford, OR 97504
541-842-2254 Main
541-784-6762 Cell
@MillionAirMFR
shaneh@millionairmfr.com
www.millionairmfr.com



From: PARDUE Dave * DEQ <dave.pardue@deq.oregon.gov>
Sent: Monday, May 20, 2024 9:32 AM
To: Shane Hickman <shickman@millionair.com>
Subject: RE: KMFR UST Documents

That is great Shane- thanks.

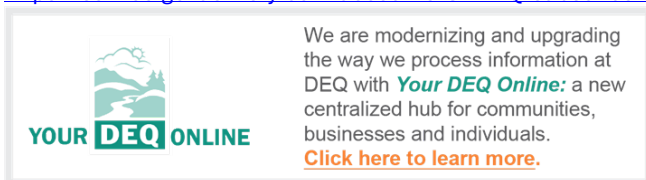
Question: do you have 10-year internal lining inspection records? When a tank is lined there is a schedule for inspecting the lining: the first is at 10 years and then every 5 after that. Looks like the lining was done in 2010.

Thanks,

Dave

Dave Pardue
Underground Storage Tank Program Coordinator
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232
503-229-6085
Pronouns: He/Him/His

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https://service.govdelivery.com/accounts/ORDEQ/subscriber/new?topic_id=ORDEQ_546



From: Shane Hickman <shickman@millionair.com>
Sent: Monday, May 20, 2024 9:22 AM
To: PARDUE Dave * DEQ <dave.pardue@deq.oregon.gov>
Subject: RE: KMFR UST Documents

Good morning, Dave,

Here is the tank schedule for the USTs.

Thank you for your time and help.

Cheers,

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time.

From: PARDUE Dave * DEQ <dave.pardue@deq.oregon.gov>

Sent: Thursday, May 16, 2024 2:52 PM

To: Shane Hickman <shickman@millionair.com>

Subject: RE: KMFR UST Documents

Hi Shane-

It was a pleasure to meet you and I enjoyed seeing your facility.
The attached COI is very good, but DEQ also needs the

“Underground Storage Tank Schedule, EN PR 10 09 04 21”.

Can you see about getting a copy with that attached?

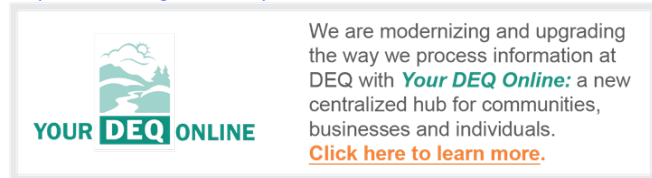
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From: Shane Hickman <shickman@millionair.com>
Sent: Monday, May 13, 2024 1:46 PM
To: PARDUE Dave * DEQ <dave.pardue@deq.oregon.gov>
Subject: RE: KMFR UST Documents

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Cheers,

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Sent: Friday, May 10, 2024 1:23 PM
To: Shane Hickman <shickman@millionair.com>
Subject: RE: KMFR UST Documents

Hi Shane-

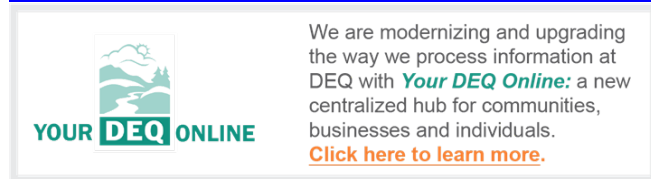
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See you next week!

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Sent: Tuesday, April 30, 2024 9:54 AM
To: PARDUE Dave * DEQ <dave.pardue@deq.oregon.gov>
Subject: KMFR UST Documents

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Good Morning Dave:

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Please let me know if you need any other documents other than the financial responsibility documents that I will have here onsite when you arrive.

Have a great rest of your week.

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From: Shane Hickman <shickman@millionair.com>
Sent: Monday, May 20, 2024 9:22 AM
To: PARDUE Dave * DEQ
Subject: RE: KMFR UST Documents
Attachments: MFR UST Tank Schedule.pdf

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Underground Storage Tank Program Coordinator

Oregon Department of Environmental Quality

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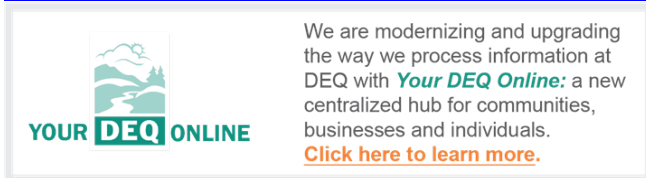
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PARDUE Dave * DEQ

From: Shane Hickman <shickman@millionair.com>
Sent: Thursday, May 16, 2024 3:17 PM
To: PARDUE Dave * DEQ
Subject: RE: KMFR UST Documents

Hello Dave:

It was nice to meet you as well. I will work to get you the tank schedule hopefully by tomorrow.

