



# Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

November 9, 2022

Easy Mart  
Attn: Sukhbir Banwait  
1321 Main St  
Oregon City, OR 97045

RE: UST Compliance Inspection  
**DEQ USTs #988**  
Easy Mart

Dear Sukhbir Banwait,

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

**The inspection for this facility is scheduled for Thursday December 8, 2022. The inspection will start at approximately 1:30 pm located at 1321 Main St in Oregon City.**

**Please read this entire notice and contact the DEQ inspector if you have questions about the upcoming inspection.**

You must contact the inspector at least two (2) weeks prior to the date above to reschedule if you are unavailable at the stated time. Failure to reschedule within this time frame may result in enforcement actions.

The inspections will require uninterrupted participation and attendance by you or a knowledgeable assistant. For the inspections you need to provide access to tank sumps, under dispenser areas, cathodic protection rectifiers, and leak monitoring equipment. DEQ will not touch the equipment or enter the facility; **if you are unable to assist with equipment access, please have your UST Service Provider there.** This inspection may also include review of Stage I Vapor Recovery.

The DEQ requests the following documentation be submitted electronically prior to the inspection to [lauren.dimock@deq.oregon.gov](mailto:lauren.dimock@deq.oregon.gov). If these records cannot be submitted prior to the inspection, please have them available for review at the facility.

- Line and leak detector testing results for the past three years,
- Monthly tank leak detection records for the past 12 months,
- Class A, B, and C training documentation,
- Financial responsibility mechanism,
- Annual tank gauge certification,
- Spill prevention testing records,
- Monthly walkthroughs for the past 12 months,
- Overfill Prevention Equipment testing,
- Cathodic protection testing (if applicable).

Upon request, the DEQ inspector may allow up to five (5) days after the inspection to accept missing documents prior to making a final compliance determination. Any records submitted after an approved five (5) day extension will not be included for compliance determination and the inspection will be considered closed.

As stated previously, DEQ will not touch any equipment and if you are unable to assist with equipment access, please have your UST Service Provider there to remove manway or sump lids. DEQ will need to observe what equipment is in the tank top sumps and under the dispensers. If ball floats are the primary overfill protection device, these will need to be verified during the inspection, please be able to locate and remove the ball floats.

If violations are found at the time of the inspection without prior notification, DEQ is required to initiate enforcement action. For UST violations, enforcement usually begins with a field citation option, which is much like paying a traffic ticket and making corrections. Some enforcement situations, including repeat violations and significant compliance deficiencies, will go through a longer and more formal process through the Office of Compliance and Enforcement and can potentially lead to larger penalties.

Thank you for your cooperation. I can be reached at 503-229-6030 or [lauren.dimock@deq.oregon.gov](mailto:lauren.dimock@deq.oregon.gov) to answer any questions you may have and assist you in the preparation for your inspection.

Sincerely,

A handwritten signature in black ink that reads "Lauren Dimock". The signature is written in a cursive style with a large, sweeping flourish at the end.

Lauren Dimock  
UST Compliance Specialist  
Northwest Region



Oregon Department of Environmental Quality - Underground Storage Tank Program  
 Technical Compliance Rating - UST Inspection Report

Inspection conducted by Dinnock Date 12/6/22 Time 1:30 Facility 988

Facility Name: <u>Easy Mart (76)</u>		Permittee: <u>Sukhbir Banwait</u>	Contact: <u>Sukhbir Banwait</u>
Site Address: <u>1321 Main St</u>		Organization: <u>Easy Mart</u>	Phone: <u>503-656-7573</u>
City: <u>Oregon City</u>	County: <u>Clatsamas</u>	Phone: <u>←</u>	<u>unable to leave vm</u>

Tank Information

DEQ #	<u>AFFJD</u>	<u>AFFJE</u>		
Substance	<u>Gasoline</u>	<u>→</u>		
Est. Gallons	<u>10K</u>	<u>10K</u>		
Tank Material	<u>FRP</u>	<u>→</u>		
Tank Install Date	<u>1982</u>	<u>→</u>		
Pipe Material	<u>FRP</u>	<u>→</u>		
Pipe Type	<u>Pressure</u>	<u>→</u>		
Pipe Install Date	<u>1982</u>	<u>→</u>		
Overfill Device	<u>ASD</u>	<u>→</u>		

Notes:

Operating Certificate Current  Accurate  Posted

Operator Training:

Class A/B Operator:  Y  N  
 Class C Operators:  Y  N

Name: Sukhbir Banwait

Compliance:  Y  N  
 Date: 5/1/06

Financial Responsibility:

Financial Responsibility: Begin Date: 4/28/22 End Date: 4/28/23  
 Coverage amount correct?  Y  N # tanks covered? 2

Compliance:  Y  N

Notes:

**Spill Prevention:**

Compliance: Y **N**

Spill bucket tested every three years? **Y** N

Last testing date: 8/26/21 + 12/13/22

Spill bucket present and functional? **Y** N

Visible Damage to Spill Bucket: Y **N**

Did spill prevention pass test? Y **N**

If not, was equipment repaired or replaced and retested? Y N

If monitoring interstice monthly instead of every 3 years, is there a monthly inspection of inner and outer wall of spill bucket?

