

SML Associates

6920 S.W. 92nd Avenue, Unit 10
Portland, Oregon 97223
Phone/Fax: (503) 768-4512

DEPT OF ENVIRONMENTAL QUALITY
RECEIVED

AUG 25 1995

NORTHWEST REGION

August 23, 1995

Mr. Rick Silverman
Environmental Specialist
DEQ Northwest Region, UST Section
2020 S.W. 4th Ave, Suite 400
Portland, Oregon 97201
(503) 229-5477

Re: CAP for Meadowbrook Grocery, DEQ File # 03-92-125

Dear Mr. Silverman:

Per your letter of June 15, 1995 and our telephone conversation of July 11th, the following is presented as a modified Corrective Action Plan (CAP) for the above mentioned site. I've also enclosed the first quarter groundwater monitoring report. As stated, from a review of the data they provided me, I have reason to believe their initial analyses of lead was done for total, not dissolved lead. Thus the false high values reported. Therefore they have restarting their four quarters of monitoring under my guidance, resampling for dissolved lead.

Background

The Meadowbrook Grocery is a family owned business approximately three miles northeast of Molalla, Oregon on State Highway 211(Fig. 1). The site consists of a wood frame structure with two fuel pumps and a private residence to the north of the store. Prior to decommissioning by removal the property had three gasoline underground storage tanks, 2,000, 1,000 and 500 gallons, on the west side of the store, under an asphalt parking area (Fig. 2). Photographs of the property are presented as Attachment I. All three tanks were registered and were replaced by an above ground system in May, 1992. Copies of the UST 30-day Change in Service Notice, Service Providers report, Decommissioning Checklist and Soil Matrix Score Sheet are provided as Attachment II.

Due to actions by the removal contractor approximately 35 cubic yards of soil was contaminated with gasoline. The Frison's aerated the soil to acceptable limits on their property. The soil was then place in a fenced area and covered with 12 inches, or more, of clean topsoil. A copy of Ms. Frison's letter to the case officer the in charge of the case summarizing the occurrence and the solid waste permit/authorization letter for onsite treatment are presented in Attachment III. The present location of the treated soil can be seen on Figure 2 and photographs 3 and 4. The sludge from the tank, which the contractor left onsite, was disposed at Hillsboro landfill. A copy of the disposal permit is also presented in Attachment III.

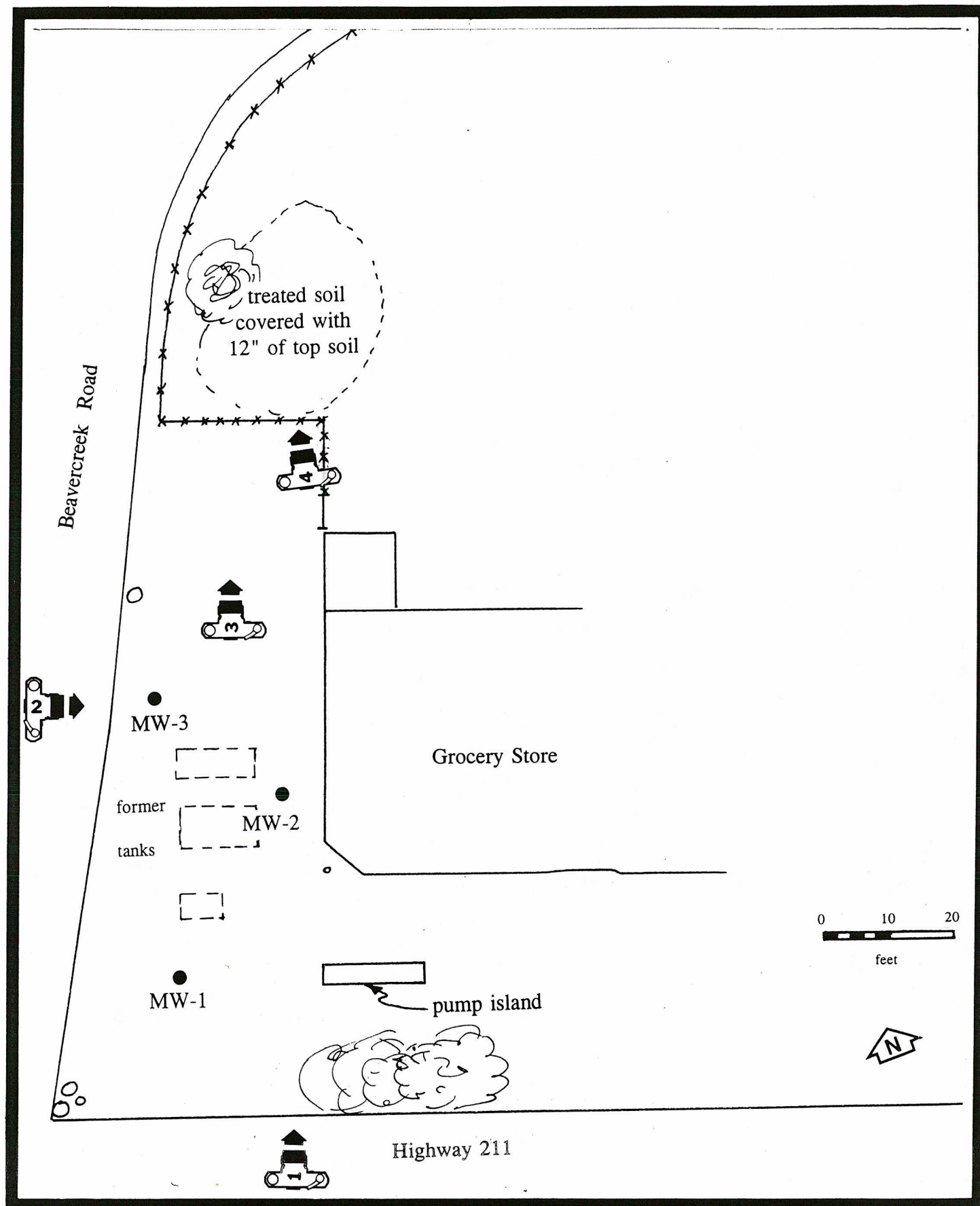


Figure 2

Site Diagram
Meadowbrook Grocery
16845 So. Highway 211
Mololla, Oregon

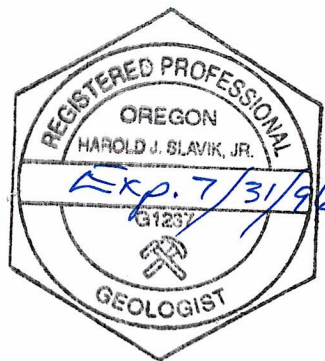
Proposed Mitigation

The Frison's installed three monitoring wells, locations which are shown on figure 2, however they were totally uninformed as to proper protocols for purging, sampling and analyses. Consequently their results todate are very suspect, especially the lead. We believe the lead analyses todate have been for total lead, not dissolved. Therefore, we propose a new start to a quarterly groundwater monitoring program. We have made arrangements with Oregon Analytical Laboratory to provide the Frison's with appropriate containers and conduct the analyses. We also spent a day with Mr. Frison instructing him in measuring the depth to groundwater, the proper purging and sampling techniques, storage of purge water and arranged for a surveying of the wells. The Firson's will conduct future groundwater monitor sampling. We will assist them with the groundwater flow direction determinations, based upon their measurements. At this time we are recommending natural biodegradation, with ongoing evaluations based upon the quarterly groundwater results.

If you have any questions or I can be of further assistance please call us at (503) 768-4512.

Sincerely,
SML Associates


Harold J. Slavik, Jr., PG, REA
President



cc: Toni & Jack Frison
Meadowbrook Grocery

enc.

