



# Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

July 25, 2024

Robert Marble  
U.S. BanCorp  
17650 NE Sandy Blvd  
Portland, OR 97230-5000

RE: UST Compliance Inspection  
DEQ UST #10784  
US Bank Operations Center

Attention Mr. Marble,

The Oregon Department of Environmental Quality (DEQ) is conducting underground storage tank (UST) inspections throughout Oregon. The purpose of this letter is to inform you that your facility, among others, has been selected for inspection. A thorough inspection of your facility will be conducted to determine compliance with state and federal UST requirements. **The 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.

**If I do not hear from you, the inspection for this facility is scheduled for August 27, 2024, starting at approximately 9 am.** Please note that the inspection will require uninterrupted participation and attendance by you or a knowledgeable assistant. For the inspection 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.

To complete this inspection, you will need to have compliance testing records available on-site on the day of the inspection or sent to me prior to the inspection at [mark.drouin@deq.oregon.gov](mailto:mark.drouin@deq.oregon.gov). If the records are not available during the day of the inspection, you will have five (5) business days to provide the records to me electronically. After which time this facility will be subject to enforcement actions.

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

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

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 will go through a longer and more formal process including civil penalties.

Thank you for your cooperation. I can be reached at 541-213-1204 or [mark.drouin@deq.oregon.gov](mailto:mark.drouin@deq.oregon.gov) to answer any questions you may have and assist you in the preparation for your inspection.