Cheers,

Shane Hickman
General Manager
Million Air Medford

2040 Milligan Way
Medford, OR 97504
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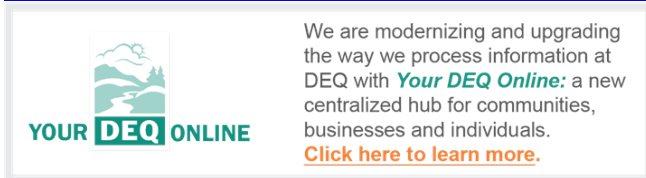
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PARDUE Dave * DEQ

From: Shane Hickman <shickman@millionair.com>
Sent: Tuesday, April 30, 2024 9:54 AM
To: PARDUE Dave * DEQ
Subject: KMFR UST Documents
Attachments: MFR UST A_B Training.pdf; TriAnnual cathodic Inspection.pdf; Monthly Rectifier Check.pdf

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From: Shane Hickman <shickman@millionair.com>
Sent: Monday, May 13, 2024 1:46 PM
To: PARDUE Dave * DEQ
Subject: RE: KMFR UST Documents
Attachments: 2024 UST Financial Assurance Cert_Federal_Freeman Holdings.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

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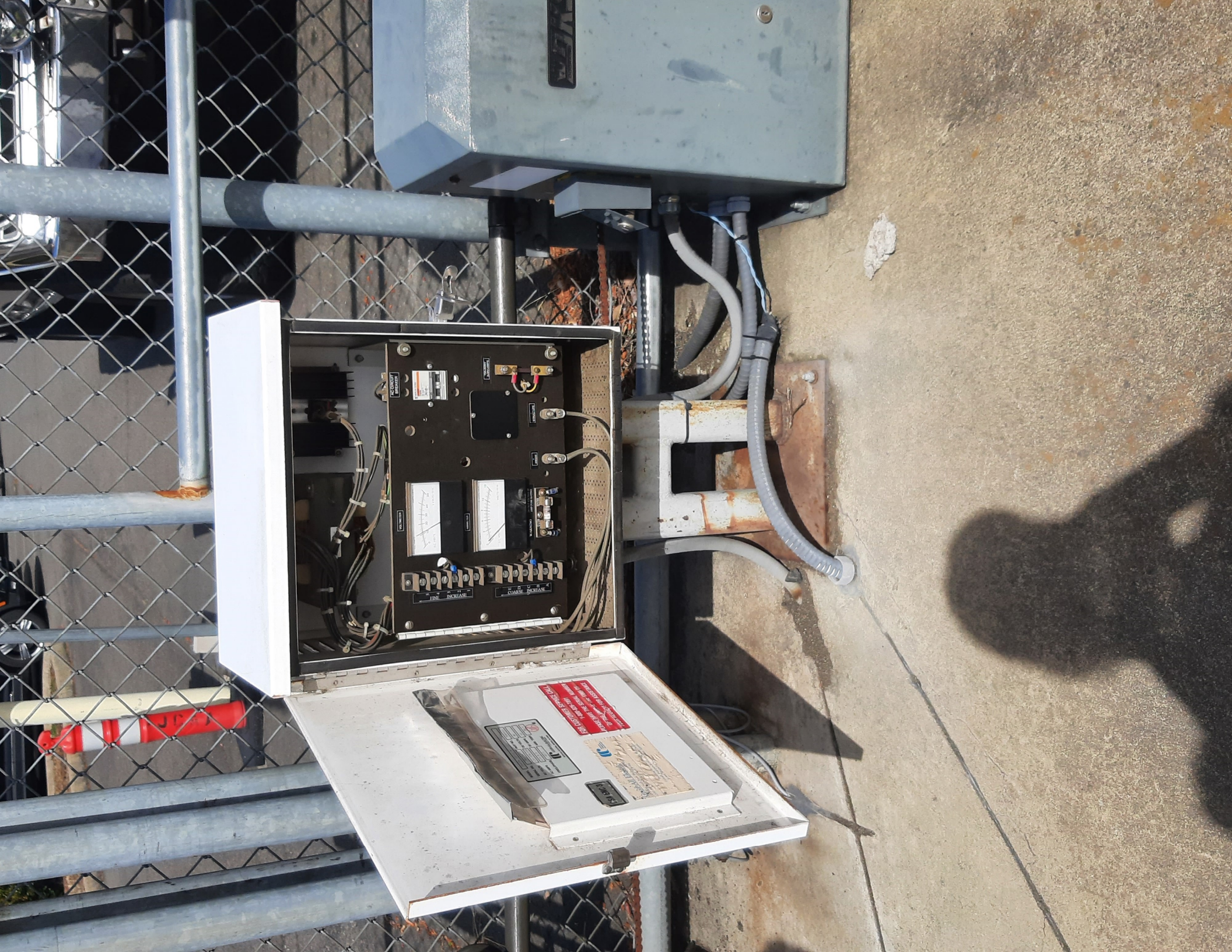
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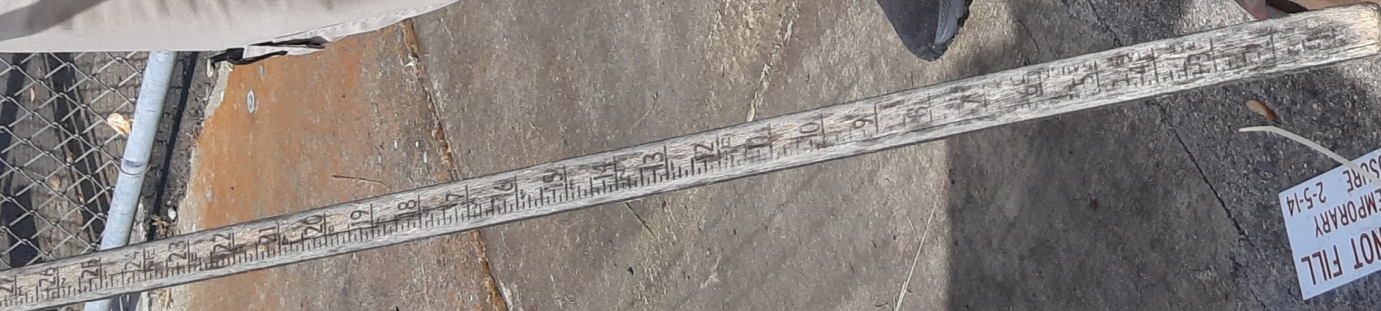
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