(Records must be maintained for as long as the spill bucket is using periodic monitoring)

**Notes**

2021 - Premium bucket failed  
Montgomery replaced, full cycle re-tested  
\* need passing result

OAR 340-150-0310 (5)(a and b) requires that the ullage in the tank is greater than the deposited about and a procedure needs to be developed so that UST is constantly being monitored to prevent overfill and spilling

**Overfill Prevention**

Compliance: Y **N**

Check all that are present: Alarm  Flapper  Ball Float

Overfill Alarm:

Alarm sounds when tank is 90% full? **Y** N

Driver can see or hear alarm at point of transfer? **Y** N

Verified alarm during inspection? **Y** N

Flapper Valve:

Proof that valve automatically shuts off the delivery at 95% full? Y N

Flapper valve been tampered with? Y N

Visual observation of flapper in the fill pipe to look for damage? Y N

Ball Float:

Proof that ball float restricts flow when tank is 90% full? Y N

Verify ball float is present during inspection? Y N

(Ball floats not allowed with some Stage I equipment and suction piping systems.)

Overfill inspected within last 3 year? **Y** N

Overfill device inspection date: 7/17/22

If overfill device inspection failed was it repaired was it replaced and retested? Y N

**Notes:**

Release Detection:

Compliance:  Y  N

**A) ANNUAL TEST OF RELEASE DETECTION SYSTEM**

Tank Gauges:

Alarm tested, system configuration verified, and battery backup tested

Probes and Sensors:

Inspected for residual buildup, ensured floats move freely, ensured shaft is not damaged, ensured cables are free of breaks, alarm operability tested

Date of Last Test 7/17/02

Last 3 annual Tank Monitoring Certifications available?

Y  N

**B) MONTHLY TANK RELEASE DETECTION**

Tank Gauge  VR

Are correct tank sizes programmed in tank gauge?  Y  N

Are tanks manifolded?  Y  N

If so, tank gauge testing setup for manifolded tanks?  Y  N

Size of tank meets equipment limitations?  Y  N

Tank diameter/length seem appropriate?  Y  N

Interstitial Monitoring

Monthly records must include, date system was checked, observations made, initials of person checking. Electronic records must include power status (on or off), alarm indication status (yes or no) and sensor malfunction notes (yes or no).

SIR

Ensure pass or fail results within 30-day period. Inconclusive result means release detection requirement not met

*If Veeder Root*  
 If CSLD is Pd 99%?  Y  N  
 CSLD requires tank to be 15% full for a valid test.  Y  N  
 Thermal Coefficient Correct?  Y  N  
 (Gasoline 0.00070; Diesel 0.00045)

*If Franklin*  
 If SCALD is Vol. Qualify 14%?  Y  N  
 API Gravity correct?  Y  N  
 (Regular 63.5; Plus 62.8; Super 51.3 Diesel 32.8)

**BOTH**  
 Static tests require tank to be 50% full for a valid test

Typical Tank Leak Test Time:  
 6,000 gal UST 3 hours test time  
 8,000 gal UST 4 hours test time  
 10,000 gal UST 5 hours test time  
 12,000 gal UST 6 hours test time