Sincerely,

*Mark Drouin*

Mark Drouin  
UST Compliance Specialist

# Full Compliance Inspection - Test

Submitted by: mark.drouin\_deq

Submitted time: Sep 4, 2024, 10:30:48 AM

Facility Number

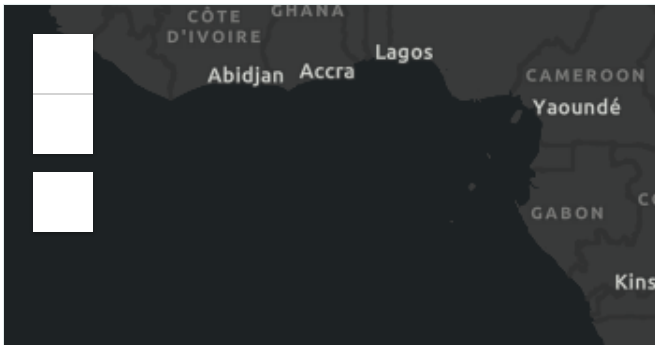
**10784**

Address

**17650 Northeast Sandy Boulevard, Portland, OR, 97230**

Map

**Lat: 0 Lon: 0**



Esri, TomTom, Garmin, FAO, NOAA, USGS

Powered by Esri

Date

**Sep 4, 2024**

Time

**09:14**

Compliance Determination

Corrosion Protection or Lining

**Pass**

Spill Prevention

**Fail**

Overfill Prevention

**Fail**

Release Detection

**Fail**

Operator Training

**Pass**

Financial Responsibility

**Pass**

Walkthrough Requirements

**Pass**

Passing Inspection

**Fail**

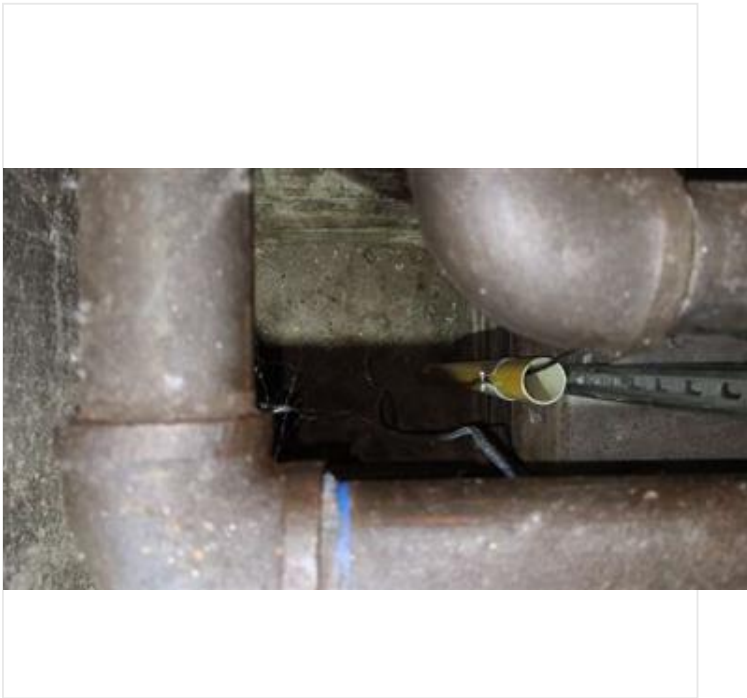
Photos



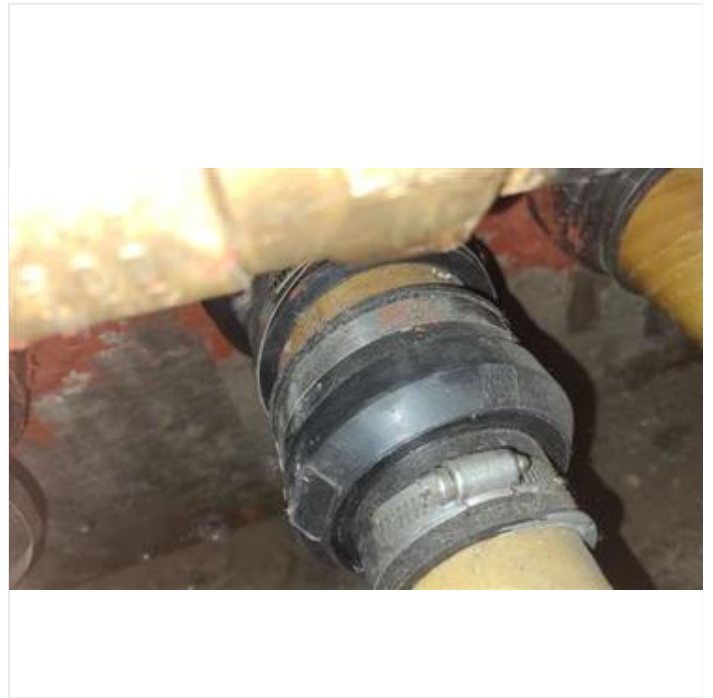
Facility\_10784\_240904101458\_stp-sci.jpg



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Facility\_10784\_240904095337\_trench3.jpg



Facility\_10784\_240904095229\_trench2.jpg



Facility\_10784\_240904092543\_001.jpg



Facility\_10784\_240904092543\_002.jpg





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Program Enforcement No. 2024-FC-9541

Department of Environmental Quality  
Underground Storage Tank Program

Field Citation  
For UST Violations

This section for  
DEQ use only

Page 1 of 3

DEQ Information		UST Facility Information	
Inspection Date:	09/17/2024	Facility ID#:	10784
Inspector:	Mark Drouin	Facility Name:	US BANK OPERATIONS CENTER
DEQ Office:	700 NE Multnomah St. #600 Portland, Oregon 97232	Facility Address:	17650 NE SANDY BLVD, PORTLAND, Oregon 97230
Phone #:	503-229-6155	County:	Multnomah

Oregon DEQ inspected the facility listed above and identified the UST violations listed on page 3 of this Field Citation.

Field Citation Issued:	<input type="checkbox"/> In Person <input checked="" type="checkbox"/> By Mail <input type="checkbox"/> Both	Date Issued: 09/17/2024
Facility Representative Present During Inspection:	<input type="checkbox"/> Permittee <input type="checkbox"/> Owner <input type="checkbox"/> Other	
Name of Permittee or Owner:	U.S. BanCorp	
Mailing Address:	17650 NE Sandy Blvd , Portland Oregon 97230	

**Field Citation Penalty – See Page 3 for detailed listing of each violation.** \$ 1400

**Check payable to: DEQ Financial Services LBX3615; P.O. Box 3615; Portland OR 97208-3615**

This Field Citation is issued in accordance with the requirements for the expedited enforcement of underground storage tank (UST) violations, OAR 340-150-0250.

**Owner or Permittee should select Option 1 or Option 2 below**

**and return a signed copy of this for to DEQ by the following date: 10/17/24**

DEQ Revenue Section  
700 NE Multnomah St. #600  
Portland, Oregon 97232

**Check one option**

- Option 1** - I acknowledge that the listed violation(s) have occurred and I am remitting the listed field citation penalty.
- Option 2** - I do not want to participate in the expedited enforcement process and understand that my file will be referred to the Department's Office of Compliance and Enforcement for formal enforcement action.

Name:	Owner / Permittee
Signature:	Date:

**Important**

Read pages 2 and 3 for more information about your options and a detailed listing of violations and compliance requirements.



## **Field Citation Requirements**

The permittee or owner should select Option 1 or Option 2 and return a signed copy of Page 1 of the Field Citation form within thirty (30) days of issuance of the Field Citation. If the permittee or owner fails to sign and send Page 1 of the Field Citation form back or pay the penalty within thirty days, Option 1 expires, the Field Citation will serve as a Pre-Enforcement Notice (PEN) and the permittee and owner will be subject to formal enforcement including the imposition of civil penalties in accordance with OAR Chapter 340, Division 12.