ATTACHMENT I

Photographs



1. View of Meadowbrook Grocery from south, across South Highway 211.



2. View of Meadowbrook Grocery from west, across Beaver Creek Road. Former tank locations marked by arrows.



3. View of soil disposal area from parking area on west side of store.



4. Close-up of soil disposal area. The aerated soil has been covered by 12 inches of clean fill.

ATTACHMENT II

Decommissioning Documents

Montgomery Development Co., Inc.

P.O. Box 130
Sandy, Oregon 97055
(503) 668-4847
Eves. (503) 658-6083

page 1 of 1

Meadow Brook Grocery
16845 SW Hwy 211
Molalla, Oregon 97038
(503) 829 - 9165

dated 6 / 5 / 1992

DEQ File # 03-92-125

Re: Disposition of contaminated contents of tanks and
contaminated soils.

Soils:

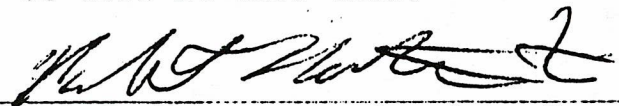
Approximately 32 to 38 cubic yards is now stored at this site. The larger stock pile is to the west of the store while the smaller pile is to the east side of the store in the field area. Both piles are covered under and over with plastic sheeting.

Tank Contents:

The tank contents removed when the tanks were cleaned out is now stored in a D.O.T. 55 gallon drum containing approximately 50 gallons of tank scum. This drum is now at the site next to the new above ground tank to the north of that tank.

These materials are to be disposed of by others and is beyond our scope of work at this time.

Signed: _____


Robert G. Montgomery Jr. Sec./Treas.
Montgomery Development Co. Inc.

Montgomery Development Co., Inc.

P.O. Box 130
Sandy, Oregon 97055
(503) 668-4847
Eves. (503) 658-6083

Test Results:

page 3 of 3

Testing of sample number #3 for TPH - HCID indicates gasoline contamination.

Follow up tests indicated that the samples numbers #1 and #2 are, ND for #1 TPH - G, and only 2.2 ppm #2 for TPH -G in the island area.

However the rest of the samples indicate a wide range of contaminate levels and even extremely high levels in samples numbers five through eight for soils.

The water sample is extremely high in BTEX compounds as indicated by test results of sample number #9.

#9 ground water - Benzene	6,900
Ethylbenzene	11,000
Tolulene	11,000
Total Xylenes	63,000

Results expressed as ug/l unless otherwise noted.

See note on page two of the Coffey Laboratories, Inc. report

(Surrogate spike recovery could not be calculated because of the concentration of hydrocarbons present.)

Conclusions:

As to the cause of the release, that cannot be definitely determined as to the type of equipment failure. As to the conditions of the soils and water it is very obvious that the soils and water are highly impacted by contamination of gasoline products released in this tank farm. The extent of this contaminate plume is not yet known.

Excavation back fill conditions:

Immediately after sampling was completed the tank farm was lined with plastic and new gravel fill materials were placed to prevent hazards to the public. The tank farm is easily accessible by the public and vehicular traffic near the store and from Beaver Creek Road.

This completes Montgomery Development's scope of work.

Signed: Robert G. Montgomery Jr. DATED 6/5/92
Robert G. Montgomery Jr. Sec./Treas., Site Supervisor
Montgomery Development Co. Inc.

Montgomery Development Co., Inc.

P.O. Box 130
Sandy, Oregon 97055
(503) 668-4847
Eves. (503) 658-6083

Oregon D.E.Q.
N.W. Region
1500 S.W First Avenue, Suite 750
Portland, Oregon 97201 - 5884
229 - 6385

page 1 of 3

Attn: Sue Mayjors

Re: Meadow Brook Grocery
16845 SW Hwy 211
Molalla, Oregon 97038
ph. # (503) 829 - 9165
D.E.Q. Facility ID # 7673

Owner: Toni Frison
(contact person)
829 - 9165

Decommissioning work by: Montgomery Development Co. Inc.
P.O. Box 130
Sandy, Oregon 97055
97055

Site Supervisor for removal: Robert G. Montgomery Jr.
ph # 668 - 4847

Site Description:

The site at the above address known as the Meadow Brook Grocery is bordered on two sides by main road ways. The tanks removed were between the West side of the building front and the East side of the right of way known as Beaver Creek Road.

Tanks Description:

Three gasoline storage tanks were removed from this tank farm. Each tank was removed and closely examined for evidence of leaks through the tank walls. This same process was repeated at the shop where the tanks were to be destroyed for recycling. No tank holes were found at either times of inspection. One tank measured approximately four feet by six feet, another measured approximately four feet by twelve feet and the third tank measured approximately six feet by twelve feet.

Tank Contents:

Each tank had stored gasoline fuels. One tank just prior to removal had stored regular gasoline and the other had stored unleaded gasoline. The third tank had not been used recently for storage but was connected by piping to the original island. Approximately 50 gallons of gasoline tank sludges and water were removed from the tanks prior to final decommissioning. This sludge is now at the site of origin awaiting disposal by others. The sludges are in a D.O.T. 55 gallon drum container.

Montgomery Development Co., Inc.

P.O. Box 130
Sandy, Oregon 97055
(503) 668-4847
Eves. (503) 658-6083

Piping Conditions:

page 2 of 3

Piping had been installed to provide for a suction system. In the area of the island the pipe conditions appeared to be good. In the tank farm the piping showed definite signs of electrolysis and fatigue.

Excavation Conditions at the site:

The largest tank was excavated to a depth of approximately nine feet in a East, West, direction perpendicular to the structure. Enough back fill and soils were removed to remove the tank. The other two tanks were excavated to a depth of approximately seven feet in a North, South, direction parallel the structure and directly South of the largest tank first removed. Soils surrounding the tanks were of the round cobble type, primarily in the pea gravel to four inch size with varying layers of clays above and mixed in with the cobbles. Ground water was encountered at the approximate depth of six feet.

Sampling Procedures and Locations:

Soil samples were taken and placed in sterile jars with Teflon protected lids. A water sample was taken in a vial provided by Coffee Labs that was prepared with hydrochloric acid. Samples were placed in cooler and delivered to Coffee Labs on 5 - 2 - 92 for testing.

Sample Locations:

Sample numbers #1 and #2 were taken in the island area directly under the pump positions after the small amount of contaminated soils had been removed to approximately two and a half feet in depth from the surface slab.

Sample numbers #3 and #4 were taken at approximately nine feet from the surface in the area directly under the first tank location.

Sample numbers #5 and #6 were taken under the second tank removed at approximately seven feet from the surface in the area directly under the tank.

Sample numbers #7 and #8 were taken under the last tank removed at approximately seven feet from, the surface and directly under the tank location.

Sample number nine was taken of the water in the tank pit which returned rapidly after the pit was purged onto the contaminated soils pile briefly.

BEAVER CREEK ROAD

AGRICULTURAL
USE

NORTH

#9 WATER
SAMPLE

NEW TANK

CATTLE
FENCE
(EXIST'G)

GUARD
POSTS (4)

CHAIN LINK
FENCE
(BY OTHERS)

