

PETROLEUM RELEASE FORM

Please Check All That Apply

INCIDENT INFORMATION

LOG NBR: (Dept. use only) 03-05-0461

RECEIVED BY: (Dept. use only) _____

☒ REGULATED UST

UST FAC NBR: (Dept. use only) 6024

DATE REPORTED: (today's date) 3 / 15 / 05

☐ NON-REGULATED UST

☐ HEATING OIL TANK

SITE NAME: Molalla Kwik Gas

SITE ADDRESS: 307 S Main

SITE CITY: Molalla ZIP: 97038

FUNDING: (Dept. use only) _____

SITE COUNTY: Clackamas

PHONE: _____

UPDATES: (Dept. use only) _____

MAIL CONTACTS

REPORTED BY (person reporting this release to the Dept.)

NAME: Wanda Peitz

COMPANY: SME INC

ADDRESS: _____

CITY: _____ ZIP: _____

STATE: _____ PHONE: 1 800 550 1515

INVOICE CONTACT (required, may be same as responsible party),

NAME: _____

COMPANY: _____

ADDRESS: _____

CITY: _____ ZIP: _____

STATE: _____ PHONE: _____

RESPONSIBLE PARTY (person responsible for remedial action)

NAME: Lee Powell Jr or Jason Powell

COMPANY: Powell Distributing

ADDRESS: Po Box 17160

CITY: Portland ZIP: 97217

STATE: OR PHONE: 503 289 5558

OTHER CONTACT(S) (not required)

NAME: _____

COMPANY: _____

ADDRESS: _____

CITY: _____ ZIP: _____

STATE: _____ PHONE: _____

SITE ASSESSMENT

DATE DISCOVERED: 3 / 15 / 05

DATE TANK IS EMPTY: ____ / ____ / ____

CONFIRMATION:

- ☐ SI) STAFF
- ☐ LD) LAB: DEQ
- ☐ LR) LAB: RP
- ☐ LO) LAB: OTHER
- ☐ RR) RP REPORT
- ☒ CN) CONTRACTOR
- ☐ OT) OTHER

DISCOVERY:

- ☐ RM) ROUTINE MONITORING
- ☐ DC) DECOMMISSIONING
- ☐ CP) COMPLAINT
- ☐ IC) INVENTORY CONTROL
- ☐ SA) SITE ASSESSMENT
- ☐ TT) TANK TEST
- ☒ OT) OTHER

CAUSE:

- ☐ TL) TANK LEAK
- ☒ PL) PIPE LEAK
- ☐ OF) OVERFILL
- ☐ SS) SURFACE SPILL
- ☐ PV) PUMP/VALVE LEAK
- ☐ OT) OTHER
- ☐ UN) UNKNOWN

CONTAMINANTS

- ☐ UG) UNLEADED GASOLINE
- ☐ LG) LEADED GASOLINE
- ☒ MG) MISC. GASOLINE
- ☐ DS) DIESEL (motor fuel)

- ☐ WO) WASTE OIL
- ☐ HO) HEATING OIL
- ☐ LB) LUBRICANT
- ☐ SV) SOLVENT

- ☐ OP) OTHER PET. DIST
- ☐ CH) CHEMICAL
- ☐ OT) OTHER
- ☐ UN) UNKNOWN

IMPACTS

- ☒ SL) SOIL
- ☐ GW) GROUNDWATER
- ☐ SW) SURFACE WATER
- ☐ DW) DRINKING WATER

- ☐ FV) FACILITY OR BUILDING (VAPOR)
- ☐ FP) FACILITY OR BUILDING (FREE PRODUCT.)

SITE-MANAGEMENT (THIS SECTION DEPT. USE ONLY)

RELEASE STOPPED: ____ / ____ / ____ FINAL REQUEST INVOICE DATE: ____ / ____ / ____

CLEANUP STARTED: ____ / ____ / ____ NO FURTHER ACTION: ____ / ____ / ____

NOTES/COMMENTS: _____

HOOD Robert

From: HOOD Robert
Sent: Monday, April 22, 2013 10:13 AM
To: 'John Day'
Subject: RE: Molalla Kwik Gas 03-05-0461

Ok. Thanks John. Look forward to seeing the reports. -Rob

From: John Day [mailto:jday@dayenv.com]
Sent: Thursday, April 18, 2013 1:51 PM
To: HOOD Robert
Subject: RE: Molalla Kwik Gas 03-05-0461

Rob, I am not sure why I didn't see the first two emails. I apologize for the delay.

The two additional monitoring wells were installed in April 2011. Quarterly groundwater monitoring has been conducted since.

We were holding off completing the Risk-based CAP until the summer when groundwater elevations would be lower, so the soil gas survey could be included. However, The ball was dropped on all reporting. You may recall that when we initially attempted the survey, depth to shallow groundwater was within 2 feet of ground surface.

I am working on a preliminary RBCAP (without a soil gas survey), which began in 2011. I project that it will be submitted to you within three weeks (by May 9). Individual groundwater monitoring report for each quarter will be submitted after that time-frame. A soil gas survey WILL be completed this summer in hopes of eliminating the vapor intrusion into buildings exposure pathway from the CSM.

Again, I apologize for not getting back to you sooner and for not submitting reports in a timely manner.

Thanks for your patience,
John Day

*John M. Day, RG, LHg
Principal Geologist
Environmental Compliance Northwest
(503) 936-4818 – Phone
(503) 213-9980 - Fax*

From: HOOD Robert [mailto:HOOD.Robert@deq.state.or.us]
Sent: Wednesday, April 17, 2013 9:19 AM
To: HOOD Robert; 'jday@dayenv.com'
Subject: RE: Molalla Kwik Gas 03-05-0461
Importance: High

John: Can you let me know the status? -Rob

From: HOOD Robert
Sent: Wednesday, March 13, 2013 4:37 PM

To: 'jday@dayenv.com'

Subject: RE: Molalla Kwik Gas 03-05-0461

Hi John: Wanted to follow-up on my email from November. Can you provide the status of the work that I approved in my letter dated 11 February 2011 (some monitoring wells and soil gas points)? Also, has sampling occurred. Thanks. - Rob

From: HOOD Robert

Sent: Thursday, November 08, 2012 11:08 AM

To: 'jday@dayenv.com'

Subject: Molalla Kwik Gas 03-05-0461

Hi John. Can you provide me an update of this site? I think some soil gas sampling was to be completed. Thanks. -Rob

Rob

Rob Hood

Project Manager, UST Cleanup Program

Oregon Dept. of Environmental Quality

2020 SW 4th Ave., Ste. 400

Portland, OR 97201-4987

Ph: (503) 229-5617

Fax: (503) 229-6945

email: hood.robert@deq.state.or.us

website: www.oregon.gov/deq

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website: www.oregon.gov/deq



ENVIRONMENTAL COMPLIANCE NORTHWEST

PO BOX 230163
PORTLAND, OR 97281

(503) 372-9760 Phone
(503) 213-9980 Fax

TRANSMITTAL

Date: May 26, 2011

File: 05-106

TO:

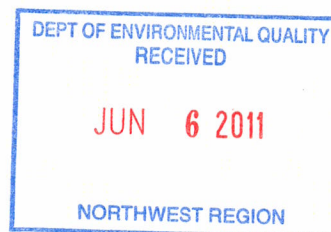
Mr. Rob Hood
Oregon DEQ-NW Region
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201

Subject

First Quarter 2011
Groundwater Monitoring Report
Former Kwik Gas Service Station
305 West Main Street
Molalla, Oregon

DEQ LUST File No.: 03-05-491

0461



We are sending the following:

One copy of the above-referenced report.

Remarks:

If you have any questions, please contact our office at (503) 372-9760.
Thank you.

By:

John M. Day, RG
Principal Geologist
President



ENVIRONMENTAL COMPLIANCE NORTHWEST

PO BOX 230163
PORTLAND, OR 97281

(503) 372-9760 Phone
(503) 213-9980 Fax

TRANSMITTAL

Date: February 18, 2011
File: 05-106

TO:

Mr. Rob Hood
Oregon DEQ, NW Region
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201

Subject

Fourth Quarter 2010
Groundwater Monitoring Report
Former Molalla Kwik Gas
305 West Main Street
Molalla, Oregon

DEQ LUST File No.: **03-05-461**



We are sending the following:

One copy of the above-referenced report.

Remarks:

If you have any questions, please contact our office at (503) 372-9760.
Thank you.

By:

John M. Day, R.G.
Principal Geologist
President



Oregon

John A. Kitzhaber, MD, Governor

Department of Environmental Quality

Northwest Region Portland Office
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987
(503) 229-5263
Fax: (503) 229-6945
TTY: (800) 736-2900

file

11 February 2011

JASON POWELL
POWELL DISTRIBUTING
PO BOX 17160
PORTLAND OR 97217

Re: Molalla Kwik Gas
File No. 03-05-0461

Dear Mr. Powell:

The Department of Environmental Quality (DEQ) has reviewed the nine submitted groundwater monitoring reports and the work plan dated 10 December 2010, regarding the underground storage tank (UST) cleanup at 305 West Main Street in Molalla, Oregon. From review and per discussion between your consultant, Mr. John Day {Environmental Compliance Northwest (ECN)} and me on 8 February 2011, DEQ has the following comments:

Groundwater Monitoring Reports:

- Please provide the purge water disposal receipts from the groundwater monitoring events.
- Please provide a topographic vicinity map as Figure 1 in future reports.
- The groundwater gradient at the site appears to be unusually steep. It was agreed that gradient will be further evaluated after measurements are collected from the newly added wells.

Work Plan:

-ECN proposes two additional monitoring wells. Based on discussion, the southern monitoring well location is acceptable. The northern location will be moved approximately 30 feet southwest of the proposed location (see attached Figure 1 for general location). For 2011, DEQ requests that two groundwater monitoring events be completed this year from the new wells and from monitoring wells MW-1 and MW-4 (near the time of installation and in approximately August or September 2011). At this time, there is no need to collect additional data from monitoring wells MW-2 and MW-3.



Molalla Kwik Gas
File No: 03-05-0461
11 February 2011
Page 2 of 2

For analytical methods, please complete the following:

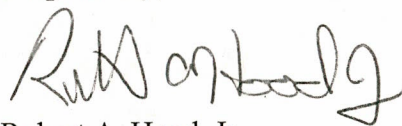
MW-1: NWTPH-Gx only (for first event only)
MW-4: NWTPH-Gx and Dx only (both events)
New wells (for both events): for the upgradient well, NWTPH-Gx and Dx only. For the downgradient or southern well, NWTPH-Gx and Dx and RBDM VOCs.

(Note, water level measurements should be collected from all wells)

-Based on soil and groundwater results, concentrations at the site exceed screening levels for the vapor intrusion into buildings exposure pathway. As a result, DEQ requests that two temporary soil gas points and one temporary sub-slab point be installed for the collection of subsurface vapor. Approximate locations are shown on the enclosed Figure 1 (noted as SG for soil gas locations and SS for the sub-slab location). However, you will want to verify conditions and propose any changes prior to the investigation. Soil gas and sub-slab procedures from DEQ's 2010 vapor intrusion guidance should be followed. Analyses should be completed using the EPA TO-15 Method (Gx and RBDM VOCs).

DEQ requests that the investigation be completed by **15 April 2011**. If you have any questions, please call me at (503) 229-5617.

Respectfully,



Robert A. Hood, Jr.
UST Cleanup Specialist

enclosure: Figure 1

cc: John Day
Environmental Compliance
Northwest
PO Box 230163
Portland, OR 97281

(rah:RAH)

MW-2	
D	= ND
O	= ND
Gx	= ND
B	= ND
T	= ND
E	= ND
X	= ND

FORMER UST CAVITY

MW-2

COMMERCIAL BUSINESS

MW-4	
D	= 1,410
O	= 244
Gx	= 18,100
B	= 470
T	= 7.34
E	= 776
X	= 432.2
1,2,4 TMB	= 65.0
EDB	= ND
EDC	= ND
1,3,5 TMB	= 665
IPB	= 153
MTBE	= 2.80
NPB	= 554
NAPH	= 756
LEAD	= 2.4
PAHs	SEE TABLE 2

MW-4

SG

MW
Historic Groundwater
Flow Direction

COMMERCIAL BUSINESS

MW-1

MW-1	
D	= ND
O	= ND
Gx	= ND
B	= ND
T	= ND
E	= ND
X	= ND

APPROXIMATE
PROPERTY LINE

SG

STATION
BUILDING

FORMER
SELF-SERVICE
CARWASH

DISPENSER ISLAND

MW-3

SIDEWALK

MAIN STREET

MW-3	
D	= 257
O	= ND
Gx	= 338
B	= ND
T	= ND
E	= ND
X	= ND
1,2,4 TMB	= ND
EDB	= ND
EDC	= ND
1,3,5 TMB	= ND
IPB	= 1.01
MTBE	= ND
NPB	= ND
NAPH	= ND

LEGEND

UST

Former UST

Former Underground Product
Piping Trench

Monitoring Well

Dx

D

O

Gx

B

T

E

X

TMB

EDB

EDC

IPB

MTBE

NPB

NAPH

LEAD

PAHs

Underground Storage Tank

Former Underground Storage Tank

Former Underground Product
Piping Trench

Monitoring Well

Diesel-Range Hydrocarbons

Diesel

Lube Oil

Gasoline-Range Hydrocarbons

Benzene

Toulene

Ethylbenzene

Total Xylenes

Trimethylbenzene

Ethylene Dibromide

Ethylene Dichloride

Isopropylbenzene

Methyl-Tertiary Butyl Ether

N-Propylbenzene

Naphthalene

Dissolved Lead

Polynuclear Aromatic Hydrocarbons

Results are in micrograms per liter (µg/L)



Proposed Monitoring Well Location

0 10' 20' 40'
1"=20' Scale in Feet



ECN

ENVIRONMENTAL
COMPLIANCE
NORTHWEST, INC.
(503) 372-9760

GROUNDWATER ANALYTICAL RESULTS
3RD QUARTER 2010
AND PROPOSED MONITORING WELL LOCATIONS
FORMER KWIK GAS
305 WEST MAIN STREET
MOLALLA, OREGON

Project No. 05-106

FIGURE 1

HOOD Robert

From: HOOD Robert
Sent: Friday, February 11, 2011 9:53 AM
To: 'John Day'
Subject: Molalla Qwik Gas Work Plan 03-05-0461

John: I was relooking a the data and it looks like an additional soil gas point may be necessary (if physically feasible). I put that in the letter, which is going out I hope today, but made some other reductions to groundwater analyticals to balance out the work. Have a look and let's reconnect after you review my letter. Thanks.