The permittee or owner must complete the actions required to correct the violations listed on the Field Citation by the date specified to prevent further enforcement action by DEQ.

### **Option 1:**

By checking Option 1 the permittee or owner acknowledges that the violations listed on Page 3 of this Field Citation have occurred and agrees to pay the established penalty.

By submitting payment of the penalty amount, the responding permittee or owner agrees to accept the field citation as a final order of the Environmental Quality Commission (commission) and waives any and all rights and objections to the form, content, manner of service and timeliness of the Field Citation; to a contested case hearing and judicial review of the Field Citation [OAR 340-150-0250(6)]; and to service of a copy of this Final Order (*i.e.*, no other copy will be provided).

Upon the Department's receipt of payment of the penalty amount set forth in the Field Citation, the Field Citation becomes a Final Order of the Commission that:

1. Imposes upon the permittee or owner a civil penalty in the amount listed on Page 1 of this Field Citation; and
2. Requires the permittee or owner to satisfactorily complete the requirements and actions necessary to correct the violations documented by the dates set forth on Page 3 of this Field Citation.

Failure by the permittee or owner to complete the actions set forth on Page 3 of the Field Citation by the specified date violates the Commission Order and subjects the permittee and owner to a formal enforcement action including the imposition of additional civil penalties.

### **Option 2:**

The permittee or owner may deny that the violations as listed on Page 3 of this Field Citation have occurred or contest the Field Citation process by checking Option 2 and submitting to the Department a signed copy of Page 1 of the Field Citation. In that event, the Field Citation will serve as a Pre-Enforcement Notice (PEN) and the permittee and owner will be subject to formal enforcement for those violations set forth in the Field Citation, including the imposition of civil penalties in accordance with OAR Chapter 340, Division 12. Civil penalties that will be imposed by the formal enforcement process will exceed the Field Citation penalties for the same violation(s).

**The Department appreciates your cooperation and efforts to comply with the regulations for underground storage tank systems.**

DATE ISSUED: 09/17/2024

PROGRAM ENFORCEMENT No.: 2024-FC-9541

FACILITY ID: 10784

Page 3 of 3

**Violation #1:** **Failure to conduct annual operability testing of the release detection system (tank gauge, probes, and sensors).**  
**\*TCR:**

Corrective Action: Conduct annual release detection operability testing (leak detectors, tank top sump and trench sensors, tank interstitial sensors, tank probes) and submit results to the DEQ by 11/17/24

Rule Citation: <b>OAR 340-150-0400(1)(c) 340-150-0400(2)</b>	Penalty Amount: \$ 300	Correct Violation by: 11/17/2024	Date Violation Corrected:
--	------------------------	----------------------------------	---------------------------

**Violation #2:** **Failure to test spill prevention and containment sumps equipment at least once every 3 years**  
**\*TCR:**

Corrective Action: Conduct triennial testing of the spill buckets and tank top sumps and submit records to DEQ by 11/17/24

Rule Citation: <b>OAR 340-150-0310(8)(b)</b>	Penalty Amount: \$ 500	Correct Violation by: 11/17/2024	Date Violation Corrected:
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**Violation #3:** **Failure to inspect overfill equipment at least once every 3 years.**  
**\*TCR:**

Corrective Action: Triennial testing of the overfill alarm (this will be conducted when the probes are removed) and submit documents to DEQ by 11/17/24

Rule Citation: <b>OAR 340-150-0310(9)</b>	Penalty Amount: \$ 300	Correct Violation by: 11/17/2024	Date Violation Corrected:
---	------------------------	----------------------------------	---------------------------

**Violation #4:** **Failure to perform an annual test of operation of line leak detector.**  
**\*TCR:**

Corrective Action: Conduct annual testing of the tank probes and submit records to DEQ by 11/17/24

Rule Citation: <b>OAR 340-150-0410(2)(c-)</b>	Penalty Amount: \$ 300	Correct Violation by: 11/17/2024	Date Violation Corrected:
---	------------------------	----------------------------------	---------------------------

**Violation #5:**  
**\*TCR:**

Corrective Action:

Rule Citation: <b>OAR</b>	Penalty Amount: \$	Correct Violation by:	Date Violation Corrected:
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**Violation #6:**  
**\*TCR:**

Corrective Action:

Rule Citation: <b>OAR</b>	Penalty Amount: \$	Correct Violation by:	Date Violation Corrected:
---------------------------	--------------------	-----------------------	---------------------------

Total Penalty Amount	\$1400
(This Page): \$	

**YOU MUST CORRECT THE VIOLATIONS AS REQUIRED, ENTER THE DATES CORRECTED, SIGN THE STATEMENT BELOW AND RETURN THIS FORM TO THE DEQ INSPECTOR LISTED ON PAGE 1 ON OR BEFORE: 11/17/2024**

Retain a copy of this form and all documentation of corrective actions for your records.