NEW U/G SUPPLY
PIPING

FIRE EXT.
2A-20B-C

TELEPHONE
EMERGENCY
SHUT-OFF

SUCTION
PUMPS

EXISTING
STORE BLDG

GATE

TANKS

5' MIN

12' ±

NOZZLE

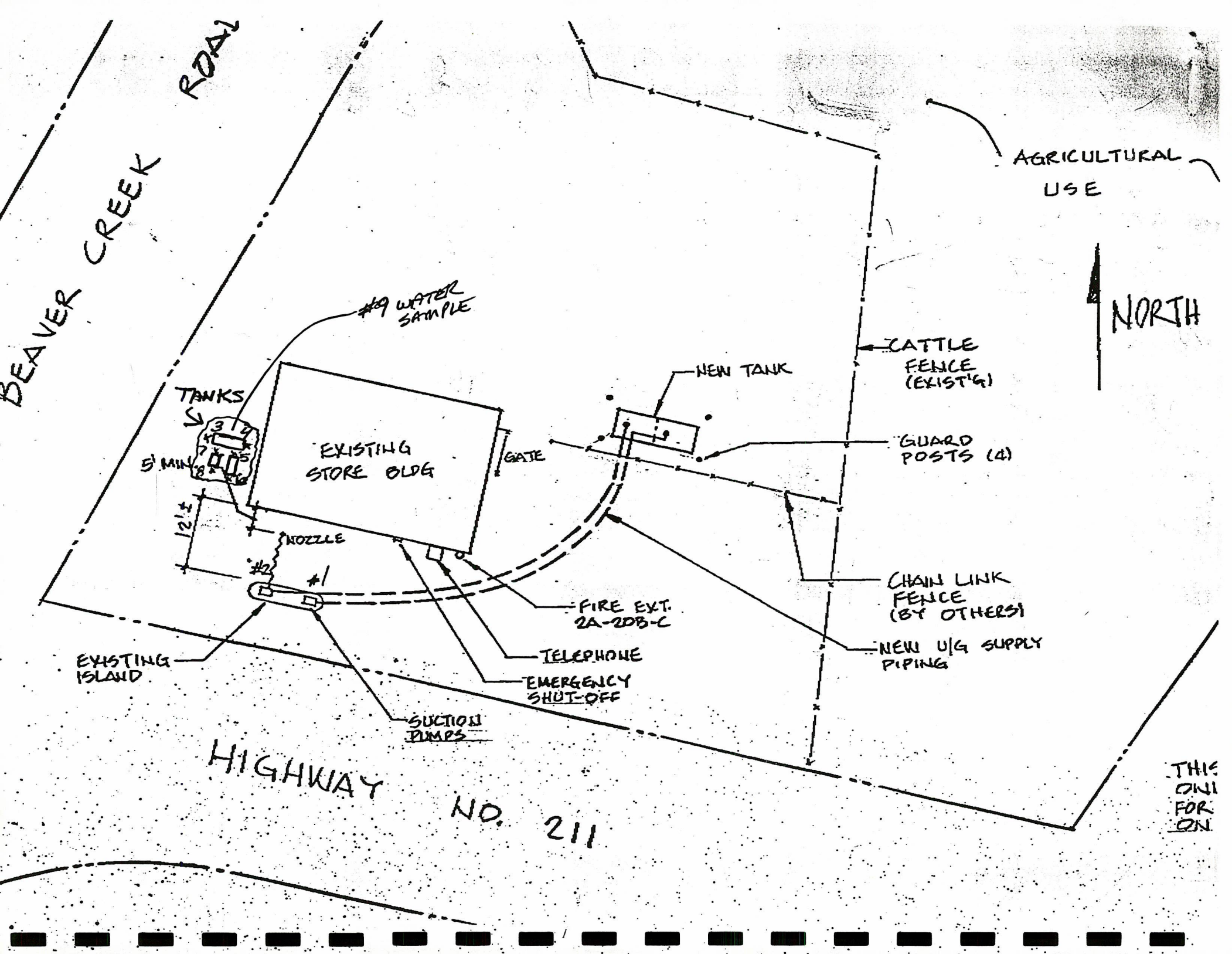
#2

#1

EXISTING
ISLAND

HIGHWAY
NO. 211

THIS
ONE
FOR
ON





Report Date: May 18, 1992

Job#: GE-920502A-9

PO#: None

Project#: None

Project: Meadow Brook
Store

Attention: Bob Montgomery Jr.
Montgomery Development
P.O. Box 130
Sandy, OR 97055

SAMPLE INFORMATION:

Date Samples Were Received By Laboratory: 05/02/92

Lab No.	Field Identification	Sample Matrix	Date	Time
1	#1	Soil	04-30-92	1300
2	#2	Soil	04-30-92	1300
3	#3	Soil	04-30-92	1300
4	#4	Soil	04-30-92	1300
5	#5	Soil	04-30-92	1300
6	#6	Soil	04-30-92	1300
7	#7	Soil	04-30-92	1300
8	#8	Soil	04-30-92	1300
9	#9	Ground Water	04-30-92	1300

ANALYTICAL RESULTS ARE ON THE FOLLOWING PAGE(S).

Sincerely,


Renee Chauvin
Technical Director

RJC/lws

This report is for the sole and exclusive use of the above-named client. Samples are retained 15 days from the report date, or until holding time expires. Results pertain only to samples submitted.

COFFEY LABORATORIES, INC.

12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452



Job#: GE-920502A-9

Montgomery Development
Page 2

Analysis Performed: TPH-G, by the Oregon DEQ method, purge-&-trap,
GC/PID.

PARAMETER	DETECTION LIMIT	SAMPLE #1 RESULTS	SAMPLE #2 RESULTS	SAMPLE #3 RESULTS	SAMPLE #4 RESULTS
Gasoline	2	ND	2.2	75	140
Surrogate Recovery (%)		105	75	NA*	NA*

PARAMETER	DETECTION LIMIT	SAMPLE #5 RESULTS	SAMPLE #6 RESULTS	SAMPLE #7 RESULTS
Gasoline	7.5	2,300	1,300	2,000
Surrogate Recovery (%)		73	NA*	NA*

PARAMETER	DETECTION LIMIT	SAMPLE #8 RESULTS	SAMPLE #8 DUPLICATE RESULTS
Gasoline	7.5	3,500	4,900
Surrogate Recovery (%)		NA*	NA*

*Surrogate spike recovery could not be calculated because of the concentration of hydrocarbons present.

Results expressed as mg/kg unless otherwise noted.

ND means none detected at or above the detection limit listed.

REPORT CONTINUES



Job#: GE-920502A-9

Montgomery Development
Page 3

Analysis Performed: TPH-HCID qualitative scan for Hydrocarbons, by GC/FID.

Summary of Qualitative Screening Test:

SAMPLE #3
RESULTS

Gasoline detected by TPH-HCID

✓

Gasoline not detected by TPH-HCID

Diesel detected by TPH-HCID

Diesel not detected by TPH-HCID

✓

Hydrocarbons heavier than C28 detected

Recommended further analysis:

TPH-G

✓

TPH-D

TPH-418.1

None

Surrogate Recovery %

108

REPORT CONTINUES

COFFEY LABORATORIES, INC.

12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452



Job#: GE-920502A-9

Montgomery Development
Page 4

Analysis Performed: BTXE in water by EPA Method 602, GC/PID

ANALYTE -----	DETECTION LIMIT -----	LABORATORY BLANK -----	SAMPLE #9 RESULTS -----
Benzene	5,000	ND	6,900
Ethylbenzene	5,000	ND	11,000
Toluene	5,000	ND	11,000
Total Xylenes	5,000	ND	63,000

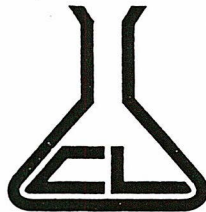
Results expressed as $\mu\text{g/L}$ unless otherwise noted.

ND means none detected at or above the detection limit listed.

COFFEY LABORATORIES, INC.