Tank 1	Jan <input checked="" type="checkbox"/>	Feb <input checked="" type="checkbox"/>	Mar <input checked="" type="checkbox"/>	Apr <input checked="" type="checkbox"/>	May <input checked="" type="checkbox"/>	Jun <input checked="" type="checkbox"/>	Jul <input checked="" type="checkbox"/>	Aug <input checked="" type="checkbox"/>	Sep <input checked="" type="checkbox"/>	Oct <input checked="" type="checkbox"/>	Nov <input checked="" type="checkbox"/>	Dec <input checked="" type="checkbox"/>
Tank 2	Jan <input checked="" type="checkbox"/>	Feb <input checked="" type="checkbox"/>	Mar <input checked="" type="checkbox"/>	Apr <input checked="" type="checkbox"/>	May <input checked="" type="checkbox"/>	Jun <input checked="" type="checkbox"/>	Jul <input checked="" type="checkbox"/>	Aug <input checked="" type="checkbox"/>	Sep <input checked="" type="checkbox"/>	Oct <input checked="" type="checkbox"/>	Nov <input checked="" type="checkbox"/>	Dec <input checked="" type="checkbox"/>
Tank 3	Jan <input type="checkbox"/>	Feb <input type="checkbox"/>	Mar <input type="checkbox"/>	Apr <input type="checkbox"/>	May <input type="checkbox"/>	Jun <input type="checkbox"/>	Jul <input type="checkbox"/>	Aug <input type="checkbox"/>	Sep <input type="checkbox"/>	Oct <input type="checkbox"/>	Nov <input type="checkbox"/>	Dec <input type="checkbox"/>
Tank 4	Jan <input type="checkbox"/>	Feb <input type="checkbox"/>	Mar <input type="checkbox"/>	Apr <input type="checkbox"/>	May <input type="checkbox"/>	Jun <input type="checkbox"/>	Jul <input type="checkbox"/>	Aug <input type="checkbox"/>	Sep <input type="checkbox"/>	Oct <input type="checkbox"/>	Nov <input type="checkbox"/>	Dec <input type="checkbox"/>
Tank 5	Jan <input type="checkbox"/>	Feb <input type="checkbox"/>	Mar <input type="checkbox"/>	Apr <input type="checkbox"/>	May <input type="checkbox"/>	Jun <input type="checkbox"/>	Jul <input type="checkbox"/>	Aug <input type="checkbox"/>	Sep <input type="checkbox"/>	Oct <input type="checkbox"/>	Nov <input type="checkbox"/>	Dec <input type="checkbox"/>

Release Detection Continued:

C) PIPING RELEASE DETECTION

Pressure Piping

Mechanical Leak Detector (MLLD)  Electronic Leak Detector (ELLD)

Manufacturer/Model: LD 2000

MLLD on turbine head?  Y  N

MLLD is product appropriate? (Example, diesel Red Jacket FX series on diesel system)  Y  N

ELLD have a console inside the office? ELLD connected and tests performed?  Y  N

If ELLD and no line testing: Annual 0.1 gph results from tank gauge  Y  N

Number of LLD tested? 2 Number of lines tested? 2

Last 3 line and leak detector tests available?  Y  N Date of last test: 7/17/22

7/18/21  
6/21/20

Interstitial Monitoring

Monthly records must include, date system was checked, observations made, initials of person checking. Electronic records must include power status (on or off), alarm indication status (yes or no) and sensor malfunction notes (yes or no).

Jan  Feb  Mar  Apr  May  Jun  Jul  Aug  Sep  Oct  Nov  Dec

Last two sump tightness tank records available?  Y  N Dates of last test: \_\_\_\_\_

Yearly testing of sensors?  Y  N Dates of last test: \_\_\_\_\_

Visual inspection of tank top?  Y  N Float sensors installed correctly?  Y  N

Presence of water in the sumps?  Y  N Rubber boots or access port open at turbine?  Y  N

Safe Suction

Check valve directly below suction pump?  Y  N

Notes:

**Walkthrough Requirements**

**Compliance:**  Y  N

*Monthly:*

Spill prevention equipment visually checked?  Y  N

Visually check for damage, remove liquid or debris, check for and remove obstructions in the fill pipe, check the fill cap to make sure it is securely on the fill pipe, and, for double walled spill prevention equipment with interstitial monitoring, check for a leak in the interstitial area. (If the UST system is receiving deliveries at intervals greater than every 30 days, the permittee must conduct an inspection prior to each delivery)

Release detection equipment checked?  Y  N

Check to make sure the release detection equipment is operating with no alarms or other unusual operating conditions present; and ensure records of release detection testing are reviewed and current

Last 12 months of records?  Y  N

*Annual:*

Sumps visually checked for damage?  Y  N      Last three years of records available?      Y  N

Date of last test: \_\_\_\_\_

**Notes:**

**Corrosion Protection**

**Compliance:** Y  N

Cathodic Testing

Steel Tanks w/CP? Y  N       Steel Pipes w/CP? Y  N       Steel Flex-lines w/CP?      Y  N

Date of Last C.P. Test: \_\_\_\_\_      Last Two C.P. Test Records Available?      Y  N

C.P. System repaired?      Y  N       Date of Repair: \_\_\_\_\_

C.P. Tested within 6 months of repair?      Y  N

If Impressed Current System:

Rectifier operational?      Y  N

Rectifier Log Maintained:      Y  N       Hour Reading: \_\_\_\_\_

Rectifier been operating continuously?      Y  N

Metal components tank and dispenser are isolated, or booted, or cathodically protected, or not in contact with soil?