I hereby certify that the UST violations noted above have been corrected: \_\_\_\_\_/\_\_\_\_\_

Permittee/Owner Signature

Date

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

Inspector: MD Brown Date: 9/4/2024 Time: 9A Facility: 18784

I. Site Information		
Facility Name: <u>US Bank Operations</u>	Permittee: <u>Robert Marble</u>	Contact
Site Address: <u>17650 NE Sandy Blvd</u>	Organization: <u>US Bank Corp</u>	Phone
City: <u>PORTLAND</u>	Phone: <u>503 401 4790</u>	

II. Tank Information					
DEQ Permit #	<u>BHGDK</u>	<u>BAGDA</u>			
Estimated Gallons	<u>30,000</u>	<u>30,000</u>			
Substance	<u>Diesel</u>	<u>Diesel</u>			
Tank Material	<u>DW FRP</u>	<u>→</u>			
Tank Install Date	<u>2020</u>	<u>→</u>			
Pipe Material	<u>DW FRP</u>	<u>→</u>			
Pipe Type					
Pipe Install Date	<u>2020</u>	<u>→</u>			
Overfill Device					

Notes and Comments from the UST database:  Check file before conducting inspection

If tanks are manifolded, which tanks:

III. Operating Certificate	Compliance	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<input checked="" type="checkbox"/> Current <input checked="" type="checkbox"/> Accurate <input checked="" type="checkbox"/> Posted for delivery drive to observe			

IV. Operator Training	Compliance	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Class A/B Operator <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Name: <u>James Emanuelson</u> Date: <u>6/1/2022</u>			
Class C Operator <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Egen <input type="checkbox"/> Cardlock			

V. Financial Responsibility	Compliance	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Type of coverage: <u>Insurance</u> Begin Date: <u>5/1/2024</u> End Date: <u>5/1/2025</u>			
Coverage amount correct: <u>yes</u> Number of tanks covered: <u>2</u>			
Financial responsibility could also be in the form of self insurance, bonds, local government, trust fund, and or guarantee			

VI. Walkthrough Requirements	Compliance	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Spill prevention and release detection equipment checked monthly?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Tank top sumps checked annually?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

**VII. Release Detection**

**Compliance**

Yes  No

**a) Annual Release Detection Operability Testing**

(Ensure all release detection probes and sensors were tested)

*Testing done @ startup - not since then*

Date of last testing: \_\_\_\_\_

Last three tests available?  Yes  No

Sensors/Probes Tested:  Tank Top  UDCs  Annular  In-Tank

Tank gauge manufacturer make and model: Veeder Root 450

In-Tank Gauging Probe: \_\_\_\_\_

Annular Tank Sensor: \_\_\_\_\_

Tank Top / Dispenser Sensor: Veeder Root 794380-350

**b) Piping Release Detection (Check all that apply)**

**Pressurized Piping**

*Lines are manifolded*

Mechanical Leak Detector (MLLD)  Electronic Leak Detector (ELLD) - check for swiftcheck requirement

Date of last testing: \_\_\_\_\_

Last three tests available?  Yes  No

*Testing done at startup*

Number of lines tested: \_\_\_\_\_

Number of LD tested: \_\_\_\_\_

Leak detector manufacturer make and model: Veeder Root PLLD

MLLD on turbine manifold?  Yes  No

MLLD product appropriate? (Example, diesel Red Jacket FX series on diesel system?)  Yes  No

If ELLD and no line testing: Annual 0.1 gph results from tank gauge?  Yes  No

**Interstitial Monitoring**

(Required for piping installed after March 8, 2008)

[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).]

Date of last sump testing: 12/28/2020

*during installation*

Last two tests available?  Yes  No

Date of last sensor testing: 12/28/2020

Last three tests available?  Yes  No

Float sensors installed correctly?  Yes  No

Presence of water in sumps?  Yes  No

Interstitial space opened to sump?  Yes  No

**Safe Suction**

Check valve directly below suction pump?  Yes  No

**c) Monthly Tank Release Detection (Check all that apply)**

Tank Gauge  CSLD  SCALD  Static

Are correct tank sizes programmed at tank gauge?  Yes  No

Tank diameter/length seem appropriate?  Yes  No

Are tanks manifolded?  Yes  No

If so, tank gauge testing setup for manifolded tanks?  Yes  No

*If Veeder Root tank gauge leak detection*

CSLD set at 99%

Thermal coefficient set correctly?