12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452

CHAIN OF CUSTODY



(503) 276-0385

PROJECT #:	PROJECT NAME:	P.O. #:	PAGE _____ of _____ PAGES PLEASE PRINT OR TYPE	FOR LABORATORY USE ONLY		
COMPANY NAME: MONTGOMERY DEV. CO.			JOB #:			
REPORT ATTENTION: ROBERT OR.			CUSTABBR:			
SAMPLES COLLECTED BY:			MONTGOMERY			
FIELD IDENTIFICATION:		COLLECTION		MEDIA	ANALYSIS REQUESTED	ANALYSIS REMARKS
ONE LINE PER SAMPLE CONTAINER	LOG #	DATE	TIME			
# 1		4-30-92	2 PM	SOIL	TPH-G	
# 2		"	"			
# 3		"	"			
# 4		"	"			
# 5		"	"			
# 6		"	"			
# 7		"	"			
# 8		"	"			
# 9		"	"	WATER	BTIX	
RELINQUISHED BY: Robert Montgomery	DATE/TIME: 5-2-1992	RECEIVED BY:	DATE/TIME:	LAB USE		
RELINQUISHED BY:	DATE/TIME:	RECEIVED BY LAB: Crystal Burkholder	DATE/TIME: 5/2/92	1320		
SAMPLE REMARKS:		LEVEL 1 2 3 4 EXPRESS UPS MAIL (X) GREY TAN LAL				

WHITE COPY - COFFEY LABORATORIES

PINK COPY - CLIENTS COPY

SHADED AREA FOR LABORATORY USE ONLY
CHAIN OF CUSTODY INSTRUCTIONS ON BACK OF PINK COPY

Oregon Department of Environmental Quality
UNDERGROUND STORAGE TANK DECOMMISSIONING/SERVICE CHANGE REPORT

DEQ FACILITY NUMBER: 7673DATE: 6-5-92FACILITY NAME: MEADOWBROOK GROCERYFACILITY ADDRESS: 16845 SW HWY 211MOLALLA, OR 97038PHONE: (503) 829-9165

The following information **MUST** be submitted by the underground storage tank owner, operator or licensed DEQ Supervisor within 30 days following completion of the tank decommissioning or changing tank contents to a non-regulated substance. (OAR 340-150-001 through -150)

The attached supplemental checklist should be prepared by the person performing the decommissioning. The checklist should be provided to DEQ and the tank owner to demonstrate that all required practices were followed.

Ordinarily the checklist is filled out by the DEQ licensed Service Provider or Supervisor. Owners who wish to personally decommission a tank must follow all DEQ and other applicable standards. The owner should contact the DEQ Regional Office prior to starting the decommissioning to receive current copies of underground storage tank regulations.

A. DATES:Decommissioning/Service Change Notice - Date Submitted: 2/12/92 (30 days before work starts)Work Start Telephone Notice - Date Submitted: 4/23/92 ^{3:30 PM} (3 working days before work starts)DEQ Person Notified: JILLIE MANNORSDate Work Started: 4/28/92Date Work Completed: 4/29/92

Note: Provide the following information if any soil or water contamination is found during the decommissioning. Contamination must be reported by the UST owner or operator within 24 hours. The licensed service provider must report contamination within 72 hours after discovery unless previously reported.

Date Contamination Reported: 4/29/ By: BOB MONTGOMERY JR.DEQ Person Notified: JILLIE MANNORSBackfill Telephone Notice - Date Called: 4/29/ (before backfilling) — MATTER OF SAFETY

DEQ Person Notified: _____

B. PERMITS:N.A.

Note: DEQ permits or an addendum to the UST permit(s) may be needed where soil or water cleanup is required.

DEQ Water Discharge Permit #: _____ Date: _____

Disposed to (Location): _____

DEQ Solid Waste Disposal Permit #: _____ Date: _____

B. PERMITS (Continued)

UST Soil Treatment Permit Addendum - Type: _____ Date: _____

Soil Disposal or Treatment Location: _____

C. TANK INFORMATION:

Tank #	DEQ UST Permit	Tank Size in (Gallons)	Product: Gasoline, Diesel, Used Oil, Other?		Closure or Service Change?			Tank to be Replaced?	
			Present	New	Tank Removal	Closure [∞] Inplace	New [∞] Product	Yes*	No
1	FFEC	2,000	GAS		(X)				(X)
2	FFED	1,000	GAS		(X)				(X)
3	FFEE	550	GAS		(X)				(X)

* Where decommissioned tank(s) are replaced by new underground storage tanks the UST owner or operator must submit a new permit application containing information on the new tanks 30 days before placing them in service.

∞ 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 a non-regulated substance, or 3) tank contains a regulated substance other than petroleum.

D. DISPOSAL INFORMATION:

Tank #	Tank & Piping Disposal Method				Disposal Location of Tank Contents	
	Scrap	Land-fill	Other	Identify Location & Property Owner	Liquids	Sludges
1	✓				ON SITE	4
2	✓				ON SITE	4
3	✓				ON SITE	11

* Note: The tank contents, the tank and the piping may be subject to the requirements of Hazardous Waste regulations. If you have questions, contact the DEQ Hazardous Waste Section at (503) 229-5913 or DEQ regional office hazardous waste staff.

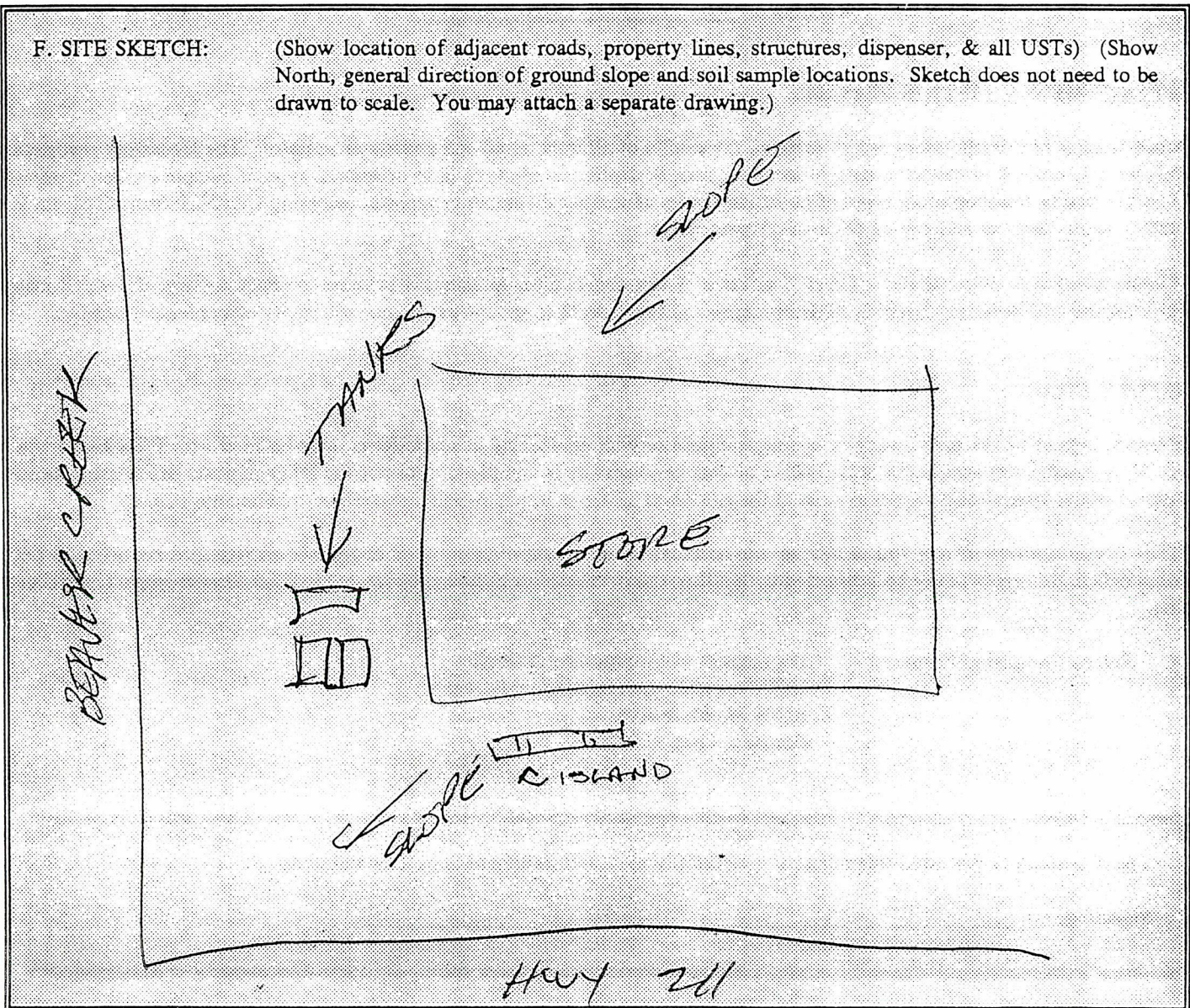
E. CONTAMINATION INFORMATION:

Tank #	Ground* water in pit?	Product odor in soil?	Product stains in soil?	Number of Samples	Laboratory (Name, City, State, Phone)
1	✓	✓	✓	2	CORPUS
2	✓	✓	✓	2	"
3	✓	✓	✓	2	"

* Note: Sampling is required if groundwater is encountered. See cleanup rules.