Rob

Rob Hood
Project Manager, UST Cleanup Program
Oregon Dept. of Environmental Quality
2020 SW 4th Ave., Ste. 400
Portland, OR 97201-4987
Ph: (503) 229-5617
Fax: (503) 229-6945
email: hood.robert@deq.state.or.us
website: www.oregon.gov/deq

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email: hood.robert@deq.state.or.us

website: www.oregon.gov/deq

HOOD Robert

From: HOOD Robert
Sent: Tuesday, February 08, 2011 2:10 PM
To: 'John Day'
Subject: RE: Molalla Kwik Gas, 03-05-0461, Work Plan

Thanks for the discussion today. Attached is the link for the VI guidance. Note, the sampling techniques are more advanced than in the past (like the use of tracer compounds is required now). Some people contract that out if they don't have the experience. Also, I my goal is to get my reply out this week. If not, early next week.

<http://www.deq.state.or.us/lq/pubs/docs/cu/VaporIntrusionGuidance.pdf>

Rob

From: John Day [mailto:jday@dayenv.com]
Sent: Monday, February 07, 2011 4:16 PM
To: HOOD Robert
Subject: RE: Molalla Kwik Gas, 03-05-0461, Work Plan

Rob,

1:30 tomorrow works for me. I will call you then.

Thanks,
John

From: HOOD Robert [mailto:HOOD.Robert@deq.state.or.us]
Sent: Monday, February 07, 2011 3:35 PM
To: John Day
Subject: Molalla Kwik Gas, 03-05-0461, Work Plan

John:

I was wondering if you had a couple of minutes for a phone call sometime this week to go over your work plan and regarding the groundwater monitoring reports. I could be available tomorrow at ~1:30, and I am around both Wednesday and Thursday. Thanks.

Rob

Rob Hood

Project Manager, UST Cleanup Program

Oregon Dept. of Environmental Quality

2020 SW 4th Ave., Ste. 400



ENVIRONMENTAL COMPLIANCE NORTHWEST

PO BOX 230163
PORTLAND, OR 97281

(503) 372-9760 Phone
(503) 213-9980 Fax

TRANSMITTAL

Date: December 15, 2010

File: 05-106

TO:

Mr. Rob Hood
Oregon DEQ, NW Region
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201

Subject

**Groundwater Monitoring Reports
And Work Plan
Former Molalla Kwik Gas
305 West Main Street
Molalla, Oregon**

DEQ LUST File No.: 03-05-461



We are sending the following:

One copy each of the 1st Quarter 2008 through 3rd Quarter 2010 Groundwater Monitoring Reports, and Work Plan for additional monitoring well installation and Risk-Based Corrective Action Plan preparation.

Remarks:

If you have any questions, please contact our office at (503) 372-9760.
Thank you.

By:

John M. Day, R.G.
Principal Geologist
President



ENVIRONMENTAL COMPLIANCE NORTHWEST

PO BOX 230163
PORTLAND, OR 97281

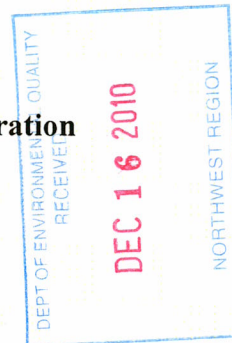
(503) 372-9760 Phone
(503) 213-9980 Fax

December 10, 2010
Project No. 05-106

Mr. Rob Hood
Oregon Department of Environmental Quality
Northwest Region
2020 SW Fourth Avenue, Suite 400
Portland, Oregon 97201

**Subject: Work Plan
Additional Monitoring Well Installation
Risk-Based Corrective Action Plan Preparation
Former Molalla Kwik Gas
305 West Main Street
Molalla, Oregon**

DEQ File No. 03-05-0461



Dear Mr. Hood:

Environmental Compliance Northwest, Inc., (ECN) has prepared this work plan to conduct additional site assessment activities and prepare a risk-based corrective action plan (RBCAP) for the subject site. This work plan addresses the Oregon Department of Environmental Quality's (DEQ's) request for further site activities addressed in letter dated 25-October-2010. Following is a brief description of site activities previously conducted and the proposed scope of services to meet the project objectives.

BACKGROUND

The following background information was obtained from DEQ files, verbal discussions with Powell Distributing Company (Powell) personnel, and activities observed and conducted by ECN. The facility operated since at least 1977 until 2005 and consisted of a retail fueling and automotive repair facility. The former UST system consisted of three gasoline USTs and one diesel UST, located in the northwest corner of the site and one fuel dispenser island, located in the southern portion of the site (Figure 1). In April 2005, an apparent leak was detected in the underground product piping. A portion of the piping was uncovered and several small holes were observed in the piping.

In March 2005, ECN conducted initial site assessment activities consisting of drilling two hand auger borings adjacent to the fuel product piping. Subsurface soil sampling indicated the

presence of petroleum hydrocarbon impact to soil in to the maximum explored depth of 8.5 feet below ground surface (bgs).

Also in March 2005, ECN conducted site assessment activities, including drilling a total of nine soil borings. Seven borings were completed adjacent and in the vicinity of the underground product piping trench. Two of the borings were completed adjacent to the former fuel island. Petroleum hydrocarbons were detected in soil samples collected from each boring, with the exception of the boring completed located near the northwest corner of the former service station building. Grab groundwater samples were collected from four of the borings. Petroleum hydrocarbons were detected in each grab groundwater sample collected.

Between September and October 2006, the UST system (consisting of four USTs and underground product piping) were decommissioned by removal. Two soil samples were collected from beneath each UST. In addition, one soil sample was collected from the south sidewall of the UST cavity and from beneath each of the three former fuel dispensers.

Petroleum hydrocarbons were not detected the soil samples collected from beneath the former USTs, with the exception of the southeastern portion of the former UST cavity, near the location where the product piping entered the cavity. Gasoline- and diesel-range hydrocarbons were detected in the soil samples collected from the former fuel dispensers.

A total of four monitoring wells (MW-1 through MW-4) were installed and two soil borings (B-101 and B-102) were completed in May 2007. The locations of the monitoring wells are shown on Figures 2 and 3. Borings B-101 and B-102 were drilled north and east of the existing building, respectively, to further define soil and groundwater impacts. Laboratory results indicated that the highest petroleum hydrocarbons were detected in the samples collected from MW-4, located adjacent to the former underground product piping. Lower petroleum hydrocarbon concentrations were detected in the other three monitoring wells, as well as in boring B-102.

Ongoing groundwater monitoring has been conducted at the site since the monitoring wells were installed. Petroleum hydrocarbons have not been detected in either MW-1 or MW-2 since at least the second quarter 2009 monitoring event.

PROPOSED SCOPE OF WORK

Based on the results of the site assessment activities in 2005 and 2007, as well as groundwater monitoring activities, and the above-referenced DEQ letter dated 25-October-2010, we propose

additional assessment activities consisting of installation of two additional groundwater monitoring wells at the site and preparation of an RBCAP.

Shallow groundwater flow at the site varies between west-southwest and southwest. Based on previous site assessment activities conducted onsite, the shallow water-bearing zone is anticipated to be encountered at depths ranging from approximately 8 to 13 feet bgs.

One monitoring well is proposed in the hydraulically up-gradient direction, north of the existing building, near the northern property boundary. The other monitoring well is proposed to be installed near the southern property boundary, southwest of the former fuel dispenser island. The proposed monitoring well locations are shown on Figure 1.

DRILLING AND SOIL SAMPLING

Prior to intrusive field activities, the Utility Notification Center will be contacted to locate underground utilities adjacent to the subject site.

Based on the anticipated drilling conditions, drilling will be conducted using hollow-stem auger drilling technology. Each well bore will be logged in the field by an Oregon-Registered Geologist. Soil will be sampled from a maximum of five-foot intervals during drilling. Olfactory and visual indications of impact will be observed and noted. The sample with the highest indication of impact from each boring will be submitted for laboratory analysis. If evidence of impact is not observed, the soil sample collected from approximately the soil/shallow groundwater interface will be analyzed. The soil samples will be placed in laboratory-supplied containers, labeled, stored in an ice-filled cooler, and transported to an analytical laboratory following chain-of-custody protocols.

The wells will be constructed of 2-inch diameter PVC and completed to a depth of approximately 20 to 25 feet below the ground surface (bgs), and screened from approximately 5 to the total depth the boring. Following installation, each well will be developed until relatively sediment-free.

The top of casing elevations of the newly installed monitoring wells will be surveyed relative to the existing monitoring well elevations.

GROUNDWATER MONITORING

Groundwater samples will be collected from each of the monitoring wells. Before sampling, water level measurements will be recorded, and the presence of light non-aqueous phase liquid (LNAPL) will be assessed. Each well will then be purged of groundwater to obtain a water sample that is representative of the groundwater in the shallow water-bearing zone. The monitoring wells will be purged using a bailer or a pump to avoid agitating the water or exposing it to air. Purging will continue until a minimum of three well casing volumes have been evacuated. The samples will be placed in an iced cooler and transported to an analytical laboratory following chain-of-custody protocols.

ANALYTICAL PROGRAM

Based on previously completed work at the site, soil samples will be analyzed for gasoline- and diesel-range hydrocarbons. Soil samples with detectable concentrations of gasoline will be analyzed for the DEQ RBDM volatile organic compounds (VOCs) contained in the September 2003 and 2009 RBDM guidance documents. The soil sample with the highest concentration of diesel will be additionally analyzed for polynuclear aromatic hydrocarbons (PAHs).

In accordance with DEQ requirements, each groundwater sample will be analyzed for gasoline- and diesel-range hydrocarbons, as well as, DEQ RBDM VOCS. Samples with diesel concentrations of at least 500 micrograms per liter will also be analyzed for PAHs. Select samples will also be analyzed for dissolved lead.

INVESTIGATION DERIVED WASTE MANAGEMENT

Soil, decontamination rinsate, and purge water generated during investigation activities will be stored in drums onsite pending laboratory results. If analytical results indicate the presence of petroleum hydrocarbons, soil will be transported to an appropriate landfill for disposal. Purged water from sampling and decontamination rinsate will be transported to an approved facility for treatment and disposal.

RISK-BASED CORRECTIVE ACTION PLAN

Following receipt of the analytical results, ECN will prepare a report presenting a discussion and findings of the additional monitoring well installation activities. The report will also include an RBCAP, consisting of previous site activities, beneficial land and water use surveys, utility

evaluation, conceptual site model, and proposed corrective action measures. Soil and groundwater contaminant plume maps will also be included in the RBCAP.

SCHEDULE

We are prepared to commence work as soon as practical after receiving the notice to proceed and consensus with DEQ regarding our technical approach.

CLOSING

We appreciate your assistance on this project. Should you require additional information or have questions regarding this project, please contact us at (503) 372-9760.

Sincerely,

ENVIRONMENTAL COMPLIANCE NORTHWEST, INC.

A handwritten signature in blue ink, appearing to read "J. M. Day", is positioned above the printed name.

John M. Day, R.G.
Principal Geologist
President

Attachment: Figure 1 – Groundwater Analytical Results, 3rd Quarter 2010 and Proposed
Monitoring Well Locations

cc: Jason Powell-Powell Distributing

MW-2	
D	= ND
O	= ND
Gx	= ND
B	= ND
T	= ND
E	= ND
X	= ND

FORMER UST CAVITY

MW-2

COMMERCIAL BUSINESS

MW-4	
D	= 1,410
O	= 244
Gx	= 18,100
B	= 470
T	= 7.34
E	= 776
X	= 432.2
1,2,4 TMB	= 65.0
EDB	= ND
EDC	= ND
1,3,5 TMB	= 665
IPB	= 153
MTBE	= 2.80
NPB	= 554
NAPH	= 756
LEAD	= 2.4
PAHs	SEE TABLE 2

MW-4

Historic Groundwater
Flow Direction

STATION
BUILDING

FORMER
SELF-SERVICE
CARWASH

COMMERCIAL BUSINESS

MW-1

MW-1	
D	= ND
O	= ND
Gx	= ND
B	= ND
T	= ND
E	= ND
X	= ND

APPROXIMATE
PROPERTY LINE

DISPENSER ISLAND

MW-3

SIDEWALK

MAIN STREET

MW-3	
D	= 257
O	= ND
Gx	= 338
B	= ND
T	= ND
E	= ND
X	= ND
1,2,4 TMB	= ND
EDB	= ND
EDC	= ND
1,3,5 TMB	= ND
IPB	= 1.01
MTBE	= ND
NPB	= ND
NAPH	= ND

LEGEND

UST

Underground Storage Tank

Former UST

Former Underground Storage Tank

Former Underground Product
Piping Trench

Dx

Monitoring Well

D

Diesel-Range Hydrocarbons

O

Diesel

Gx

Lube Oil

B

Gasoline-Range Hydrocarbons

T

Benzene

E

Toulene

X

Ethylbenzene

TMB

Total Xylenes

EDB

Trimethylbenzene

EDC

Ethylene Dibromide

IPB

Ethylene Dichloride

MTBE

Isopropylbenzene

NPB

Methyl-Tertiary Butyl Ether

NAPH

N-Propylbenzene

LEAD

Naphthalene

PAHs

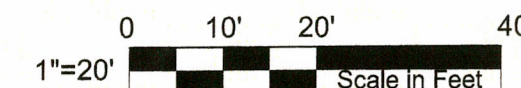
Dissolved Lead

Polynuclear Aromatic Hydrocarbons

Results are in micrograms per liter (µg/L)



Proposed Monitoring Well Location



ECN

ENVIRONMENTAL
COMPLIANCE
NORTHWEST, INC.
(503) 372-9760

GROUNDWATER ANALYTICAL RESULTS
3RD QUARTER 2010
AND PROPOSED MONITORING WELL LOCATIONS
FORMER KWIK GAS
305 WEST MAIN STREET
MOLALLA, OREGON

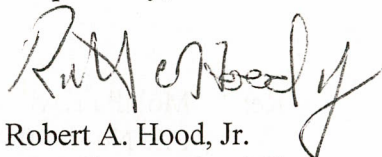
Project No. 05-106

FIGURE 1

Molalla Kwik Gas
File No: 03-05-0461
25 October 2010
Page 2 of 2

Please provide a work plan for additional investigation by **22 November 2010**. If you have any questions, please call me at (503) 229-5617.

