



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Headquarters

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

May 29, 2024

Todd Jordan
4 Jordans Investments, LLC
6246 SE Furnberg St.
Milwaukie, OR 97222-2881

RE: UST Compliance Inspection
DEQ UST # 9221
Richi's Place

Todd Jordan:

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.

The site visit for the inspection for this facility is scheduled for June 26, 2024, starting at approximately 9:00 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 must provide access to all tank sumps, and you will have to open and stick all tanks to measure the depth of any contents. DEQ will not touch the equipment. 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 diana.foss@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, 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.

If violations are found at the time of the inspection without prior notification by you, 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.

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 503-869-0770 or diana.foss@deq.oregon.gov to answer any questions you may have and assist you in the preparation for your inspection.

Sincerely,

Diana Foss

Senior Policy Analyst
UST Program

Oregon Department of Environmental Quality - Underground Storage Tank Program
Technical Compliance Inspection - UST Inspection Report (Temporary Closure)

Inspector: Diana Foss

Date: 6/26/24

Time: 9 am

Facility: 9221

I. Site Information					
Facility Name: Richi's Place			Permittee: Todd Jordan		
Site Address:			Organization: 4 Jordans Investment		
City:			Phone: (503) 706-5837		
II. Tank Information					
DEQ Permit #	BEAHG	BEAHH	BEAHJ		
Estimated Gallons	10000	3000	3000		
Substance	Gasoline	Gasoline	Diesel		
Tank Material	FRP	FRP	FRP		
Tank Install Date	11/29/1997	11/29/1997	11/29/1997		
Pipe Material	FRP	FRP	FRP		
Pipe Type	Pressure	Pressure	Pressure		
Pipe Install Date					
Overfill Device	Alarm	Alarm	Automatic shutoff		
Objective of field visit: FCI					
Notes and Comments from the UST database: ☐ Check file before conducting inspection TC expires 11/1/24					
III. Financial Responsibility			Compliance ☐ Yes ☐ No		
Type of coverage:		Begin Date:		End Date:	
Coverage amount correct:		Number of tanks covered:			
Financial responsibility could also be in the form of self insurance, bonds, local government, trust fund, and or guarantee					
IV. Corrosion Protection			Compliance ☐ Yes ☐ No		
☐ Cathodic ☐ Galvanic ☐ Impressed Current ☐ Fiberglass/composite tanks					
Steel tank with cathodic?			☐ Yes	☐ No	
Steel pipes with cathodic?			☐ Yes	☐ No	
Steel flex-lines with cathodic?			☐ Yes	☐ No	
Date of cathodic test: _____					
Last two tests available?			☐ Yes	☐ No	
Did last test pass?			☐ Yes	☐ No	
If not:					
Was failed test reported to DEQ?			☐ Yes	☐ No	
Was system repaired?			☐ Yes	☐ No	
Date of repair? _____					
Cathodic retested within 6 mos. of repair?			☐ Yes	☐ No	
Date of retesting? _____					
If impressed current system:					
Rectifier Operational?			☐ Yes	☐ No	
Rectifier log maintained?			☐ Yes	☐ No	
Rectifier been operating continuously			☐ Yes	☐ No	
☐ Tank Lining					
Date of lest test? _____					
Pressure test conducted after tank lining inspection?			☐ Yes	☐ No	

V. General notes from inspection

Representative onsite: Todd Jordan

email: _____

Compliance Determination: ☐ No Violations Observed ☒ Observed violations resulting in enforcement

Inspector Signature: *Diana Foss*

Date: 06/26/2024



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Tina Kotek, Governor

Department of Environmental Quality

Land Quality Division

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June 28, 2024

Todd Jordan
4 Jordans Investments, LLC
6246 SE Furnberg St
Milwaukie, OR 97222-2881

RE: **Pre-enforcement Notice**
Richi's Place
DEQ UST Facility #9221
2024-PEN-9383

Todd Jordan:

The Oregon Department of Environmental Quality (DEQ) believes 4 Jordans Investments, LLC has violated Oregon's environmental regulations at the underground storage tank (UST) facility #9221 located at 14749 S Juniper Canyon Road in. Prineville, OR.

On June 26, 2024, DEQ conducted a full compliance inspection at this facility. The equipment inspection and subsequent records review documented violations with the UST rules. DEQ has concluded that 4 Jordans Investments, LLC. is responsible for the following violations of Oregon Administrative Rules (OAR) 340-150.

Violations

- (1) OAR 340-150-0210(2) **Class II**. Failure to have a trained UST System Operator for an UST facility or to provide emergency response information
- (2) OAR 340-151-0010 **Class II** . Failure to provide documentation of compliance with financial responsibility upon request
- (3) OAR 340-150-0400(1)(a) and 340-150-0008(8) Failure to operate or maintain a method or combination of methods for release detection such that the method can detect a release from any portion of the UST system.

Corrective Action Requested

- (1) Submit proof of A/B operator training by August 1, 2024
- (2) Submit current proof of financial responsibility by July 12, 2024
- (3) Pump out the tanks and submit fuel disposal receipts by July 12, 2024

Recall that your temporary closure certificate expires on November 1, 2024. Your tanks must be brought back into service by that date.

This matter will be referred to the Department's Office of Compliance Enforcement for formal enforcement action, which may include assessment of civil penalties and/or issuance of a Department order. Your timely and responsive action on these items will be taken into consideration in any civil penalty assessment issued by the Department.

If you believe, any of the facts in this Pre-Enforcement Notice are in error you may provide written information to me at the address shown at the top of this letter. The Department will consider new information you submit in determining the appropriate enforcement actions that will be taken for these violations.

Please feel free to contact me at 503-869-0770 or diana.foss@deq.oregon.gov if you have any questions about compliance with DEQ's UST regulations.

Sincerely,

Diana Foss

Diana Foss
Senior Policy Analyst
Underground Storage Tanks Program