F. SITE SKETCH:

(Show location of adjacent roads, property lines, structures, dispenser, & all USTs) (Show North, general direction of ground slope and soil sample locations. Sketch does not need to be drawn to scale. You may attach a separate drawing.)



G. WORK PERFORMED BY:

DEQ Service Provider's License #: 10266 Construction Contractors License #: _____

Name: MONTGOMERY DEVELOPMENT CO. INC.
Telephone: 668-4847

DEQ Decommissioning Supervisor's License #: 10377

Name: BOB MONTGOMERY
Telephone: 668-4847

DEQ Soil Matrix Service Provider's License #: _____ (If applicable)

Name: _____
Telephone: _____

DEQ Soil Matrix Supervisor's License #: _____ (If applicable)

Name: _____
Telephone: _____

H. ATTACHMENTS TO THIS REPORT:

1. Attach a copy of the laboratory report showing the results of all tests on all soil and water samples. The laboratory report must identify sample collection methods, sample location, sample depth, sample type (soil or water), type of sample container, sample temperature during transportation, types of tests, and copies of analytical laboratory reports, including QA/QL information. Include laboratory name, address and copies of chain-of-custody forms.
2. If contamination is detected and a Level 2 or Level 3 soil matrix cleanup standard is selected attach a copy of the soil matrix analysis for the site including methods of determining soil type, depth to groundwater, and sensitivity of uppermost aquifer.

I. REPORT FILING:

This report, signed by the tank owner or operator, complete with all applicable attachments must be filed with DEQ headquarters within 30 days after the excavation is backfilled or change-in-service is complete. Contact the DEQ regional office prior to filing this report where special circumstances exist at the site (such as water in pit, remaining pockets or contamination, etc.).

NOTE: If contamination was found during site assessment at decommissioning or change-in-service and reported to DEQ regional office, this report may be submitted with either the first interim cleanup report or the final cleanup report, whichever is first.

Return Completed Form to: Department of Environmental Quality
UST Program - Decommissioning Report
811 S.W. Sixth Ave.
Portland, Oregon 97204

I have personally reviewed this report and the attachments and find them to be true and complete.

Signature: _____ Date: _____
(Owner or Operator)

For information: (503) 229-5733 or Toll Free in Oregon 1-800-452-4011

Oregon Department of Environmental Quality
UNDERGROUND STORAGE TANK DECOMMISSIONING CHECKLIST

DEQ FACILITY NUMBER: 7673DATE: 6-5-92FACILITY NAME: MEADOWBROOK GROCERYFACILITY ADDRESS: 16845 SW HWY 211
MOLALLA, OR 97038PHONE: (503) 829-9165**A. SAFETY EQUIPMENT ON JOB SITE:**

Fire Extinguisher:

Type/Size:

ABC 10LB

Recharge Date:

5-10-93

Combustible Gas Detector:

Model:

GAS TEL

Calibration Date:

6-1-92

Oxygen Analyzer:

Model:

Calibration Date:

B. DECOMMISSIONING: All Tanks: (Unk. = Unknown, N/A = Not Applicable)
(Check Appropriate Box)

1. All electrical equipment grounded and explosion proof?
2. Safety equipment on job site?
3. Overhead electrical lines located?
4. Subsurface electrical lines off or disconnected?
5. Natural gas lines off or disconnected?
6. No open fires or smoking material in area?
7. Vehicle and pedestrian traffic controlled?
8. Excavation material area cleared?
9. Rainwater runoff directed to treatment area?
10. Drained and collected product from lines?
11. Removed product and residual from tank?
12. Cleaned tank?
13. Excavated to top of tank?
14. Removed tank fixtures? (pumps, leak detection equip.
15. Removed product, fill and vent lines?

Yes	No	Unk	N/A
☒			
☒			
☒			
☒			
			☒
☒			
☒			
☒			
			☒
☒			
☒			
☒			
☒			
☒			
☒			

C. TANK ABANDONMENT IN-PLACE:

16. Sampling plan approved by DEQ?

Date:

DEQ Staff:

NA

--	--	--	--

B. DECOMMISSIONING: All Tanks: (Unk. = Unknown, N/A = Not Applicable)
(Check Appropriate Box)

Yes	No	Unk	N/A
	✓		
✓			

17. Contamination concerns fully resolved?

18. Fill Material? Type: PEA ROCK

D. TANK REMOVAL:

19. Tank placement area cleared, chocks placed?

20. Purged or ventilated tank to prevent explosion?
Method used: PURGE Meter reading: 10

21. No chains or steel cables wrapped around tank for removal?

22. Tank removed, set on ground, blocked to prevent movement?

23. Tank set on truck and secured with strap(s)?

24. Tank labeled before leaving site?

✓			
✓			
✓			
			✓
✓			
✓			

E. SITE ASSESSMENT:

25. Site assessed for contamination? See OAR 340-122-340

26. Soil samples taken and analyzed?

27. Decommissioning/Change-in-Service report sent to DEQ?

28. Was contamination found? Date/Time: _____

29. Was contamination reported to DEQ? By: BOB JR.
Date/Time: 4/29/92 DEQ Staff: JULIE MAHORE

30. Was hazardous waste determination made for tank contents (Liquids/sludges)?

	✓		
✓			
✓			
✓			
✓			
	✓		

31. Disposal location of tank(s) contents.

Name: NA

Date: _____

ON SITE

Address: STORED AT MEGADON BRICK

STORE SITE DET. TRUM

Attach disposal receipt.

32. Disposal or recycling location of removed tank(s) and associated piping.

Name: SEANITZER

Date: TO BE DETERMINED

Address: _____

Attach disposal receipt.

33. If tank(s) are intended to be reused, identify new tank site.

Name: NA

Date: _____

Address: _____

Purpose of Reuse: NA

F. WORK PERFORMED BY:

DEQ Service Provider's License #: 10266

Name: MONTGOMERY DEVELOPMENT CO. INC.

Telephone: 608-4847

DEQ Decommissioning Supervisor's License #: 10377

Name: ROBERT MONTGOMERY JR.

Telephone: 608-4847

E. CHECKLIST FILING:

1. Provide copy of checklist to the UST owner and operator.
2. Send completed checklist to the DEQ headquarters within 30 days after the excavation is backfilled.

NOTE: If contamination was found during decommissioning and reported to DEQ regional office, this report may be submitted with either the first interim cleanup report or the final cleanup report, whichever is first.

Send Completed Form to:

Department of Environmental Quality
UST Program - Decommissioning Checklist
811 S.W. Sixth Ave.
Portland, Oregon 97204

I have personally reviewed this decommissioning checklist and find it to be true and complete.