Respectfully,

A handwritten signature in dark ink, appearing to read "R. Hood, Jr.", written in a cursive style.

Robert A. Hood, Jr.
UST Cleanup Specialist

cc: John Day
Environmental Compliance
Northwest
PO Box 230163
Portland, OR 97281

(rah:RAH)



Oregon

Theodore R. Kulongoski, Governor

Department of Environmental Quality

Northwest Region Portland Office
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987
(503) 229-5263
Fax: (503) 229-6945
TTY: (503) 229-5471

25 October 2010

JASON POWELL
POWELL DISTRIBUTING
PO BOX 17160
PORTLAND OR 97217

Re: Molalla Kwik Gas
File No. 03-05-0461

Dear Mr. Powell:

The Department of Environmental Quality (DEQ) has completed review of the report submitted by Environmental Compliance Northwest (ECN), dated 14 October 2010, regarding the underground storage tank cleanup at 307 South Main Street in Molalla, Oregon. In the report ENC provides two conclusions, which are as follows: 1) the extent of petroleum contamination has been determined and 2) discuss possible passive remediation in the vicinity of monitoring well MW-4.

On item 1), groundwater results appear to show that while petroleum concentrations at the northwest, west, and south boundaries are not significantly elevated, the full extent has not been determined. With that, please provide soil and groundwater plume maps and provide a work plan for additional investigation to complete delineation.

On item 2), DEQ requests that a more complete risk evaluation of data collected thus far be completed prior to determining the need for remediation. This evaluation should include beneficial land and water use determinations (including actual zoning documentation for the land use evaluation).

Other: As discussed with ECN, the quarterly reports from groundwater monitoring have not been submitted and are overdue. Please submit these reports **as soon as possible**. Some of the missing information, particularly groundwater flow direction trends, will need to be evaluated in determining additional boring locations (which DEQ should have that information for work plan evaluation).



ENVIRONMENTAL COMPLIANCE NORTHWEST

PO BOX 230163
PORTLAND, OR 97281

(503) 372-9760 Phone
(503) 213-9980 Fax

TRANSMITTAL

Date: October 14, 2010
File: 05-106

TO:

Mr. Rob Hood
Oregon DEQ, NW Region
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201

Subject

**Additional Site Assessment and Monitoring
Well Installation Report
Former Molalla Kwik Gas
305 West Main Street
Molalla, Oregon**

DEQ LUST File No.: 03-05-461

We are sending the following:

One copy of the above-referenced report and summary of groundwater analytical results.

Remarks:

If you have any questions, please contact our office at (503) 372-9760.
Thank you.

By:

John M. Day, R.G.
Principal Geologist
President

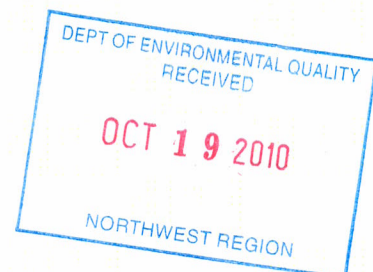


TABLE 1
Groundwater Analytical Results - TPH-Dx, TPH-G, RBDM VOCs, and Dissolved Lead
Former Kwik Gas Station
305 West Main Street
Molalla, Oregon
ECN Project No. 05-106



Well I.D.	Date of Sampling	Casing Elevation (Feet)	Depth to Water (Feet)	Groundwater Elevation (Feet)	Change in Elevation (Feet)	TPH-Dx [1]		TPH-G [2]	B [3]	T [3]	E [3]	X [3]	1,2,4-TMB [3]	EDB [3]	EDC [3]	1,3,5-TMB [3]	IPB [3]	MTBE [3]	NPB [3]	Naphthalene [3]	Dissolved Lead [4]	LAB
						Diesel	Lube Oil															
MW-1	6/5/2007	94.77	13.82	80.95	---	247	116	624	40.5	7.16	51.2	67.4	9.34	ND<1.00	ND<1.00	5.98	2.95	ND<1.00	5.04	ND<1.00	---	SA
	3/30/2008	94.77	8.06	86.71	5.76	ND<245	ND<491	ND<100	ND<0.300	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	---	SA
	9/28/2008	94.77	17.41	77.36	-9.35	ND<243	ND<487	ND<100	ND<0.300	ND<0.500	ND<0.500	ND<1.50	---	---	---	---	---	---	---	---	---	SA
	3/26/2009	94.77	9.54	85.23	7.87	ND<238	ND<476	ND<100	ND<0.300	ND<0.500	ND<0.500	ND<1.50	---	---	---	---	---	---	---	---	---	SA
	6/30/2009	94.77	14.43	80.34	-4.89	ND<86.3	ND<216	---	0.910	ND<1.00	ND<1.00	ND<3.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	---	SA
	9/29/2009	94.77	20.13	74.64	-5.7	ND<249	ND<498	ND<100	ND<0.300	ND<0.500	ND<0.500	ND<1.50	---	---	---	---	---	---	---	---	---	SA
	12/26/2009	94.77	10.54	84.23	9.59	ND<243	ND<487	ND<100	ND<0.300	ND<0.500	ND<0.500	ND<1.50	---	---	---	---	---	---	---	---	---	SA
	3/30/2010	94.77	8.74	86.03	1.8	ND<77.1	ND<193	ND<100	ND<0.300	ND<1.00	ND<1.00	ND<3.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	---	SA
	6/30/2010	94.77	12.83	81.94	-4.09	ND<76.1	ND<190	ND<100	ND<0.300	ND<0.500	ND<0.500	ND<1.50	---	---	---	---	---	---	---	---	---	SA
9/28/2010	94.77	16.38	78.39	-3.55	ND<82.6	ND<210	ND<100	ND<0.300	ND<0.500	ND<0.500	ND<1.50	---	---	---	---	---	---	---	---	---	SA	
MW-2	6/5/2007	93.73	9.36	84.37	---	237	ND<100	ND<100	ND<0.300	ND<0.500	ND<0.500	ND<1.50	---	---	---	---	---	---	---	---	---	SA
	3/30/2008	93.73	3.35	90.38	6.01	ND<248	ND<495	ND<100	ND<0.300	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	---	SA
	9/28/2008	93.73	11.10	82.63	-7.75	ND<242	ND<483	ND<100	ND<0.300	ND<0.500	ND<0.500	ND<1.50	---	---	---	---	---	---	---	---	---	SA
	3/26/2009	93.73	3.50	90.23	7.6	ND<236	ND<473	ND<100	ND<0.300	ND<0.500	ND<0.500	ND<1.50	---	---	---	---	---	---	---	---	---	SA
	6/30/2009	93.73	9.36	84.37	-5.86	ND<82.5	ND<206	---	ND<0.300	ND<1.00	ND<1.00	ND<3.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	---	SA
	9/29/2009	93.73	14.09	79.64	-4.73	ND<485	ND<971	ND<100	ND<0.300	ND<0.500	ND<0.500	ND<1.50	---	---	---	---	---	---	---	---	---	SA
	12/26/2009	93.73	4.03	89.70	10.06	ND<275	ND<552	ND<100	ND<0.300	ND<0.500	ND<0.500	ND<1.50	---	---	---	---	---	---	---	---	---	SA
	3/30/2010	93.73	3.42	90.31	0.61	ND<77.8	ND<195	ND<100	ND<0.300	ND<1.00	ND<1.00	ND<3.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	---	SA
	6/30/2010	93.73	8.12	85.61	-4.7	ND<76.6	ND<192	ND<100	ND<0.300	ND<0.500	ND<0.500	ND<1.50	---	---	---	---	---	---	---	---	---	SA
9/28/2010	93.73	9.23	84.50	-1.11	ND<78.7	ND<197	ND<100	ND<0.300	ND<0.500	ND<0.500	ND<1.50	---	---	---	---	---	---	---	---	---	SA	
MW-3	6/5/2007	93.44	6.65	86.79	---	ND<49.9	ND<49.9	363	ND<0.300	0.84	2.04	ND<1.50	---	---	---	---	---	---	---	---	---	SA
	3/30/2008	93.44	4.31	89.13	2.34	269	ND<485	589	ND<0.300	ND<1.00	ND<1.00	ND<3.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	---	SA
	9/28/2008	93.44	6.46	86.98	-2.15	350	ND<541	787	ND<0.300	ND<1.00	ND<1.00	ND<3.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	1.00	ND<1.00	ND<1.00	ND<1.00	0.65	SA
	3/26/2009	93.44	4.62	88.82	1.84	0.277	ND<478	429	ND<0.300	ND<1.00	ND<1.00	ND<3.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	1.1	SA
	6/30/2009	93.44	6.79	86.65	-2.17	194	ND<203	---	ND<0.300	ND<1.00	ND<1.00	ND<3.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	1.21	ND<1.00	ND<1.00	ND<1.00	1.1	SA
	9/29/2009	93.44	8.96	84.48	-2.17	275	ND<482	631	ND<0.300	ND<1.00	ND<1.00	ND<3.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	1.26	ND<1.00	ND<1.00	ND<1.00	1.8	SA
	12/26/2009	93.44	4.39	89.05	4.57	336	ND<513	245	ND<0.300	ND<1.00	ND<1.00	ND<3.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	1.26	ND<1.00	ND<1.00	ND<1.00	0.96	SA
	3/30/2010	93.44	4.09	89.35	0.3	216	235	477	ND<0.300	ND<1.00	ND<1.00	ND<3.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	2.58	ND<1.00	ND<1.00	1.48	---	SA
	6/30/2010	93.44	6.31	87.13	-2.22	291	215	749	1.26	ND<1.00	1.70	ND<3.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	---	SA
9/28/2010	93.44	5.71	87.73	0.6	257	ND<193	338	ND<0.300	ND<1.00	ND<1.00	ND<3.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	1.01	ND<1.00	ND<1.00	ND<1.00	---	SA	
MW-4	6/5/2007	94.10	7.16	86.94	---	2,060	3,500	7,370	326	5.97	216	336.2	239	ND<1.00	ND<1.00	55	34.4	6.92	66.2	55.6	14	SA
	3/30/2008	94.10	4.29	89.81	2.87	2,050	ND<489	15,900	985	8.93	397	343.0	386	ND<1.00	ND<1.00	43.4	92.2	11.3	261	150	2.5	SA
	9/28/2008	94.10	7.69	86.41	-3.4	2,070	665	14,000	979	9.74	743	167.8	332	ND<1.00	ND<1.00	88.3	125	ND<1.00	460	766	0.34	SA
	3/26/2009	94.10	4.54	89.56	3.15	1,700	0.893	8,010	480	4.49	356	91.4	125	ND<1.00	ND<1.00	23.7	87.6	1.80	185	119	0.82	SA
	6/30/2009	94.10	7.65	86.45	-3.11	1,460	310	---	682	7.28	769	248.2	594	ND<1.00	ND<1.00	76.7	133	2.62	438	347	1.4	SA
	9/29/2009	94.10	12.75	81.35	-5.1	2,760	805	13,300	925	7.07	889	30.00	30.4	ND<1.00	ND<1.00	34.3	115	7.16	395	540	1.5	SA
	12/26/2009	94.10	4.36	89.74	8.39	2,730	1,020	21,100	397	4.84	435	361.2	451	ND<1.00	ND<1.00	25.5	114	1.43	245	509	ND<0.10	SA
	3/30/2010	94.10	4.55	89.55	-0.19	1,094	532	12,200	594	5.31	634	330.9	530	ND<1.00	ND<1.00	60.4	128	ND<1.00	515	274	1.8	SA
	6/30/2010	94.10	6.49	87.61	-1.94	2,350	585	11,600	705	5.27	419	396.2	115	ND<1.00	ND<1.00	35.6	117	2.17	368	136	---	SA
9/28/2010	94.10	7.12	86.98	-0.63	1,410	244	18,100	470	7.34	776	432.2	65.0	ND<1.00	ND<1.00	665	153	2.80	554	756	2.4	SA	
Risk-Based Concentrations [5]																						
- Volatilization to Outdoor Air (Occupational)						>S	NE	>S	14,000	>S	41,000	>S	>S	960	9,500	6,800	>S	1,000,000	NE	16,000	NV	
- Vapor Intrusion Into Buildings (Occupational)						>S	NE	>S	2,800	>S	7,400	>S	>S	690	3,800	41,000	>S	590,000	NE	10,000	NV	
- Groundwater in an Excavation (Construction and Excavation Worker)						>S	NE	13,000	1,700	210,000	4,400	23,000	1,700	28	630	1,400	>S	62,000	NE	500	>S	