Tank Lining

Date of Last Lining Inspection: \_\_\_\_\_      Pressure test conducted after tank lining inspection?      Y  N

**Notes:**

General Notes of Inspection / Site Sketch:

Patriot  
spill - Full cycle Envi

Water in premium sump

Banwait 4205 @ COMCAST.NET

Issued: FC# \_\_\_\_\_ or Compliance Letter

(WL) 7908

Inspector's Signature AD

Date: 12/14/22





Oregon Department of Environmental Quality - Underground Storage Tank Program  
Technical Compliance Rating - UST Inspection Report

Inspection conducted by D. Dinnick Date 12/8/22 Time 1:30 Facility 988

Facility Name: Easy Mart Permittee: Sukhbir Banwait Contact: Sukhbir Banwait  
 Site Address: 1321 Main St Organization: Easy Mart Phone: 750 3-650-7573  
 City: Oregon City County: Clatsop Phone: mobile to leave VM

Tank Information	
DEQ #	<u>AFFJD AFFJE</u>
Substance	<u>Gasoline</u> →
Est. Gallons	<u>10K</u> <u>10K</u>
Tank Material	<u>FRP</u> →
Tank Install Date	<u>1982</u> →
Pipe Material	<u>FRP</u> →
Pipe Type	<u>Pressure</u> →
Pipe Install Date	<u>1982</u> →
Overfill Device	<u>ABD</u> →

Notes:

Operating Certificate Current  Accurate  Posted

Operator Training: Compliance: Y N  
 Class A/B Operator: Y N Name: Date:  
 Class C Operators: Y N

Financial Responsibility: Compliance: Y N  
 Financial Responsibility: Begin Date: 4/28/22 End Date: 4/28/23  
 Coverage amount correct? Y N # tanks covered? 2

1:

SITE NAME: Easy Mart 76  
 CONTACT/CLIENT: Basmati  
 SITE ADDRESS: 1321 Main St, Oregon City, OR 97045  
 PHONE NUMBER: 503-656-7173  
 FACILITY ID: 988  
 TEST DATE: 8-6-23  
 TESTER & CERT #: Roger Edens 27458  
 WEATHER: clear

**Full Cycle Environmental - Hydrostatic Sump Test**

Location	Unneeded Spill Bucket	Location	Premium Spill Bucket
Pass/Fail	<u>Pass</u>	Pass/Fail	<u>Fail</u>
Method	<u>Spill Bucket Hydro PEI RP 1200 6.2</u>	Method	<u>Spill Bucket Hydro PEI RP 1200 6.2</u>
Start Time	<u>8:30</u>	Start Time	<u>9:30</u>
Finish Time	<u>10:30</u>	Finish Time	<u>10:30</u>
Start Level	<u>8 1/4</u>	Start Level	<u>9</u>
Finish Level	<u>8 3/4</u>	Finish Level	<u>1 1/2</u>

Methods: New Install PEI RP 100 8.5.4, Spill Bucket Hydro PEI RP 1200 6.2, Sump PEI RP 1200 6.5, Sump Low Level PEI RP 1200 6.6, TS-SIS PEI RP 1200 6.7

2:



3:



4:



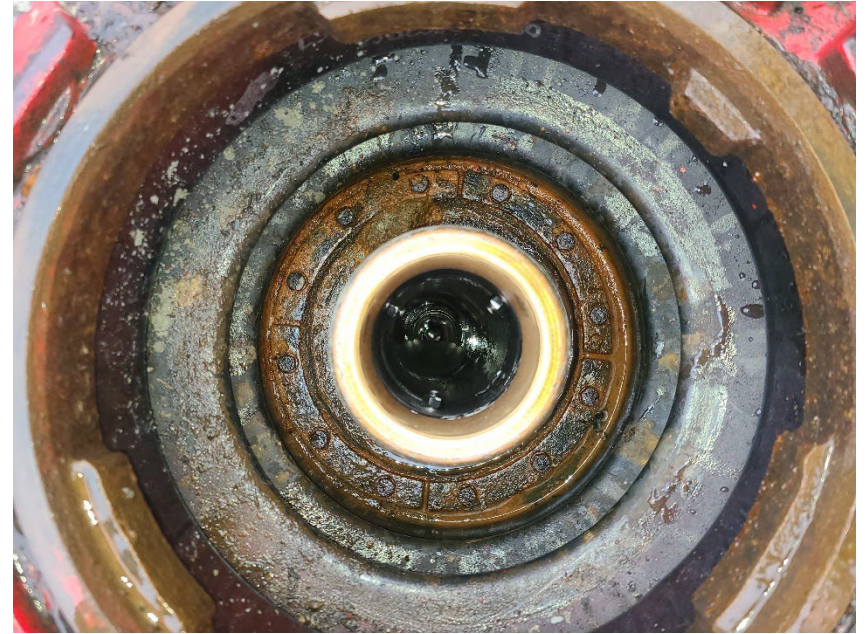
5:



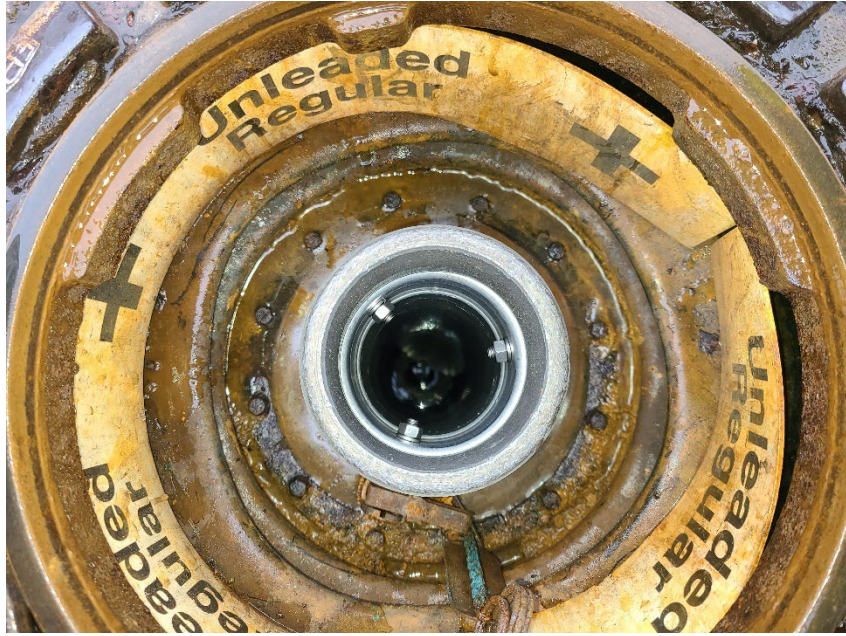
6:



7:



8:



9:



10:



11:



# Oregon

Kate Brown, Governor

## Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

December 14, 2022

Easy Mart  
Attn: Sukhbir Banwait  
1321 Main St  
Oregon City, OR 97045

**RE: Warning Letter**

Easy Mart  
2022-WL-7908  
Facility ID Number #988  
Clackamas County

Dear Sukhbir Banwait:

The Oregon Department of Environmental Quality (DEQ) conducted an Underground Storage Tank compliance inspection at the facility located at 1321 Main St in Oregon City, Oregon on December 8, 2022. The purpose of this letter is to inform you of the result of the inspection.

Based upon the inspection of your facility, DEQ has concluded that Easy Mart is responsible for the following violation of Oregon environmental law:

**VIOLATIONS:**

- (1) **Failure to complete initial overfill and spill prevention testing requirements by October 1, 2020** (Class I. OAR 340-150-310(10)). The initial overfill prevention testing was completed on July 17, 2022, and the initial spill prevention testing was completed on August 26, 2021.

Class I violations are considered to be the most serious violations; Class III violations are considered to be the least serious.

This notice is a warning letter. DEQ does not intend to take formal enforcement action at this time. However, should you repeat any of these violations, the matter may be referred to the DEQ's Office of Compliance and Enforcement for formal enforcement action, including assessment of civil penalties and/or a Department order. Civil penalties can be assessed for each day of violation.

If you believe any of the facts in this Warning Letter are in error, you may provide information to me at the office at the address shown at the top of this letter. DEQ will consider new information you submit and take appropriate action.

DEQ endeavors to assist you in your compliance efforts. Should you have any questions about the content of this letter, please feel free to contact me in writing at [lauren.dimock@deq.oregon.gov](mailto:lauren.dimock@deq.oregon.gov) or by phone at 503-229-6030.

Sincerely,

A handwritten signature in black ink that reads "Lauren Dimock". The signature is written in a cursive style with a large, looping initial "L".

Lauren Dimock  
UST Compliance Specialist  
Northwest Region