Signature: [Signature] Date: 6-7-92
(Licensed Supervisor)

Signature: _____ Date: _____
(Owner or Operator)

For information: (503) 229-5559 or Toll Free in Oregon 1-800-452-4011

Matrix Checklist

- ✓ 1. The release of petroleum has been reported to the Department of Environmental Quality (220).
- ✓ 2. The Matrix score sheet attached to this checklist has been completed for this site, unless the site is being cleaned up to the most stringent cleanup level (320).
- NA 3. If the cleanup level used for this site is one of the three diesel cleanup levels, a hydrocarbon identification (HCID) test has been performed which proves that the soil contamination is not from gasoline (335(3)).
- ✓ 4. A sketch has been made of this site (345(1)). This sketch clearly shows:
 - ✓ a. The location of all buildings and other key features, both man-made and natural;
 - ✓ b. The names of adjacent streets and properties;
 - ✓ c. The location of all excavations including those that were for the removal of tanks and associated piping as well as those that were strictly for the removal of contaminated soils;
 - ✓ d. The location of all product storage tanks, lines and dispensers, including those that were decommissioned as well as those that remain on the site; and
 - ✓ e. The locations from which all soil and water samples were collected.
- ✓ 5. If any contaminated soil in excess of matrix limits has been left on site, the reason for leaving this soil has been explained and the requirements of 355(4) have been met.
- ✓ 6. If water was present in the tank pit, the Department was notified, the water was pumped from the pit, and the requirements of 340(4) have been met.
- ✓ 7. All soil and/or water samples have been collected, coded, stored and shipped as specified in the rules, and proper chain-of-custody forms have been filled out (345).
- NA 8. All final confirmatory soil samples have been analyzed using the methods required by the Department (350).
- NA 9. If a tank was decommissioned in place, the Department gave prior approval for a site-specific sampling plan (340(5)).
- ✓ 10. A report has been prepared which contains all of the information required by the rules (360).

MATRIX SCORE SHEET

1. Depth to Groundwater < 25 feet (10) 25 - 50 feet (7) 51 - 100 feet (4) > 100 feet (1)	10
2. Mean Annual Precipitation >40 inches (10) 20 - 40 inches (5) <20 inches (1)	10
3. Native Soil Type Coarse sands, gravels (10) Silts, fine sands (5) Clays (1)	10
4. Sensitivity of Uppermost Aquifer Sole Source (10) Current Potable (7) Future Potable (4) Non-potable (1)	4
5. Potential Receptors Many, near (10) Medium (5) Few, far (1)	10
TOTAL SCORE =	44

Matrix Score	Cleanup Level in ppm TPH	
	Gasoline	Diesel
Level 1: > 40 pts.	40	100
Level 2: 25 - 40 pts.	80	500
Level 3: < 25 pts.	130	1000

ATTACHMENT III

**Authorization Letter
and
Incident Summary Letter**

SOLID WASTE LETTER AUTHORIZATION

PERMIT APPLICATION

DEQ USE ONLY

Application Rec'd: _____

Fee Rec'd: _____

Approved/Denied: _____

Management of Petroleum Contaminated Soils from an UST Cleanup Project

THIS APPLICATION IS FOR THE FOLLOWING ACTIVITY:

Treatment Activity

Complete Questions Listed

____ On-site Thermal Treatment (mobile unit)
____ On-site Bioremediation
X On-site Soil Aeration
____ Off-site Thermal Treatment (mobile unit)
____ Off-site Bioremediation
____ Off-site Soil Aeration

#1, #2, #4, #5, and #7
#1, #2, #3, #5, and #7
#1, #2, #3, #5, and #7
#1, #2, #4, #5, and #6
#1, #2, #3, #5, and #6
#1, #2, #3, #5, and #6

< PLEASE COMPLETE THE FOLLOWING INFORMATION AS REQUIRED ABOVE >

1. Facility Information - UST cleanup project where contaminated soils originated

DEQ File Number assigned to site: 03-92-125

Facility Name: MEADOWBROOK GROCERY

Facility Address: 16845 S. Hwy 211

MOLATA, OK 97038

2. Attach the completed and signed Property Owner Statements for the treatment site and the site where the soils will be placed after treatment is complete (soil disposition site).
3. Attach a written Soil Treatment Plan, using the "Aeration of Petroleum Contaminated Soils" guidance document and treatment plan form or a written report which contains all elements of the form.
4. Attach a written Soil Management Plan, using the Thermal Treatment by Mobile Unit form or a written report which contains all elements of the form.
5. Explain the need and justification for the proposed project. What other disposal or treatment options were considered and why is this the most appropriate treatment method?

CAN NOT AFFORD ANY OTHER METHOD

6. Attach a completed and signed Land Use Compatibility Statement.

SOLID WASTE LETTER OF AUTHORIZATION PERMIT APPLICATION - PAGE 2

7. You must confirm with the local authorities that the proposed treatment activity for the treatment site property location is compatible with local land use ordinances.

____ Land use approval granted and/or verified that activity is allowed

Name of Official: _____ Date: _____

Department: _____ Phone: _____

BY THE FOLLOWING SIGNATURE, THE RESPONSIBLE PARTY STATES THAT ALL INFORMATION SUBMITTED WITH THIS APPLICATION, INCLUDING ATTACHMENTS, IS TRUE AND CORRECT TO THE BEST OF YOUR KNOWLEDGE. SIGNATURE ALSO ACKNOWLEDGES THAT A LETTER OF AUTHORIZATION MAY BE SUSPENDED OR REVOKED IF THE APPLICATION CONTAINS A MATERIAL MISREPRESENTATION OR FALSE STATEMENT.

Responsible Party Name: _____ (please print)

Signature: _____

Date: _____

Note: Contractors or consultants retained by the responsible party to conduct work associated with the cleanup or soil treatment MAY NOT sign this application in lieu of the responsible party.

DETERMINE IF PERMIT FEE IS REQUIRED OR IF A FEE WAIVER IS APPROPRIATE:

The Department will waive the required permit fee if you have agreed to reimburse the Department for oversight costs associated with your UST cleanup project. If you have questions about the cost recovery process, or wish to have a Cost Recovery Agreement form mailed to you, please contact Ms. Darby Bacon at 503-229-6635 or Ms. Marcie Murphy at 503-229-5790. The Department's toll-free, call-back number is 1-800-452-4011.

- a. IF THE PERMIT FEE IS DUE: Complete the attached Fee Invoice Form and submit a check for the permit fee to the Business Office address listed.

- b. IF A PERMIT FEE WAIVER IS APPROPRIATE: Note the following as applicable:

____ A signed Cost Recovery Agreement has already been submitted to the Department on _____ (date).

____ A signed Cost Recovery Agreement is attached.

Submit this application, along with the appropriate attachments, to the DEQ Regional office that has jurisdiction for the UST cleanup project.

REMINDER - Have you:

- ____ Attached the completed and signed Property Owner Statements, for both the treatment site and the final disposition site?
- ____ Attached a written soil treatment plan?
- ____ Attached a signed/approved Land Use Compatibility Statement (if necessary)?
- ____ Attached a signed Cost Recovery Agreement (if appropriate)?
- ____ Submitted the letter authorization fee to the DEQ Business Office (if appropriate)?

PROPERTY OWNER STATEMENT

TREATMENT SITE

FACILITY INFORMATION

(UST cleanup project where soils originated)

DEQ File Number assigned to site: 03-92-125

Facility Name: MEADOWBROOK GROCERY

Facility Address: 16845 S. Hwy 211
MOHAWA, OR 97038

TREATMENT SITE INFORMATION

(location where soils will be treated)

Site Address: SAME

Tax Lot No.(s): _____ County: CLATSOP

Approximate size of property:

1 1/3 Acres: _____ or Sq. Ft: _____ or Dimensions: _____

Property Owner Name: TONI FRISON

Mail Address: 16845 S. Hwy 211
MOHAWA, OR 97038

Phone Number: 829-9145

THE PROPERTY OWNER WHERE TREATMENT WILL OCCUR MUST SIGN AND DATE THE FOLLOWING STATEMENT:

As the owner of the property listed above which is proposed to be used as a petroleum contaminated soil treatment area, I agree that only petroleum contaminated soils from the UST cleanup project listed above will be allowed to be deposited and treated on this property. I agree that this is a one-time only use of this property for this purpose. I, or a representative for me, have confirmed that this activity is compatible with local land use ordinances. I also understand that I may be jointly responsible and liable for any future problems arising from this treatment project.