ABBREVIATIONS:
B: Benzene
T: Toluene
E: Ethylbenzene
X: Total Xylenes
MTBE: Methyl tertiary-butyl ether
ND: Not detected at or above the indicated laboratory reporting limit
NE: Not established by DEQ
>S: The groundwater RBC exceeds the solubility limit.
NV: This chemical is considered "nonvolatile" for purposes of the exposure calculations

Results are in micrograms per liter (µg/L)
(1) Northwest Method NWTPH-Dx
(2) Northwest Method NWTPH-Gx
(3) EPA Method 8021B or 8260B
(4) EPA Method 6011
(5) Oregon Department of Environmental Quality (DEQ) Generic Risk Based Concentrations (RBCs)
SA Specialty Analytical
BOLD Exceeds the RBC

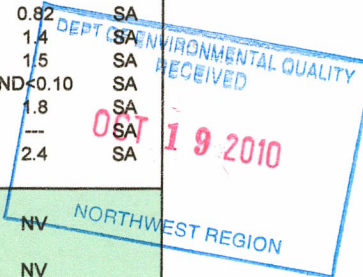


TABLE 2
Groundwater Analytical Results (PAHs)
Former Molalla Kwik Gas
305 West Main Street
Molalla, Oregon
ECN Project No. 05-106



Polynuclear Aromatic Hydrocarbons (µg/L) [1]		Acenaphthene	Acenaphthylene	Anthracene	Benz(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(g,h,i)perylene	Benzo(k)fluoranthene	Chrysene	Dibenz(a,h)anthracene	Fluoroanthene	Fluorene	Indeno(1,2,3-cd)pyrene	Naphthalene	Phenanthrene	Pyrene	LAB
Sample Identification	Sample Date																	
MW-1	6/5/2007	ND<0.0503	ND<0.0503	ND<0.0503	ND<0.0503	ND<0.0503	ND<0.0503	ND<0.0503	ND<0.0503	ND<0.0503	ND<0.0503	ND<0.0503	ND<0.0503	ND<0.0503	2.81	ND<0.0503	ND<0.0503	SA
MW-2	6/5/2007	ND<0.0498	ND<0.0498	ND<0.0498	ND<0.0498	ND<0.0498	ND<0.0498	ND<0.0498	ND<0.0498	ND<0.0498	ND<0.0498	ND<0.0498	ND<0.0498	ND<0.0498	ND<0.0498	ND<0.0498	ND<0.0498	SA
MW-3	6/5/2007	ND<0.0495	ND<0.0495	ND<0.0495	ND<0.0495	ND<0.0495	ND<0.0495	ND<0.0495	ND<0.0495	ND<0.0495	ND<0.0495	ND<0.0495	0.0792	ND<0.0495	0.287	ND<0.0495	ND<0.0495	SA
	3/26/2009	ND<0.0479	ND<0.0479	ND<0.0479	ND<0.0479	ND<0.0479	ND<0.0479	ND<0.0479	ND<0.0479	ND<0.0479	ND<0.0479	ND<0.0479	ND<0.0479	ND<0.0479	0.211	ND<0.0479	ND<0.0479	SA
	6/30/2009	0.0572	ND<0.0477	ND<0.0477	ND<0.0477	ND<0.0477	ND<0.0477	ND<0.0477	ND<0.0477	ND<0.0477	ND<0.0477	ND<0.0477	0.124	ND<0.0477	0.734	ND<0.0477	ND<0.0477	SA
	6/30/2010	0.0576	ND<0.0480	ND<0.0480	ND<0.0480	ND<0.0480	ND<0.0480	ND<0.0480	ND<0.0480	ND<0.0480	ND<0.0480	ND<0.0480	0.182	ND<0.0480	0.480	ND<0.0480	ND<0.0480	SA
MW-4	6/5/2007	0.115	ND<0.0525	ND<0.0525	ND<0.0525	ND<0.0525	ND<0.0525	ND<0.0525	ND<0.0525	ND<0.0525	ND<0.0525	ND<0.0525	0.136	ND<0.0525	83.4	0.0630	ND<0.0525	SA
	3/30/2008	0.231	ND<0.0482	ND<0.0482	ND<0.0482	ND<0.0482	ND<0.0482	ND<0.0482	ND<0.0482	ND<0.0482	ND<0.0482	0.0868	0.482	ND<0.0482	115	0.415	0.0868	SA
	9/28/2008	0.203	0.0676	ND< 0.0483	ND< 0.0483	ND< 0.0483	ND< 0.0483	ND< 0.0483	ND< 0.0483	ND< 0.0483	ND< 0.0483	0.126	0.261	ND< 0.0483	94.7	0.300	0.126	SA
	3/26/2009	0.138	ND<0.0429	ND<0.0429	ND<0.0429	ND<0.0429	ND<0.0429	ND<0.0429	ND<0.0429	ND<0.0429	ND<0.0429	0.138	ND<0.0429	ND<0.0429	56.9	0.0984	0.0591	SA
	6/30/2009	0.191	0.0765	ND<0.0478	ND<0.0478	ND<0.0478	ND<0.0478	ND<0.0478	ND<0.0478	ND<0.0478	ND<0.0478	ND<0.0478	0.229	ND<0.0478	179	0.143	0.0478	SA
	9/29/2009	0.172	0.0858	ND<0.0477	ND<0.0477	ND<0.0477	ND<0.0477	ND<0.0477	ND<0.0477	ND<0.0477	ND<0.0477	ND<0.0477	0.210	ND<0.0477	145	0.0953	ND<0.0477	SA
	12/26/2009	0.282	0.126	ND<0.0523	ND<0.0523	ND<0.0523	ND<0.0523	ND<0.0523	ND<0.0523	ND<0.0523	ND<0.0523	ND<0.0523	0.366	ND<0.0523	200	0.209	ND<0.0523	SA
	3/30/2010	0.209	0.112	ND<0.0500	ND<0.0500	ND<0.0500	ND<0.0500	ND<0.0500	ND<0.0500	ND<0.0500	ND<0.0500	ND<0.0500	0.316	ND<0.0500	150	0.179	ND<0.0500	SA
	6/30/2010	0.165	0.0778	ND<0.0486	ND<0.0486	ND<0.0486	ND<0.0486	ND<0.0486	ND<0.0486	ND<0.0486	ND<0.0486	ND<0.0486	0.223	ND<0.0486	30.9	0.0973	ND<0.0486	SA
	9/28/2010	0.265	0.128	ND<0.0491	ND<0.0491	ND<0.0491	ND<0.0491	ND<0.0491	ND<0.0491	ND<0.0491	ND<0.0491	ND<0.0491	0.402	ND<0.0491	244	0.275	ND<0.0491	SA
Risk-Based Concentrations [2]																		
- Occ. Volatilization to Outdoor Air		>S	NE	>S	NV	NV	NV	NE	NV	NV	NV	NV	>S	NV	16,000	NE	NV	
- Occ. Vapor Intrusion Into buildings		>S	NE	>S	NV	NV	NV	NE	NV	NV	NV	NV	>S	NV	10,000	NE	NV	
- Groundwater in an Excavation		>S	NE	>S	9.1	0.53	>S	NE	>S	>S	0.21	>S	>S	>S	500	NE	>S	
Construction and Excavation Worker																		

ND not detected at or above the indicated laboratory reporting limit
SA Specialty Analytical
µg/L Micrograms per Liter

[1] DEQ Method 8270SIM
[2] Oregon Department of Environmental Quality (DEQ) Generic Risk Based Concentrations (RBCs) (DEQ, 2009).
NE A Risk-Based Concentration has not been determined for this constituent
NV This chemical is considered "nonvolatile" for purposes of the exposure calculation
>S This groundwater RBC exceeds the solubility limit. Groundwater concentrations in excess of S indicate that free product may be present. If solubility is not listed, data was not listed in Appendix D of the DEQ RBDM guidance document (DEQ, 2009).

HOOD Robert

From: HOOD Robert
Sent: Wednesday, October 13, 2010 10:17 AM
To: 'John Day'
Subject: Molalla Kwik Gas, 03-05-0461

Importance: High

John:

As noted yesterday, these reports are well overdue from when you promised even just last month (approximately 5 weeks ago). I am not sure why I am not receiving any communication back (unless for some reason you are incapacitated with things other than business-related). As I've noted, these reports should have been completed and submitted some time ago (2007 for the investigation report and all the quarterly reports since). As mentioned in my voice message yesterday, they should be submitted by today.

Respectfully,

Rob

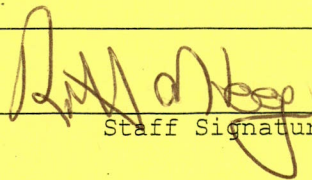
Rob Hood
Project Manager, UST Cleanup Program
Oregon Dept. of Environmental Quality
2020 SW 4th Ave., Ste. 400
Portland, OR 97201-4987
Ph: (503) 229-5617
Fax: (503) 229-6945
email: hood.robert@deq.state.or.us
website: www.oregon.gov/deq

UST CLEANUP TELEPHONE USE REPORT

CALL FROM/TO: John Day DATE: 10/12/2010
WITH: Consulbert TIME: 900
TELEPHONE NO: (503) 372-9760
REGARDING: Metalla Quirk Gas
FILE NO: 03 -05 -0461

SUMMARY OF CALL

Left voice message. Will do not have reports.
To me it appears no work has been
completed. Reports need to be submitted
today or tomorrow, or I will probably discuss
enforcement. Asked him to call


Staff Signature



Oregon

Theodore R. Kulongoski, Governor

file

Department of Environmental Quality

Northwest Region Portland Office

2020 SW 4th Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

Fax: (503) 229-6945

TTY: (503) 229-5471

17 August 2010

JASON POWELL
POWELL DISTRIBUTING
PO BOX 17160
PORTLAND OR 97217

Re: Molalla Kwik Gas
File No. 03-05-0461

Dear Mr. Powell:

Please refer to the attached message to your consultant John Day regarding completion of investigation work at the underground storage tank (UST) cleanup at 307 South Main Street in Molalla, Oregon. As noted, all reports should be submitted by **27 August 2010**. If you have any questions, please call me at (503) 229-5617.

Respectfully,

Robert A. Hood, Jr.
UST Cleanup Specialist

enclosure: 16 August 2010 electronic message to John Day.

cc: John Day
Environmental Compliance
Northwest
PO Box 230163
Portland, OR 97281

(rah:RAH)

HOOD Robert

From: HOOD Robert
Sent: Monday, August 16, 2010 3:45 PM
To: John Day
Subject: Molalla Kwik Gas, File 03-05-0461

John:

I received your voice message last week that you are out until the 18th. Not only will I need the investigation report from a few years ago (2007), I need separate monitoring reports for each quarterly event since then. Please submit all reports by **27 August 2010**. This notice is being sent to Mr. Powell to ensure as the responsible party he has been notified.

Rob

Rob Hood
Project Manager, UST Cleanup Program
Oregon Dept. of Environmental Quality
2020 SW 4th Ave., Ste. 400
Portland, OR 97201-4987
Ph: (503) 229-5617
Fax: (503) 229-6945
email: hood.robert@deq.state.or.us
website: www.oregon.gov/deq

UST CLEANUP TELEPHONE USE REPORT

CALL FROM/TO: John Day DATE: 10/30/09
WITH: Consultant TIME: Noon
TELEPHONE NO: () -
REGARDING: Report Submitted
FILE NO: CS -05 -0461

SUMMARY OF CALL

John indicated field work was completed (per our last conversations) that some figures/etc had gone to Washington. He started Report, things fell by the way side. Nonetheless, he requested an extension for Report Submitted to 30 November. Granted.

John indicated 4 MWS were installed & Quarterly Sampling had been completed except for 1 Quarter. I indicated also that separate Quarterly Reports are required for each event & not just a comprehensive Report. (I guess unless he wanted to include each one separately within the investigation/new install Report.

Phil Anthony
Staff Signature



Oregon

Theodore R. Kulongoski, Governor

file

Department of Environmental Quality

Northwest Region Portland Office

2020 SW 4th Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

Fax: (503) 229-6945

TTY: (503) 229-5471

21 October 2009

LEE POWELL JR
POWELL DISTRIBUTING
PO BOX 17160
PORTLAND OR 97217

Re: Molalla Kwik Gas
File No. 03-05-0461

Dear Mr. Powell:

The Department of Environmental Quality (DEQ) has not received any information regarding completion of investigation work at the underground storage tank (UST) cleanup at 305 West Main Street in Molalla, Oregon. In March 2008, your consultant, John Day indicated that a report from investigation activities was in draft. Please submit the report by **30 October 2009**. If you have any questions, please call me at (503) 229-5617.

Respectfully,

Robert A. Hood, Jr.
UST Cleanup Specialist

cc: John Day
Environmental Compliance
Northwest
PO Box 230163
Portland, OR 97281

Jason Powell
Powell Distribution Company
9125 N. Burrage
Portland, OR 97217

(rah:RAH)



UST CLEANUP TELEPHONE USE REPORT

CALL FROM/TO: John Day

DATE: 21 March 2008

WITH: Consident for Powell

TIME: 1545

TELEPHONE NO: 1503 372-9760

REGARDING: Reporting

FILE NO: 03 -05 -0461

SUMMARY OF CALL

John indicated work was completed & he is
finishing Report. Had someone else work on the
Report & he/she left, so submittal was delayed.
He ~~also~~ Anticipates it can be completed in mid-April,
so we agreed on the week of the 14th.

Robert A. [Signature]
Staff Signature

HOOD Robert

From: HOOD Robert
Sent: Tuesday, May 22, 2007 9:56 AM
To: 'John Day'
Subject: Molalla Kwik Gas Discussion, 03-05-0461

John:

From this morning and the follow-up voice message I left you.

I mapped the locations on a clean site plan, will fax over. One adjustment I could see is moving PB-1 to a location between PB-1 and the MW (high concentration). It seems that would tighten it up better.

From the temporary borings collect both soil and grab groundwater samples. For the soil samples, probably analyze a sample with the highest PID reading or at the soil/water interface (Gx, Dx, and RBDM VOCs./PAHs, if necessary). The water samples should be for Gx, Dx, appropriate RBDM VOCs, and PAHs if Dx is greater than 88 ppb). Since groundwater use has not been ruled out yet, please make sure detection or method reporting limits meet ingestion and inhalation from tap water risk-based screening levels.

Let me know if you have comments/questions. Thanks.

Rob

Robert A. Hood, Jr.
Natural Resource Specialist 4
DEQ, Northwest Region
2020 SW 4th Ave, Ste. 400
Portland, OR 97201-4987
Phone: 503.229.5617
Fax: 503.229.6945

FAX COVER SHEET

TO: John Day

OFFICE _____

PHONE: _____

FAX: 503 213 9980

DATE: _____

FROM: Rob Hood

OFFICE: _____

PHONE: 229 5617

RETURN FAX: (503) 229-6945

Number of pages (including this cover sheet): 3

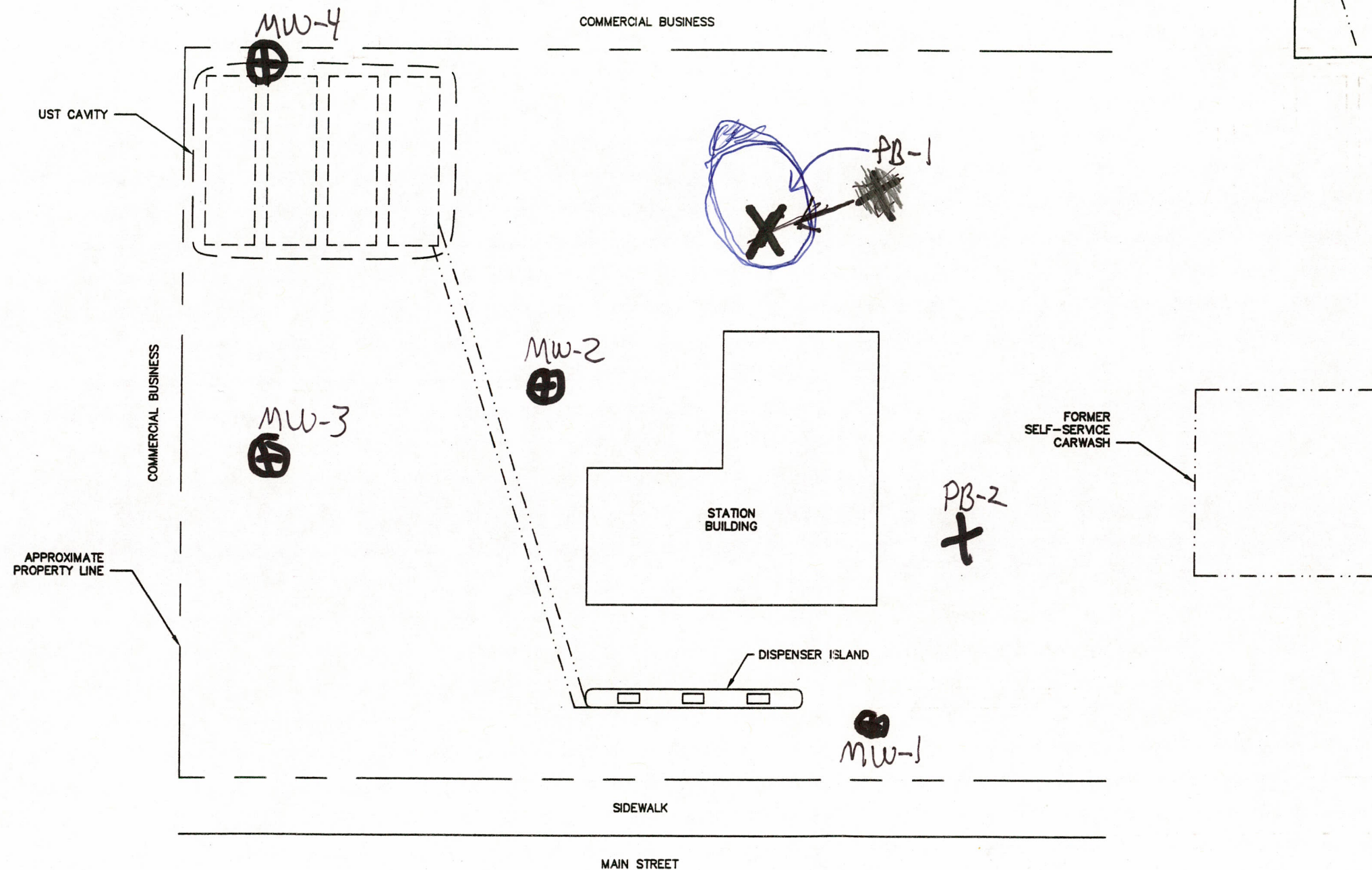
Comments:

~~At~~ MW + Boring adjustments.
Also, see my email to you.



State of Oregon
Department of
Environmental
Quality

Northwest Region
Office
2020 SW 4th Avenue
Suite 400
Portland, OR 97201
Phone: 503 229-5263



LEGEND

UST

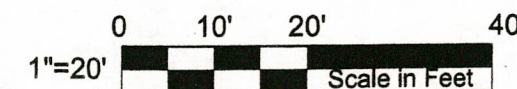
Underground Storage Tank

[Dashed Box]

Former Underground Storage Tank

[Dashed Line]

Former Underground Product Piping Trench



**ENVIRONMENTAL
COMPLIANCE
NORTHWEST, INC.**

SITE PLAN

KWIK GAS
305 WEST MAIN STREET
MOLALLA, OREGON

Project No. 05-106

FIGURE 2

FAX COVER SHEET



State of Oregon
Department of
Environmental
Quality

Northwest Region
Office
2020 SW 4th Avenue
Suite 400
Portland, OR 97201
Phone: 503 229-5263

TO: John Day
OFFICE: _____
PHONE: _____
FAX: 503 213 9980
DATE: 21 May 2007

FROM: Rob Hood
OFFICE: _____
PHONE: 229 5617

RETURN FAX: (503) 229-6945

Number of pages (including this cover sheet): 3

Malala Kwik Guy
OR 05 0461

Comments:

*Per my voice message let's discuss the
intended approach & the additional
boring & monitoring well locations.
(3) (2)*

Rob.

03 05 0461

Molalla Kwik Gas

LEGEND

UST

Underground Storage Tank



Former Underground Storage Tank



Former Underground Product
Piping Trench

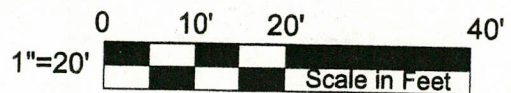
Boring (in attempt to
define extent)

FORMER
SELF-SERVICE
CARWASH

+ Boring

(In attempt to
define extent)

ND
MW



**ENVIRONMENTAL
COMPLIANCE
NORTHWEST, INC.**

SITE PLAN

KWIK GAS
305 WEST MAIN STREET
MOLALLA, OREGON

Project No. 05-106

FIGURE 2

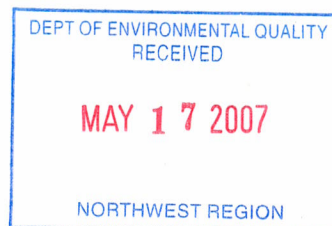
ENVIRONMENTAL COMPLIANCE NORTHWEST

May 16, 2007
Project No. 05-106

Mr. Rob Hood
Oregon Department of Environmental Quality
Northwest Region
2020 SW Fourth Avenue, Suite 400
Portland, Oregon 97201

**Subject: Work Plan
Additional Site Assessment and
Monitoring Well Installation
Former Molalla Kwik Gas
305 West Main Street
Molalla, Oregon**

DEQ File No. 03-05-0461



Dear Mr. Hood:

Environmental Compliance Northwest, Inc., (ECNW) has prepared this work plan to conduct additional site assessment and groundwater monitoring well installation activities at the subject site. This work plan addresses the Oregon Department of Environmental Quality's (DEQ's) request to further characterize impacts to soil and groundwater at the site associated with a historic petroleum hydrocarbon release (letter dated May 1, 2007). Following is a brief description of site activities previously conducted and the proposed scope of services to meet the project objectives.

BACKGROUND

The following background information was obtained from DEQ files, verbal discussions with Powell Distributing Company (Powell) personnel, and previous site activities. The facility has operated since at least 1977 and consisted of a retail fueling and automotive repair facility. The UST system consisted of four USTs (three gasoline and one diesel), located in the northwest corner of the site and one fuel dispenser island, located in the southern portion of the site (Figure 2).

In April 2005, an apparent leak was detected in the underground product piping. A portion of the piping was uncovered and several small holes were observed in the piping.

ECNW conducted site assessment activities between March and April 2005. Initial activities included drilling soil borings adjacent to underground product piping using hand auger

equipment. Based on results of the initial sampling, the apparent most highly impacted soil associated with the product piping leak was excavated and additional soil samples were analyzed. Laboratory results indicated that residual gasoline- and diesel-range hydrocarbons remain beneath the site.

In April 2005, a total of nine soil borings were drilled to further assess petroleum hydrocarbon impact beneath the site. Seven borings were advanced in the vicinity of the underground product piping trench and two borings were advanced in the southern portion of the site, near the fuel dispenser island. Soil samples from each boring and grab groundwater samples from four borings were collected and analyzed for petroleum hydrocarbons. Analytical results of several soil and grab groundwater samples indicated that residual gasoline- and diesel-range hydrocarbons are present beneath the site, exceeding one or more preliminary DEQ risk-based decision making (RBDM) cleanup levels for the exposure pathways considered to be potentially complete at the site (ECNW, 2007).

In October 2006, the four USTs at the site were decommissioned by removal. A limited quantity of apparent petroleum hydrocarbon-impacted backfill material was encountered and excavated during decommissioning activities. Analytical results of soil samples collected from the excavation bottom, in the southeastern portion of the tank cavity, indicated relatively low concentrations of gasoline- and diesel-range hydrocarbons. Soil samples were also collected during UST decommissioning activities from beneath the three former fuel dispensers. Elevated diesel-range and relatively low gasoline-range hydrocarbons were detected in the soil samples collected from beneath the former fuel dispensers.

PROPOSED SCOPE OF WORK

Based on the results of the site assessment activities in 2005, UST decommissioning conducted in October 2006, and the above-referenced DEQ letter dated May 1, 2007, we propose additional assessment activities consisting of installation of a total of four groundwater monitoring wells at the site.

Based on information from DEQ files from an adjacent property (Buckaroo Ford), shallow groundwater in the site vicinity flows toward the west-northwest. In addition, based on previous site assessment activities conducted onsite, the shallow water-bearing zone is anticipated to be encountered at depths ranging from approximately 8 to 13 feet bgs.

One monitoring well is proposed in the southern portion of the site, near the east end of the former fuel dispenser island (hydraulically up-gradient). The remaining three monitoring wells

are proposed in the west and northwest portions of the site, hydraulically down-gradient and cross-gradient of the former onsite source(s). The proposed monitoring well locations are shown on Figure 2.

DRILLING AND SOIL SAMPLING

Prior to intrusive field activities, the Utility Notification Center will be contacted to locate underground utilities adjacent to the subject site.

Based on the anticipated drilling conditions, drilling will be conducted using hollow-stem auger drilling technology. Each well bore will be logged in the field by an Oregon-Registered Geologist. Soil will be continuously sampled during drilling. Olfactory and visual indications of impact will be observed and noted. The sample with the highest indication of impact from each boring will be submitted for laboratory analysis. If evidence of impact is not observed, the soil sample collected from approximately the soil/shallow groundwater interface will be analyzed. The soil samples will be placed in laboratory-supplied containers, labeled, stored in an ice-filled cooler, and transported to an analytical laboratory following chain-of-custody protocols.

The wells will be constructed of 2-inch diameter PVC and completed to a depth of approximately 20 feet below the ground surface (bgs), and screened from approximately 5 to 20 feet bgs. Following installation, each well will be developed until relatively sediment-free.

If drilling refusal is encountered, field activities will be stopped and use of alternative drilling technologies will be considered. The top of casing elevations of the newly installed monitoring wells will be surveyed relative to an arbitrary benchmark.

GROUNDWATER MONITORING

Groundwater samples will be collected from each of the monitoring wells. Before sampling, water level measurements will be recorded, and the presence of light non-aqueous phase liquid (LNAPL) will be assessed. If LNAPL is not present, each well will then be purged of groundwater to obtain a water sample that is representative of the groundwater in the shallow water-bearing zone. The monitoring wells will be purged using a bailer or a pump to avoid agitating the water or exposing it to air. Purging will continue until a minimum of three well casing volumes have been evacuated. The samples will be placed in an iced cooler and transported to an analytical laboratory following chain-of-custody protocols.