Signature: Toni Frison

Date: 5-22-93

This signed statement must be included with the Soil Treatment Plan.

PROPERTY OWNER STATEMENT

FINAL SOIL DISPOSITION

FACILITY INFORMATION

(UST cleanup project where soils originated)

DEQ File Number assigned to site: 03-92-125

Facility Name: MEADOWBROOK GROCERY

Facility Address: 16845 S Hwy 211
MOLALA, OR 97038

FINAL DISPOSITION SITE INFORMATION

(Property where treated soils will be placed once treatment is complete)

Site Address: SAME

Tax Lot No. (s): _____ County: _____

Approximate size of property:

Acres: 1 1/3 or Sq. Ft.: _____ or Dimensions: _____

Property Owner Name: TONI FRISON

Mail Address: 16845 S Hwy 211
MOLALA, OR 97038

Phone Number: 829-9165

THE PROPERTY OWNER WHERE THE TREATED SOILS WILL BE DEPOSITED MUST SIGN AND DATE THE FOLLOWING STATEMENT:

As the owner of the property listed above which will receive the treated soil from the UST cleanup project also listed above once treatment is complete, I agree to ensure that the soils will be placed on my property such that they are 1) above seasonal high groundwater levels, 2) not located near wetlands or surface water, 3) not located within a 100 year floodplain, and 4) will be placed out of human contact or possible exposure. I also understand that I may be jointly responsible and liable for any future problems arising from this soil disposition activity.

Signature: Toni Frison Date: 5-22-93

This signed statement must be included with the Soil Treatment Plan.

UST CLEANUP SOIL TREATMENT PLAN REPORT FORM

Complete the following information and submit with the Solid Waste Letter Authorization application. Please print or type.

DEQ File Number assigned to site: 03-92-125

Facility where contaminated soils originated:

Responsible Party Name: TONI FRISON

Facility Name: 16845 S. Hwy 211

Address: MOHAWA, OR 97038

County: CLACKAMAS

Property where treatment of petroleum contaminated soil will occur:

Treatment Site Address: SAME

County: _____

NOTE: You must attach a signed statement from the property owner regarding use of the property for treatment of contaminated soil.

Property where treated soils will be placed once treatment is complete:

Address: SAME

County: _____

1. Describe how the treatment site was selected as appropriate for treating petroleum contaminated soil: FENCED NOT CLOSE TO ANY NEIGHBORS. COULD NOT AFFORD TO DO ANYTHING ELSE
2. Y ☒ N ☐ Is the treatment area located near (<100 feet) a wetlands, stream, or residential area?

UST CLEANUP SOIL TREATMENT PLAN - PAGE 2

3. Describe how the underlying soils, surface water, or groundwater in the treatment area will be protected from coming in contact with the contaminated soil: SOIL IS PLACED ON PLASTIC
4. Describe how surface water run-off and run-on will be controlled within the treatment area: PLASTIC UNDERNEATH AND COVERED DURING RAINY WEATHER
5. ☒ Y N Will the contaminated soil be kept covered and the cover anchored whenever it rains or treatment is not actively in progress? Who will be responsible for doing this?
TACK OR TONI FRISON
6. Describe how you will handle any leachate that collects in the treatment area: THERE IS NONE, BUT WOULD BE REMOVED AND CLEANED WITH SOIL
7. ☒ Y N Will the treatment site be completely fenced? If no, describe how adequate site security will be maintained to prevent unauthorized access to the treatment area:
8. Describe how the creation of public safety concerns, environmental hazards, or nuisance conditions (such as odors or dust) will be prevented at the treatment site: THERE IS NO ODOR - IT IS FENCED AND COVERED IN DRY WEATHER
9. Attach a sketch or drawing (does not need to be drawn to scale) of the proposed treatment area that displays:
- The location of the treatment area in relation to existing structures on the subject property and adjacent properties; indicate relative distances.
 - The size of the proposed treatment area. 1/2 ACRE
 - A brief description of the current use of both the subject property and adjacent properties.
SUBJECT PROPERTY IS A LARGE FIELD 1 ACRE
ADJACENT PROPERTIES ARE A VACANT FIELD AND ONE HOUSE OVER AN ACRE AWAY

UST CLEANUP SOIL TREATMENT PLAN - PAGE 3

10. Type of petroleum contamination (check all that apply):

☒ Gasoline ☐ Diesel ☐ Waste Oil ☐ Heating Oil ☐ Other _____

NOTE: If any waste oil contaminated soil is proposed for treatment, you must also include a copy of sample results and chain of custody forms for halogenated solvents, BTEX, and TCLP Pb, Cr, & Cd (plus PCBs as necessary).

IF YOU PROPOSE SOIL AERATION FOR ANY PETROLEUM CONTAMINATION OTHER THAN GASOLINE, YOU MUST PROVIDE WRITTEN JUSTIFICATION. PROPOSALS FOR SIMPLE AERATION OF HEAVY OIL CONTAMINATED SOIL ARE GENERALLY NOT APPROPRIATE AND MAY BE REJECTED; PROPOSALS TO AERATE DIESEL CONTAMINATED SOILS WILL BE REVIEWED ON A CASE-BY-CASE BASIS.

11. Estimated volume of soil to be treated: 32-38
(cubic yards)

12. Highest concentration of TPH detected in the excavated soil:

Value _____ TPH mg/kg By TPH-G TPH-D 418.1m (circle one)

ATTACH COPY OF ALL ANALYTICAL DATA AND CHAIN OF CUSTODY FORMS. IF ADDITIONAL PARAMETERS WERE ANALYZED (FOR THE EXCAVATED SOIL) OTHER THAN TPH, ATTACH COPIES OF THESE ADDITIONAL TEST RESULTS AND CHAIN OF CUSTODY FORMS.

13. At what depth will the contaminated soil be spread within the treatment area: _____ inches/feet. If greater than 6-12 inches, explain why:

14. Describe what method(s) will be used to enhance treatment: _____

15. Work associated with treatment enhancement will be done on the following schedule:

Once every (circle one) day/week/month/ _____ (other)

Work will be done by: _____
(company/individual)

UST CLEANUP SOIL TREATMENT PLAN - PAGE 4

16. The treatment site will be inspected on the following schedule:

Once every (circle one) day/week/month/_____ (other)

Inspections will be made by: _____
(company/individual)

17. _____ (#) discrete/composite (circle one) interim samples will be collected every week/month/quarter (circle one) to demonstrate treatment progress.

18. Interim samples will be analyzed for (circle all that apply):

TPH-G TPH-D TPH by 418.1m Other: _____

19. _____ (#) discrete final samples will be collected to determine that the contaminated soil has been successfully treated.

20. Describe how the appropriate number of interim and final samples to collect was determined: _____

21. Describe how sample locations will be chosen for all interim and final samples to be collected: _____

22. Final samples will be analyzed for (circle all that apply):

TPH-G TPH-D TPH by 418.1m Other: _____

23. It is estimated that it will take approximately _____ weeks/months (circle one) to complete the treatment based on the amount of soil to be treated, concentrations of contamination and treatment method to be used.

NOTE: If treatment will take longer than three months to complete, quarterly progress reports must be submitted.

24. The proposed final treatment level for TPH is:

_____ mg/kg TPH-G TPH-D 418.1m (circle one)

If this level is greater than the most stringent cleanup standards for gasoline or diesel contamination, explain why this level is justified (see question #33): _____

UST CLEANUP SOIL TREATMENT PLAN - PAGE 6

33. Y N It is proposed that treated soils will be reused in the original tank excavation. If yes:

Y N Was groundwater encountered or likely to be encountered?

The matrix score/level for this site is: _____/_____

34. Y N Is the final disposition site located near (<100 feet) a wetlands, stream, 100-year floodplain or residential area?