ANALYTICAL PROGRAM

Based on previously completed work at the site, soil samples will be analyzed for gasoline- and diesel-range hydrocarbons. Soil samples with detectable concentrations of gasoline will be analyzed for the DEQ RBDM volatile organic compounds (VOCs) contained in the September 2003 RBDM guidance document. The soil sample with the highest concentration of diesel will be additionally analyzed for polynuclear aromatic hydrocarbons (PAHs).

In accordance with DEQ requirements, each groundwater sample will be analyzed for gasoline- and diesel-range hydrocarbons and as well as benzene, toluene, ethylbenzene, and total xylenes (BTEX). The groundwater sample with the highest BTEX concentrations will be analyzed for DEQ RBDM VOCs. Samples with diesel concentrations of at least 500 micrograms per liter will also be analyzed for PAHs.

INVESTIGATION DERIVED WASTE MANAGEMENT

Soil, decontamination rinsate, and purge water generated during investigation activities will be stored in drums onsite pending laboratory results. If analytical results indicate the presence of petroleum hydrocarbons, soil will be transported to an appropriate landfill for disposal. Purged water from sampling and decontamination rinsate will be transported to an approved facility for treatment and disposal.

ADDITIONAL SITE ASSESSMENT REPORT

Following receipt of the analytical results, ECNW will prepare a report presenting the finding and conclusions of the additional site assessment. The report will include tabulated analytical results, site plan showing well locations, groundwater gradient and contaminant data maps, and boring logs with well construction details. The report will also include a preliminary risk-based evaluation of potentially complete exposure pathways. The report will be submitted within four weeks of receipt of the laboratory report.

SCHEDULE

We are prepared to commence work as soon as practical after receiving the notice to proceed. The field work has tentatively been scheduled for the last week of May 2007.

CLOSING

We appreciate your assistance on this project. Should you require additional information or have questions regarding this project, please contact us at (503) 372-9760.

Sincerely,

ENVIRONMENTAL COMPLIANCE NORTHWEST, INC.



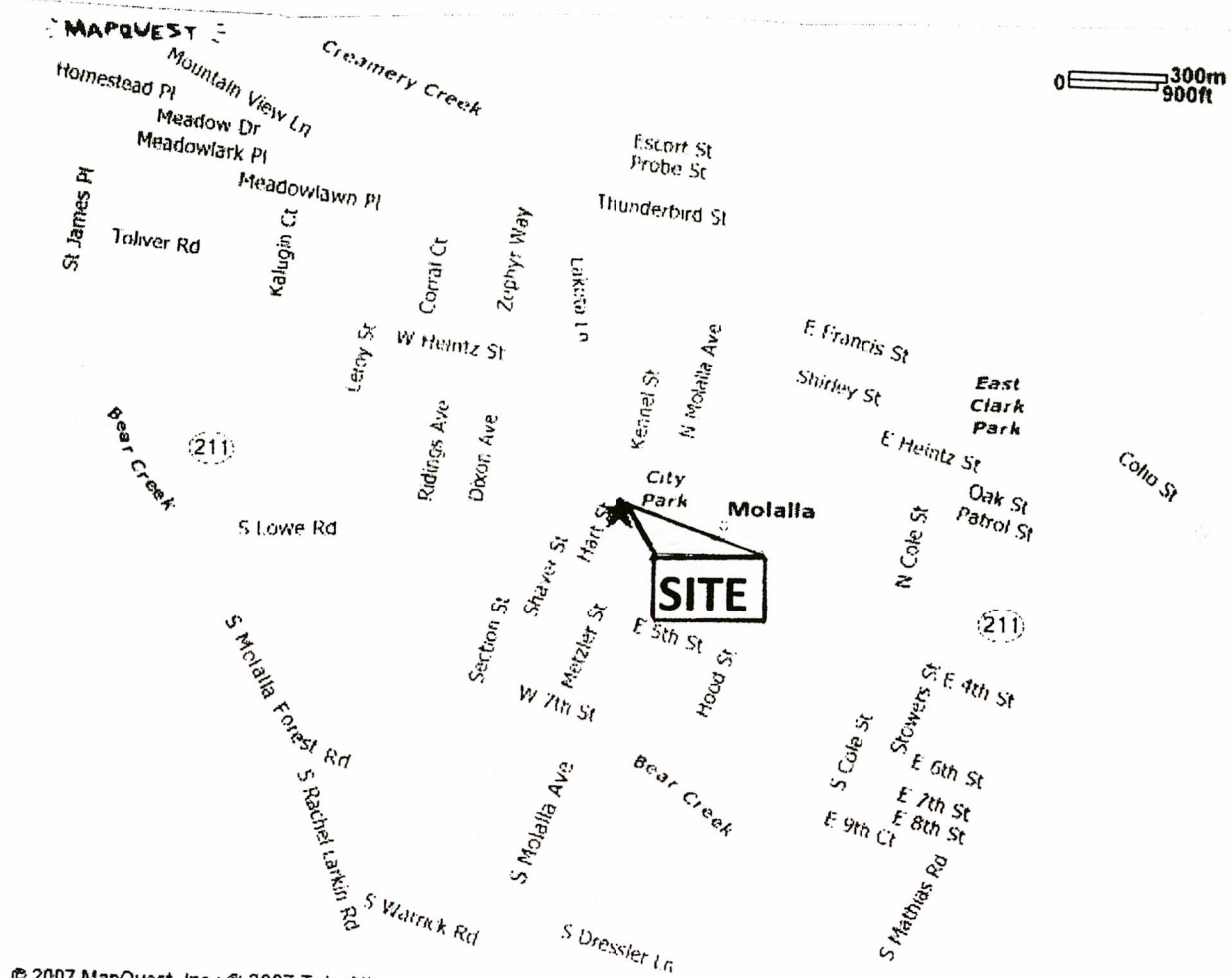
John M. Day, R.G.

Senior Geologist/President

Attachments: Figure 1 – Vicinity Map

Figure 2 – Site Plan and Proposed Monitoring Well Locations

cc: Jason Powell-Powell Distributing



VICINITY MAP

MOLALLA KWIK GAS
305 WEST MAIN STREET
MOLALLA, OREGON

ECNW PROJ. No. 05-106

FIGURE 1



Oregon

Theodore R. Kulongoski, Governor

Department of Environmental Quality

Northwest Region Portland Office

2020 SW 4th Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

FAX (503) 229-6945

TTY (503) 229-5471

1 May 2007

LEE POWELL JR
POWELL DISTRIBUTING
PO BOX 17160
PORTLAND OR 97217

Re: Molalla Kwik Gas
File No. 03-05-0461

Dear Mr. Powell:

The Department of Environmental Quality (DEQ) has reviewed the report entitled, *Site Assessment and UST Decommissioning Report*, dated 17 April 2007, regarding the underground storage tank (UST) cleanup at 305 West Main Street in Molalla, Oregon. DEQ has the following comments:

-Please submit a work plan for proposed additional borings and monitoring wells and include work timelines. Please coordinate with me so I may consider a site visit.

-Please show the excavation limits at the piping area.

-Please identify which samples remain in-place compared to over-excavated soil.

-Note the following on tabulation and figures:

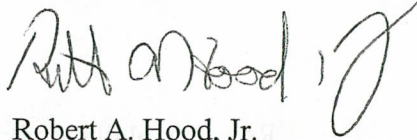
S1-8.5', xylenes should be 113 parts per million (ppm).

T2-S-13.5', ethylbenzene should be 0.189 ppm, xylenes 0.0503 ppm PL-1-5', toluene should be 664 ppm (Figure 3 only).

Molalla Kwik Gas
File No: 03-05-0461
1 May 2007
Page 2 of 2

Please provide the above-requested information by **25 May 2007**. If you have any questions, please call me at (503) 229-5617.

Respectfully,



Robert A. Hood, Jr.
UST Cleanup Specialist

cc: John Day
Environmental Compliance
Northwest
PO Box 230163
Portland, OR 97281

Jason Powell
Powell Distribution Company
9125 N. Burrage
Portland, OR 97217

(rah:RAH)

ENVIRONMENTAL COMPLIANCE NORTHWEST

TRANSMITTAL

Date: April 17, 2007

File: 05-106

TO:

Mr. Rob Hood

Oregon DEQ, NW Region

2020 SW Fourth Avenue, Suite 400

Portland, OR 97201

DEPT OF ENVIRONMENTAL QUALITY
RECEIVED

APR 20 2007

NORTHWEST REGION

Subject

Site Assessment and UST

Decommissioning Report

Molalla Kwik Gas

305 West Main Street

Molalla, Oregon

DEQ LUST File No.: 03-05-461

We are sending the following:

One copy of the above-referenced report.

Remarks:

If you have any questions, please contact our office at (503) 372-9760.

Thank you.

By:



John M. Day, R.G.

Senior Geologist

President

HOOD Robert

From: John Day [jday@dayenv.com]
Sent: Monday, February 26, 2007 10:54 AM
To: HOOD Robert
Subject: RE: Molalla Qwik Gas, Leaking UST No: 03-05-0461

Rob, thanks for the email. I apologize for the delay. I am actually working on the report today. The finalized report will be to you within two weeks (no later than March 12, 2007), likely sooner.

Please call or email me if you have more questions.

Thanks,
John Day

-----Original Message-----

From: HOOD Robert [mailto:HOOD.Robert@deq.state.or.us]
Sent: Monday, February 26, 2007 10:43 AM
To: Jday@dayenv.com
Subject: Molalla Qwik Gas, Leaking UST No: 03-05-0461

John: I have not received a report that was due 13 November 2006. What's your status?
Thanks.

Rob

HOOD Robert

From: HOOD Robert
Sent: Wednesday, October 11, 2006 3:47 PM
To: 'jday@dayenv.com'
Subject: Molalla Kwik Gas Report Extension 03-05-0461

John: This is to confirm our conversation today. You indicated that site assessment work was completed prior to the decommissioning work, which occurred in the last couple of weeks. The decommissioning paper work will be submitted shortly (after receiving analytical results). Also, a more formal report will be submitted regarding the earlier site assessment work and decommissioning activities due by Monday 13 November 2006. Please inform Mr. Powell of the new timeline. If you have any questions or comments, let me know.

Rob

Robert A. Hood, Jr.
Natural Resource Specialist 4
DEQ, Northwest Region
2020 SW 4th Ave, Ste. 400
Portland, OR 97201-4987
Phone: 503.229.5617
Fax: 503.229.6945

FAX COVER SHEET

TO: John Day

PO Box 23063
Portland 97281
jday@dayenv.com

OFFICE _____

PHONE: _____

FAX: 503 213 9980

DATE: 10/11/06

FROM: Rob Hood

OFFICE: _____

PHONE: 503 229 5617

RETURN FAX: (503) 229-6945

Number of pages (including this cover sheet): 2

Comments:

McAllister Kwik Gas.



State of Oregon
Department of
Environmental
Quality

Northwest Region
Office
2020 SW 4th Avenue
Suite 400
Portland, OR 97201
Phone: 503 229-5263

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POWELL DISTRIBUTING
P. O. BOX 17160
PORTLAND, OREGON 97217**

PH

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Street, Apt. No.; or PO Box No.

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7099 3220 0000 9092 5975

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- Certified Mail is not available for any class of international mail.
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- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.



Oregon

Theodore R. Kulongoski, Governor

Department of Environmental Quality

Northwest Region Portland Office

2020 SW 4th Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

FAX (503) 229-6945

TTY (503) 229-5471

Certified Mail

Return Receipt Requested

7099 3220 0000 9092 5975

2 October 2006

LEE POWELL JR
POWELL DISTRIBUTING
PO BOX 17160
PORTLAND OR 97217

Re: Molalla Kwik Gas
File No. 03-05-0461

Dear Mr. Powell:

To date, your site assessment report has not been submitted to the Department of Environmental Quality as requested in a letter dated 24 January 2006. Please submit the report(s) by **11 October 2006**. If you have any questions, please call me at (503) 229-5617.

Respectfully,

Robert A. Hood, Jr.
UST Cleanup Specialist

cc: Kleinfelder, Inc.
15050 SW Koll Pkwy.
Beaverton, OR 97006-6028

(rah:RAH)



Oregon

Theodore R. Kulongoski, Governor

file

Department of Environmental Quality

Northwest Region Portland Office

2020 SW 4th Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

FAX (503) 229-6945

TTY (503) 229-5471

24 January 2006

LEE POWELL JR
POWELL DISTRIBUTING
PO BOX 17160
PORTLAND OR 97217

Re: Molalla Kwik Gas
File No. 03-05-0461

Dear Mr. Powell:

I have been assigned project manager for your underground storage tank (UST) cleanup at 307 South Main in Molalla, Oregon. To date, a site assessment report has not been submitted to the Department of Environmental Quality. Please submit the report(s) by **3 February 2006**.

If you have any questions, please call me at (503) 229-5617.

Respectfully,

Robert A. Hood, Jr.
UST Cleanup Specialist

cc: John Day
Kleinfelder, Inc.
15050 SW Koll Pkwy.
Beaverton, OR 97006-6028

(rah:RAH)

09/14/2005 14:40 50373

5032139980

PAGE 01

P. 2

SEP 14 2005 15:17

03-05-0461

6024

Oregon Department of Environmental Quality
GENERAL PERMIT REGISTRATION FORM AND
30-DAY NOTICE OF INTENT TO DECOMMISSION USTs OR COMPLETE A CHANGE-IN-SERVICE

1. FACILITY (Location of Tanks) (Please Print) **2. PERMITTEE (Please Print)**

Name: Molalla Kwik Gas Name: Powell Distribution
 Address: 307 S. Main Address: 9125 N. Burrage
Molalla, OR 97038 Portland, OR 97217
 Phone: N/A Phone: 503-289-5558
 DEQ General Permit Operating Certificate Number: _____
 Work To Be Performed By: new tank lining & repair License # 26252
 (Permittee, Tank Owner, Property Owner or Licensed Service Provider) (Service Provider)
 Phone: 503-705-2926 Mobile Phone: _____

THIS FORM MUST BE SUBMITTED BY UST PERMITTEE 30 DAYS BEFORE START OF WORK
YOU MUST CONTACT YOUR LOCAL DEQ REGIONAL OFFICE 3-DAYS BEFORE STARTING ANY
DECOMMISSIONING WORK. (Phone numbers are listed on Page 2)

Will tank removal or potential cleanup affect adjacent property or Right-of-Way property? Yes _____ No X
 Date decommissioning is scheduled to begin: 10/4/05

TANK ID #	DEQ-UST PERMIT #	TANK SIZE IN GALLONS	PRODUCT: GASOLINE, DIESEL, USED OIL, OTHER?		CLOSURE OR CHANGE-IN-SERVICE?			TANK TO BE REMOVED?	
			PRESENT	NEW	TANK REMOVAL	CLOSURE IN PLACE	CHANGE IN SERVICE	YES	NO
ABEED		10,000	Gas		X				X
ABFEE		10,000	Picard		X				X
ABDEF		10,510	Gas		X				X
ABEEG		10,000	Gas		X				X

- * If decommissioned tank(s) are to be replaced by new aboveground storage tanks you must submit a General Permit Registration Form to Install and Operate USTs for the new tanks 30 days before installing them.
- * Submit a soil sampling plan to the DEQ regional office and receive plan approval prior to starting work if (1) tank is to be decommissioned in-place, (2) tank contents are changed to an unregulated substance, (3) tank contains a regulated substance other than petroleum, or (4) tank is changed to an unregulated use.

Permittee: Jason Powell Date: 9/14/05
 (Please Print)
 Permittee: Jason Powell (Signature)

June 2005

RECEIVED

DEQ-05-LQ-0120

SEP 14 2005

DEQ - SALEM OFFICE

PO Box 230163
Portland, OR 97281
(503) 372-9760 - Phone
(503) 213-9980 - Fax

6024
**ENVIRONMENTAL
COMPLIANCE
NORTHWEST, INC.**

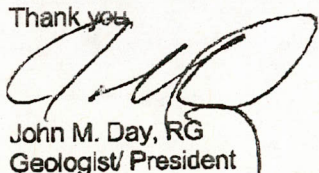
Fax

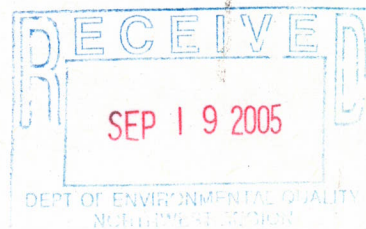
To: Duty Officer **From:** John Day
Company: Oregon DEQ-Western Region **Pages:** 2
Fax: 503-373-7944 **Date:** 9/15/05
Re: 30-Day Notice **CC:**

☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Reconcile

• **Comments:** On behalf of Powell Distributing, the following 30-Day Notice of Intent to Decommission USTs is submitted for your review. Please contact John Day at 503-372-9760 if you have questions or need additional information.

Thank you,


John M. Day, RG
Geologist/ President



UST CLEANUP TELEPHONE USE REPORT

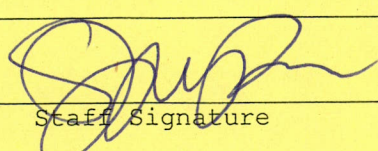
CALL FROM/TO: John Day DATE: 4/13/05
WITH: _____ TIME: 8:10 am
TELEPHONE NO: (503) 372-9760
REGARDING: GW impacts
FILE NO: 03-05-0461

SUMMARY OF CALL

GW was encountered at 6.5' bgs and obviously contaminated; sheen and odor. GW samples have not yet been collected.

At a minimum piping will be replaced. A complete site assessment will be conducted prior to digging.

John stated county has address as 305 W Main in Molalla and our records show the address to be 307 S Main in Molalla. Also John believes the UST sizes are 5000 gallons not 10,000 gallons. John will look into these discrepancies and contact Steve Paiko (HQ-UST) to straighten out any issues.


Staff Signature



Oregon

Theodore Kulongoski, Governor

Department of Environmental Quality

Northwest Region Portland Office

2020 SW 4th Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

FAX (503) 229-6945

TTY (503) 229-5471

March 17, 2005

LEE POWELL JR
POWELL DISTRIBUTING CO INC
PO BOX 17160
PORTLAND OR 97217

RE: UST piping failure
Facility ID No.: 6024

*03 05 0461
Molalla Qwik Gas*

Dear Mr. Powell:

On March 15, 2005, the Oregon Department of Environmental Quality (DEQ) performed a piping inspection of the underground storage tank (UST) system at your facility located at 307 S MAIN in Molalla, Oregon.

During the inspection, pressurized product piping was found that exhibited visible corrosion, several holes, and severe pitting. The piping failure was caused by corrosion and resulted in a confirmed release of gasoline.

Following a release of petroleum from a UST system, responsible parties are required by Oregon Administrative Rules 340-122-201 through 340-122-360 to perform initial response, initial abatement measures, initial site characterization, and investigation for the magnitude and extent of contamination, to be followed by remediation. The DEQ has found that often the quickest, safest, and most cost efficient way to achieve cleanup is to act quickly.

Therefore, the DEQ requests that Powell Distributing take action at once by contacting and hiring a qualified contractor or consultant to assist you in evaluating and cleaning up the site now while the piping trench is still open. A DEQ project manager (Rob Hood) has been assigned to assist you in reaching remediation goals and achieving site closure. If you have questions concerning the cleanup, Mr. Hood can be reached at 503-229-5617.

The product piping at this facility is single wall steel and according to DEQ records, was installed without corrosion protection in 1977. The piping was retrofitted with an impressed current cathodic protection system in December of 1998. In 2002 following an inspection by the DEQ and subsequent testing, the cathodic protection system was documented as being insufficient in protecting the UST system including the piping.

The ability of the cathodic protection system to protect as well as the remaining service life of the single wall product piping is in question, and both must be extensively examined. Please contact a licensed and NACE certified cathodic protection expert, and determine why the cathodic protection system allowed the piping to corrode and to fail.

Demonstrating compliance with all related UST requirements in rule, standard, manufacturer's specifications, and codes that apply to the cathodic protection system and the failing piping at this facility will be an expensive and time consuming undertaking, and the DEQ does not believe that the existing piping will hold up to such rigorous examination.

After briefly speaking with Mr. Jason Powell today, I understand that Powell Distributing would like to continue to keep the site open as an operating fueling station.

The DEQ requests that Powell Distributing take the following steps to address the issues surrounding the failed piping and to bring the UST system safely back into operation.

- Cease dispensing product at once and contact this office about placing the UST systems into temporary closure. An application for temporary closure is enclosed.
- Check with the City and the local fire authority to see if they have any permitting, inspection, or other regulatory requirements before proceeding.

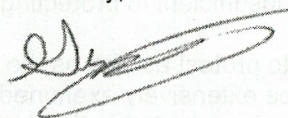
- Provide the DEQ with written 30-day notice for modification of the product piping. A copy of the notice form is enclosed.
- Provide the DEQ with verbal 72-hr notice prior to modification of the piping and proceed with piping modifications after receiving the 72-hr confirmation number and scheduling a date and time for the DEQ to inspect. It may be necessary to schedule and coordinate more than one inspection.
- Remove all the single wall steel product piping and upon completion, collect soil samples from under the former piping runs. Samples must be collected beginning at the dispensers and every 20 feet all the way to the USTs, from where contamination is found to be, or as directed by Mr. Hood.
- Install new corrosion resistant UL approved product piping, have the lines pneumatically tested and then hydrostatically according to standard and rule, and report the results of each passing or failing hydrostatic test to the DEQ.
- When the lines are tight and all tests are passing, submit the DEQ's retrofit checklist and copies of passing line tests.
- Resume operation after receiving a new operating certificate from the DEQ.

Additional items to include with the retrofit checklist would be:

- Sampling data, map, chain of custody, and lab results for the former piping run sampling events.
- Documentation showing the type of piping installed.
- Photos to assist with future UST inspections.

I may be reached at 503-229-5496 to record 72-hr notice, schedule inspections or to answer any questions you may have.

Sincerely,



Gregory Toran
Environmental Specialist

cc: Rob Hood DEQ-NWR

enclosures



Oregon

Theodore Kulongoski, Governor

Department of Environmental Quality

Northwest Region Portland Office

2020 SW 4th Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

FAX (503) 229-6945

TTY (503) 229-5471

March 17, 2005

03 05 0461

LEE POWELL JR
POWELL DISTRIBUTING CO INC
PO BOX 17160
PORTLAND OR 97217

RE: UST Compliance Inspection
Facility ID No.: 6024

Dear Mr. Powell:

The purpose of this letter is to inform you that the Oregon Department of Environmental Quality (DEQ) would like to schedule an underground storage tank (UST) inspection at your facility located at 307 S MAIN in Molalla, Oregon. DEQ commonly conducts full compliance inspections of UST systems following a confirmed release of petroleum.

A thorough inspection at your facility will be conducted to determine compliance with all State UST requirements. These requirements include release detection, spill and overfill prevention, corrosion protection, release detection, financial responsibility, operator training, equipment operation, maintenance, recordkeeping, and repair procedures. The inspection is not being conducted as technical assistance and items found not to be in compliance with UST rules will result in enforcement action against the permittee and tank owner.

Please have all UST related records available for review including the following:

- Product line and leak detector test results for 2004.
- The last twelve months of inventory control records and the last tank tightness test for each tank.
- The last twelve months of tank leak detection records for any additional leak detection methods being performed.
- Documentation showing the financial responsibility mechanism currently in place.
- Documentation from Tank Liners in 1998 showing results of the assessment of the steel tanks and completion of the tank lining according to standard, rule and code.
- Documentation from 1998 showing the field installed cathodic protection system was designed by an expert, as "expert" is defined in rule.
- Documentation from 1998 and 2002 showing the cathodic protection system design specifications and design drawings.
- Documentation from 1998 and 2002 showing that the cathodic protection system was installed in 1998 and repaired in 2002 according to standard, rule and code.
- Documentation showing what caused the cathodic protection system to fail during or before 2002 and what caused the corrosion of the steel piping that failed in 2005.
- Documentation showing the last three 60-day inspections or system checks noted for the cathodic system.

- Copies of the last two, three-year cathodic protection tests.
- Copies of any repair or modification records on file.
- Documentation showing who provided operator training and the training date.

The inspection evaluation will also include:

- Review of the equipment installed including the product piping.
- Confirmation of a functional overfill prevention device for each tank. Be prepared to demonstrate functionality during the inspection.
- Confirmation of a functional cathodic protection system that has been properly designed, installed, evaluated, and repaired and is currently protecting the UST system according to standard, rule and code. Please contact a licensed and NACE certified cathodic protection expert to test, make design corrections, and repair as necessary.

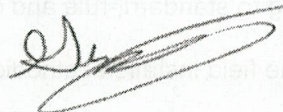
The inspection could take up to five hours to complete. Please call me by **March 23, 2005** to schedule the inspection at your facility. The guidance document "How to Prepare for an UST Compliance Inspection" has been enclosed to assist you in preparation for your inspection.

DEQ suggests that you hire a professional UST maintenance company to be there during the inspection providing sump access, verifying operation of overfill protection, testing sensors and tank monitors, pulling drop tubes, printing monitoring and test reports, or to answer specific technical questions regarding your systems.

You may also want to have your UST maintenance company inspect and review equipment and records and to verify compliance with UST rules, prior to the inspection date. As a reminder, the inspection is not being conducted as technical assistance and items found not to be in compliance with UST rules will result in enforcement action against the permittee and tank owner.

I may be reached at 503-229-5496 to schedule the inspection or to answer any questions you may have.

Sincerely,



Gregory Toran
Environmental Specialist

cc: Rob Hood DEQ-NWR

enclosures

State of Oregon
Department of Environmental Quality

Memorandum

To: UST compliance files 6024
Filename Molalla Kwik gas

Date: March 15, 2005

03 05 0461

From: Greg Toran ODEQ-NWR

Subject: Piping inspection

Inspection date: March 15, 2005

Inspection site conditions: Clear

Others onsite: Ray McCall with SME Corp and Keith Iding with DEQ-NWR.

Reason for the inspection: Responding to piping failure.

Basic site information: Retail service station in area zoned for business use.

Records reviewed prior to the inspection: None

Records reviewed or collected during the inspection: Cathodic system site check logs.

Inspection findings equipment:

Only the single wall steel product piping was evaluated on this date. At least one run of piping is corroded to the point of failure; it has several corrosion holes and deep pitting. According to Ray McCall, SME received a call on the 9th of March 2005 about one product not properly dispensing.

Ray said the dispenser for super was found to be in slow flow mode and initially a new leak detector was installed. The problem continued after replacement of the leak detector and the product line then failed a hydrostatic test. After performing a locate to identify the steel product lines, possible cathodic cables, utilities, and electrical conduit, SME introduced helium into the failed line and working from the dispenser found the area of the failed product line approximately 12 feet past the front of the building and 11 feet away from the side of the building. (see site map and photos)

The product lines were then exposed by trenching and following examination several holes were found in the super gasoline line. A 20 foot section of the steel product piping was removed and replacement of the piping was underway as DEQ arrived.

I asked SME to stop the installation activities at once. The cathodic protection system may have failed and will require evaluation; the other product lines are also in question. The tank owner will be contacted and a full evaluation of the entire UST system will be scheduled.

Inspection findings operational:

Not evaluated for operational issues.