35. Is the final disposition site (check and/or circle all that apply):

- ☐ Authorized Landfill (to be used as cover)
☐ Public or private roadway (to be used as subgrade)
☐ Private property - industrial/commercial/residential

NOTE: If the treated soil will be reused as fill at any site other than the original excavation, as cover at a landfill, or as (public) road subgrade, then you must attach a statement signed by the property owner.

36. Describe how the treated soil will be managed at the final disposition site to minimize/prevent human contact and contact with groundwater or surface waters: _____

THIS PLAN WAS PREPARED BY:

Date: _____

Individual: _____ Phone: _____

Company: _____

Address: _____

NOTE: Questions about specific treatment project plans, permits and/or the forms to be used should be directed to the regional office that has jurisdiction for the UST cleanup project.

Regional Office

Phone Number (503)

Central Region	388-6146
Eastern Region	276-4063
Northwest Region	229-5263
Willamette Valley Region	378-8240
Southwest Region	776-6136

The Department's toll-free, call-back number is 1-800-452-4011.

UST CLEANUP SOIL TREATMENT PLAN - PAGE 5

25. Describe how the treated soil will be field-screened as it is moved to the final disposition site, once treatment is complete:
26. Describe what actions will be taken if further contamination is discovered during the screening process:
27. Field screening will be performed by:
Name: _____ Company: _____
28. _____ (#) discrete/composite (circle one) closure samples will be collected to determine that the area under the treatment site has not been contaminated.
29. Describe how the appropriate number of closure samples to collect was determined:
30. Describe how sample locations will be chosen for all closure samples to be collected:
31. Closure samples will be analyzed for (circle all that apply):
TPH-G TPH-D TPH by 418.1m Other: _____
32. List the name of the company and/or individual who will collect:
- _____ INTERIM (periodic) samples.
_____ FINAL (treatment) samples.
_____ CLOSURE (underneath) samples.

NOTE: All sample collection and analyses must be performed in accordance with proper sampling protocols, chain of custody, and quality assurance/quality control requirements. Samples should be collected by the Responsible Party or a licensed Soil Matrix Service Provider if licensing is required for the cleanup project.

SANIFILL NORTHWEST
Special Waste Permit Management Decision

APPROVED

Special Waste Permit No.: 2223

Permit Expiration Date: 6-24-95

Generators Name: Meadowbrook Grocery

Address of Waste Generation: 16845 S. Hwy 219

City: Medalla State: OR 97038

General Waste Description: gas cont. soil / sludge

Landfill Action: Disposal of the above described special waste is:

Approved ☒ Disapproved ☐ for disposal at Millsboro Landfill

at the disposal rate of \$ 37¹⁴ per Ton \$ _____ Per trip min/charge.

Waste Acceptance Mgr. Signature: Ellen L. Ries Date: 3-24-95

Precautions, Conditions, or Limitations on Approval: please label drum "gasoline contaminated soil/sludge" for disposal

If disapproved, reason for denial of permit: _____

Credit/Billing Information

Accept _____ Reject _____ By: _____

Comments: payment = cash or VISA

Landfill Account No. _____

341897

Hillsboro Landfill Inc.

Subsidiary of Sanifill, Inc.

Scale House - LAN # 2

TRANSACTION # 853126 Acct# < 1>
 Account: CASH ACCOUNT
 Loop Tag 80

---In--- ---Out---
 Date 04-05-95 04-05-95
 Time 13:38 13:51
 Scale Op DWP LJR
 lbs tons

C2
 DIR: IN
 OnS: 13
 SITE: P2

Transtn Type= 2/DISPOSAL - Cash
 Payment Type= 2/Cash
 Vehicle Type=13/Pickup
 Origin Type= 7/Clackamas -- IN
 Materl. Type= 3/Soils
 Destin. Type= 1/Hillsboro Landfill

P#

Gross Wt 6,680 3.34 Scale # 12/A
 Tare Wt 6,540 3.27 Scale # 13/B
 Net Wt 140 0.07 TN

Rate \$ 57.86/TN
 Tip Fee \$ 50.00
 Spec Fee \$ 0.00

Permit# P#2223
 Amt Tend \$ 50.00 Change \$ 0.00

Total Fee \$ 50.00

Meadowbrook Grocery
16845 S. Hwy 211
Molalla, Or. 97038

Mr. Rich Rose
D.E.Q.
1500 S.W. First Ave. Suite 750
Portland, Or. 97201-5884

Dear Sir:

As you are a new clean up specialist assigned to Meadowbrook Grocery, I would like to take the time to explain our situation.

In May of 1992, Robert Montgomery Development, hired by Ace Tank and Equipment removed three gasoline storage tanks from the ground at Meadowbrook Grocery. The ground was found to have contamination, I would like to tell you how it got there. There were no holes in the tanks until Montgomery Development broke one tank, he also spilled gasoline into the pit, and all over the ground trying to pour gasoline and sludge into a 55 gallon drum. This was witnessed by an employee. I returned shortly after the tank was pulled and the smell of gasloine was so strong my employee was ill.

Mr. Montgomery said there was ground water that he purged onto the contaminated soil pile. This is totally untrue as I was there and he may have taken a sample, but after he spilled gas into the pit and he did not purge water as he stated because I watched him. He also says the soil samples were taken in sterile glass jars with teflon lids, this is an out and out lie. He asked me for three plastic garbage bags, which he put the soil in and left in my cooler for several hours. He also states there were no holes in the tanks at the disposal site, which is not true because one tank was almost in half due to his breakage. We have asked Montgomery Development repeatedly to produce receipts from his disposal site which he has not produced. Upon examination at the disposal site it would have proven he ruptured the tank. We requested these reports again May 20, 1993 from Ace Tank and Montgomery Development and still have not received an answer or response.

When we called Mr. Montgomery regarding all of these problems he denied all of it and said the tank that was not and had not been used for five years was never connected to the island, but in his report he says that tank was connencted to the pumping island. His excuse for the gas being in the ground was that the tank pipe was not connected to the island and that it leaked from that pipe. It is our total belief that contamination was due to a spill and not leakage.

The soil was removed and is now on black plastic located on my property, enclosed by a fence. It is covered with plastic in winter and turned once a month. The soil is uncovered in dry weather. No run-off or contamination has occured.

As to ground water, we have had our well tested two times in the last year for gasoline, and as you can see by the results there is no gasoline in our well. We are the only drinking water source within one and one third acres. We are not contaminatin anyone. We will continue to monitor our well two times a year.

Our plan for the soil is to get samples taken to prove it is clean, and to spread it out right where it is. We cannot afford to do anything else. As far as a \$500.00 fee for keeping the soil here it was not required at the time the soil was placed here and we were told by D.E.Q. that it was okay to have the soil on our property. Shelia Monroe explained we needed to put it on plastic and to cover and turn it, nothing was said about a permit. Our test will prove that the soil is clean and not hurting anyone.

As for the ground water, we cannot afford to do anything about it. We cannot afford monitoring wells or pumps or any of the options given. The water was contaminated by a spill, and we will continue to monitor our well as we are the only water source close by.

I cannot borrow the money to do what you suggest, as no one will loan the money to me while there is a problem with D.E.Q.. I cannot sell the store as there is a problem with D.E.Q. I cannot pay the state to clean up as I can just barely pay my obligations now. If the state takes action to clean up and puts a lean on my store it will put my in direct violation of my contract, and I will lose my store and my home.

I am willing to do whatever I can to solve this problem, but there is no money. I will take soil samples and pay the \$250.00 for testing. I will remove the 55 gallon drum or have it removed and taken to an authorized center. After that, there is nothing else I can do at this time and do not see in the near future when I could. If funds become available to me, I will do whatever I can to correct any problem that is left.

I will send the results of the soil samples as soon as I get them. I will also send a receipt showing the disposal of the 55 gallon drum of sludge.

Thank you for considering my letter, it is not my intention to ignore these issues, but lack of funds gives me no choice but to take it one step at a time as finances allow.

Sincerely,

Toni Frison,
owner Meadowbrook Grocery