Records or test results requested and due date:

None today, sending letter to tank owner requesting records as part of full SOC inspection.

Current operational status:

Operating today and I requested system be taken out of service.

TA provided & recommendations to Owner, Operator, or Permittee:

I spoke with Jason Powell (trained operator) by phone today, and requested the UST system be taken out of service and site evaluation begun while the product piping trench is open. Jason said he is going to get two bids for replacement of all the piping and he agreed to begin sampling at the point of the release after taking the UST system out of service.

Other comments:

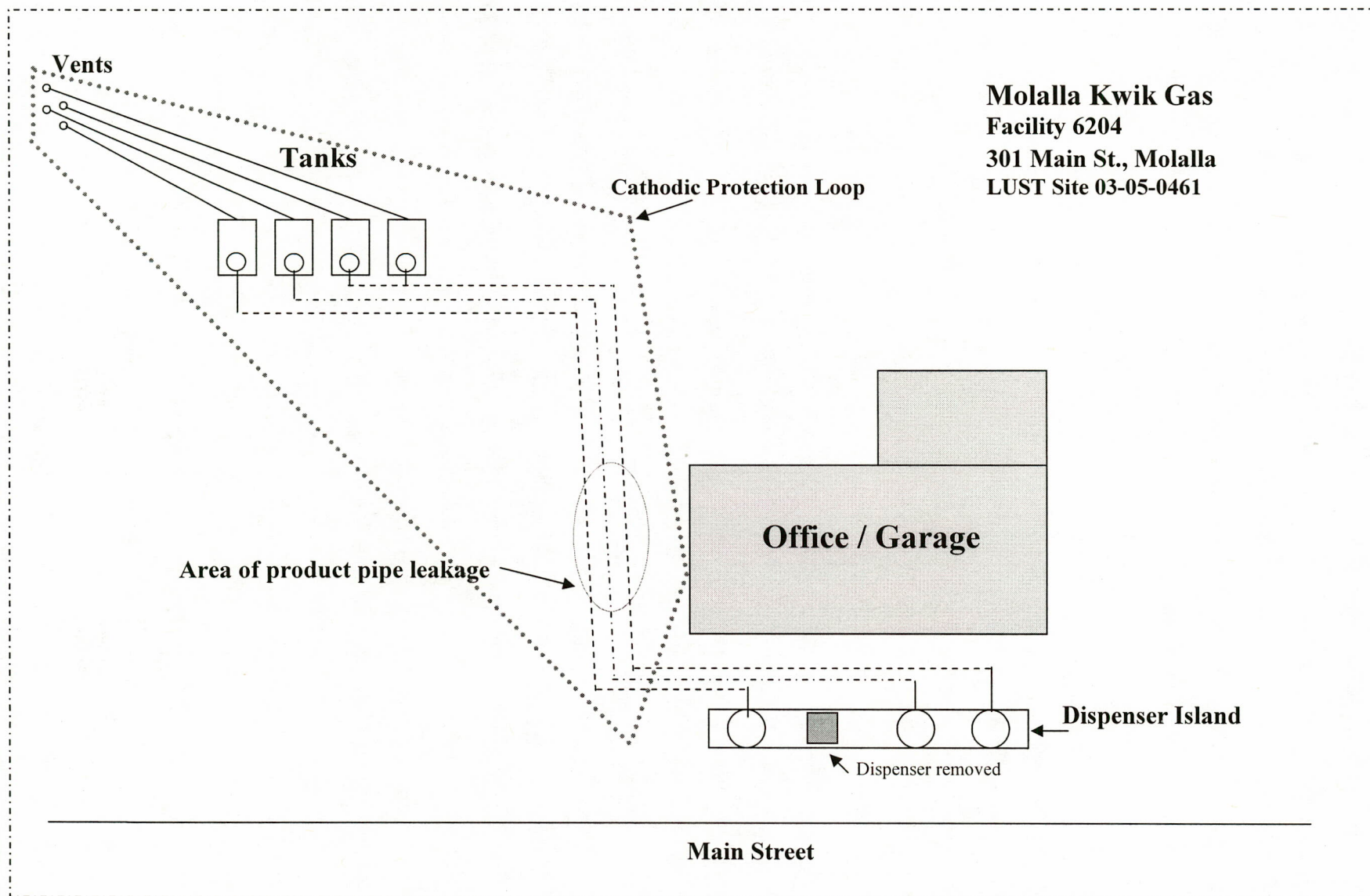
There was a small covered pile of contaminated materials that will need to go offsite for disposal; it can be seen in the file photos. Digital photos are stored in UST share folder for facility 6024 on the NWR server.

Conclusion:

This site should not operate until further evaluated and deemed safe. End of this initial piping inspection.

↑
North

**Molalla Kwik Gas
Facility 6204
301 Main St., Molalla
LUST Site 03-05-0461**





Point of identified piping failure

Mar 15, 2005 15:27

6024 Piping failure inspection

MAR 15 2005

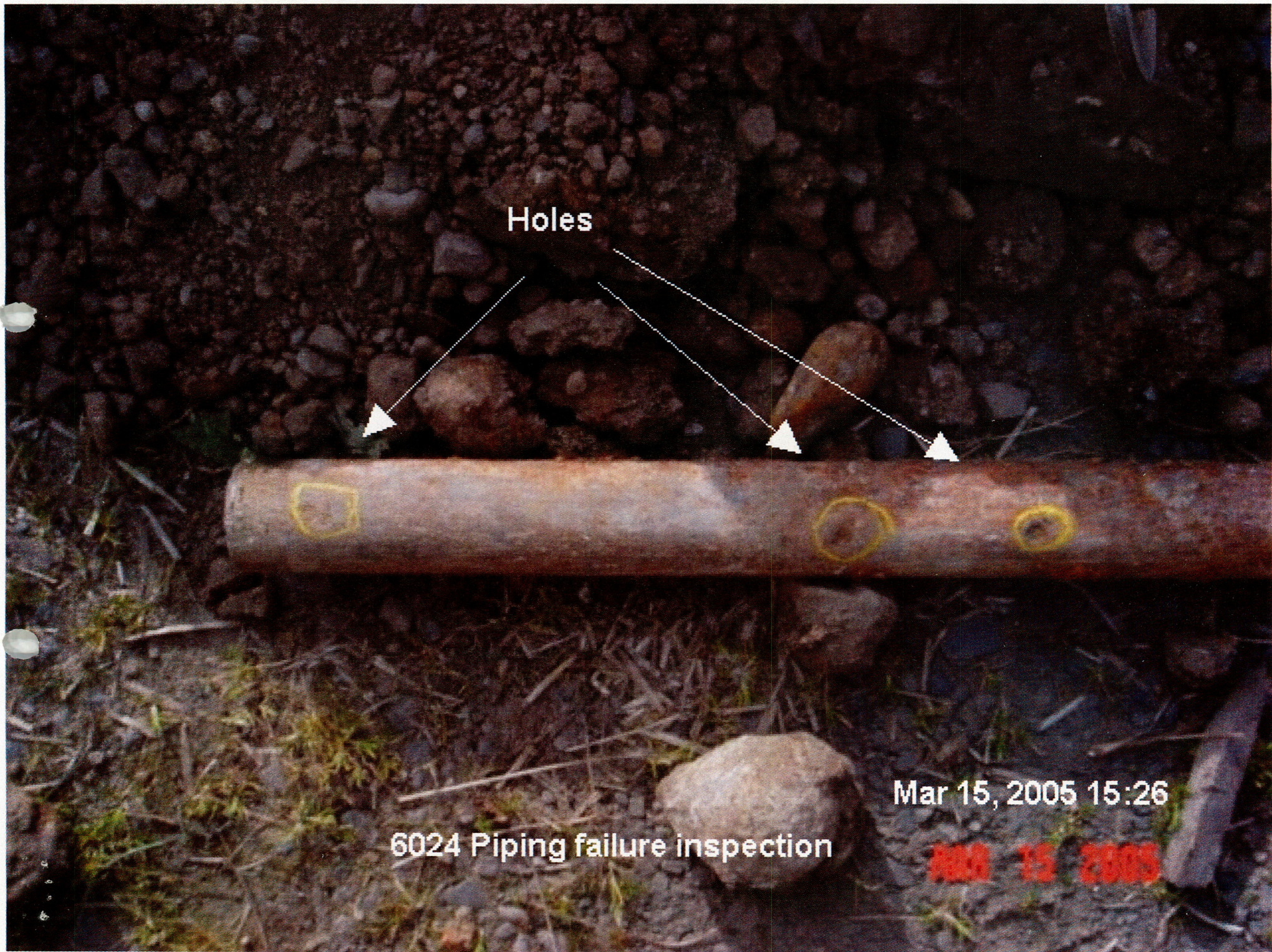


Point of identified piping failure

6024 Piping failure inspection

Mar 15, 2005 15:27

MAR 15 2005



Holes

Mar 15, 2005 15:26

6024 Piping failure inspection

MAR 15 2005



Oregon

Theodore R. Kulongoski, Governor

Department of Environmental Quality

Northwest Region Portland Office

2020 SW 4th Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

FAX (503) 229-6945

TTY (503) 229-5471

March 16, 2005

LEE POWELL JR
POWELL DISTRIBUTING
PO BOX 17160
PORTLAND OR 97217

RE: Molalla Kwik Gas
File No.: 03-05-0461

On March 15, 2005, a release was reported from an underground storage tank (UST) system at your facility located at 307 S. Main in Molalla, Oregon. As the responsible party for the facility, you are required to clean up the release according to OAR 340-122-201 through 340-122-360. These rules require cleaning up the soil, groundwater, surface water and any other media contaminated by petroleum to the appropriate standards or demonstrating that the contamination does not pose a risk to human health or the environment. We are looking forward to working with you to bring this site to closure.

An Initial Report Form for UST Cleanup Projects is enclosed. This form needs to be completed and returned to this office within twenty (20) days from the date the release was reported. An outline of additional reporting requirements that includes due dates for submittals is also enclosed. A copy of the UST Cleanup regulations or an application for a letter of authorization for soil treatment will be provided upon request. As the responsible party, you should be aware of the requirements for cleanup, even if you have hired a qualified contractor or consultant to assist you.

Please reference the DEQ File Number listed above in all future correspondence and reports.

By law, DEQ is required to recover project oversight costs. DEQ oversight begins with the initial site characterization and continues through site closure. Oversight includes activities such as reviewing reports, preparing correspondence, answering technical questions, site inspections, and enforcement actions. **You will be receiving an invoice each month for all oversight activities performed to date.**

DEQ's highest priority for oversight are those sites that pose the greatest hazard to human health, safety and the environment. As a result, many lower environmental priority sites will not be reviewed in detail or receive a final "No Further Action" or "closure" letter from DEQ until the higher priority sites are addressed. However, all projects, simple or complex, require at least some oversight. At a minimum, review is conducted to determine the environmental priority of the cleanup project.

For those responsible parties who desire DEQ oversight regardless of environmental priority, we have

Initial Letter
March 16, 2005
Page 2

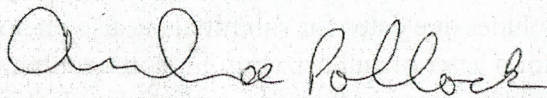
have developed a Responsible Party Priority Site Program. To receive oversight and more effectively schedule your project, you will be asked to sign an agreement requesting priority review and confirming your agreement to pay DEQ oversight costs in a timely manner.

Not entering into the Agreement does not release you from responsibility for investigation and/or cleanup of the contamination, nor does it mean that you are exempt from paying for DEQ oversight costs. Please be aware that there may be a waiting list for assignment to the next available project manager, and that these projects are assigned on a first come, first served basis.

Please read the attached information on the cost recovery and invoice process. We have also included information about the Responsible Party Priority Site Program and an agreement, if you are interested in expediting review of your project. You may contact the Land Quality Division at (503) 229-6635 if you have questions about cost recovery.

Thank you for your cooperation and continued efforts to comply with the regulations. **If you have any questions about the regulations and/or your cleanup project, please call (503) 229-5263 and ask to speak to the Underground Storage Tank Duty Officer.**

Sincerely,



Andree Pollock, Manager
UST Cleanup and Compliance Section

Enclosures

RAWSON Stephanie

From: TORAN Greg
Sent: Tuesday, March 15, 2005 5:52 PM
To: RAWSON Stephanie
Cc: IDING Keith; POLLOCK Andree
Subject: f 6024

Facility ID 6024 SIC 5541 LUST facility N
Facility Name MOLALLA KWIK GAS
Facility Address 307 S MAIN
City, ST Zip MOLALLA

Confirmed release reported today by SME. Cause of the release is corrosion holes in single wall steel piping. Gasoline into soil, depth to groundwater is unknown. Writing up the details to a file memo. I will need the lust number for this initial investigation.

Charging three and a half hours lust time today plus the time to write up the file memo tomorrow. After that, time will be charged to UST O & M inspection.

Gregory Toran
Department of Environmental Quality

UST Compliance Query

----- Facility -----

Facility ID 6024 SIC 5541 LUST facility N
 Facility Name MOLALLA KWIK GAS
 Facility Address 307 S MAIN
 City, ST Zip MOLALLA OR 97038

Comments

91 thru 93 fees PIF on mod app, Tanks #3 and #4 manifolded
 ----- Tanks -----

Tank ID	4	Contents:	
Tank Status	ACTIVE	Empty	
Date Decomm.		Petroleum	GASOLINE
Permit #	ABEEG	Haz. Material	
Permit Status	ACTIVE	Unknown	
Installed	08APR1977	Construction	STEEL
Gallons	10000	External Prot	EXTERNAL CATHODIC
Overfill			
Leak Detect	STOCK INVENTORY,		

Count: *5

^ v

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