(Gasoline 0.00070; Diesel 0.00045)

*If Incon/Franklin tank gauge leak detection*

If SCALD is Vol Qual set to 14% (or 99% confidence)

Is API gravity set correctly?

(Regular 63.5; Plus 62.8; Super 51.3; Diesel 32.8)

For all tank gauges doing static tests

(Static tests require tank to be 50% full for a valid test)

**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

**Tank release detection records available during inspection**

T1:	<input checked="" type="checkbox"/> 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
T2:	<input checked="" type="checkbox"/> 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
T3:	<input type="checkbox"/> 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
T4:	<input type="checkbox"/> 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
T5:	<input type="checkbox"/> 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

Inspector: mdrouin Date: 9/4/2024 Time: 9A Facility: 10784

**VIII. Spill Prevention** Compliance  Yes  No

Date(s) of testing: 12/28/2020 - Dummy install Number of spill buckets tested? \_\_\_\_\_

Did spill bucket pass most recent testing?  Yes  No If no, was spill bucket replaced/repaired?  Yes  No

During inspection, visual damage to spill bucket?  Yes  No not tested since

Hydrostatic testing (test takes one hour to complete)

Vacuum test (test takes 1 minute, ending vacuum must be 26 inches water column or greater)

**IX. Overfill Prevention** Compliance  Yes  No

Date(s) of testing: 12/28/2020 dummy install

Overfill device pass most recent testing?  Yes  No If no, overfill device replaced?  Yes  No

Overfill method that was tested:  Alarm  Flapper  Ball Float

Overfill Alarm

Alarm sounds when tank is 90% full  Yes  No not tested since

Driver can see or hear alarm at point of transfer?  Yes  No

Sound alarm from tank gauge during inspection?  Yes  No

Flapper Valve

Testing verified the valve automatically restricts flow at 95%  Yes  No

Visual observation of flapper on day of inspection?  Yes  No

Ball Float

Testing verified the ball float automatically restricts flow at 90%  Yes  No

Visual observation of ball float during inspection?  Yes  No

**X. Corrosion Protection** Compliance  Yes  No

Cathodic  Galvanic  Impressed Current

Steel tank with cathodic?  Yes  No DW FRP Tanks

Steel pipes with cathodic?  Yes  No

Steel flex-lines with cathodic?  Yes  No

Date of cathodic test: \_\_\_\_\_

Last two tests available?  Yes  No

Did last test pass?  Yes  No

If not:

Was failed test reported to DEQ?  Yes  No

Was system repaired?  Yes  No

Date of repair? \_\_\_\_\_

Cathodic retested within 6 mos. of repair?  Yes  No

Date of retesting? \_\_\_\_\_

If impressed current system:

Rectifier Operational?  Yes  No

Rectifier log maintained?  Yes  No

Rectifier been operating continuously  Yes  No

Tank Lining

Date of lest test? \_\_\_\_\_

Pressure test conducted after tank lining inspection?  Yes  No

XI. General notes from inspection

Representative onsite: Robert Marble email: robert.marble@usbank.com

10/15/2024 mascot testing

- missing annual leak detector testing H2.9
- missing annual leak detection operability testing G5
- missing triennial spill bucket testing C10
- missing triennial overfill prevention testing C2C
- missing triennial sump integrity testing C1E

each tank has 2 turbines. Each set of turbines have one electronic line leak detectors. Lines are manifolded. No programming in tank gauge. need to verify STP-SCI controllers

- requested to be present during testing on 10/15 to verify SCI controllers programmed correctly

Compliance Determination:  No Violations Observed  Observed violations resulting in enforcement

Inspector Signature: Mark Brown Date: 9/10/2024



**MacDonald-Miller**  
FACILITY SOLUTIONS

**INVOICE**

MacDonald-Miller Facility Solutions LLC.  
17930 INTERNATIONAL BLVD STE 120 SEATAC, WA 98188  
Phone (206) 763-9400

INVOICE NUMBER **JC97699**  
INVOICE DATE **10/31/2024**  
PO Number **092624CCOC-01**  
**Total Due \$7,420.00**

**BILL TO**  
US BANK COLUMBIA CENTER  
ATTN: ROBERT MARBLE  
17650 NE SANDY BLVD  
PORTLAND, OR 97230

**JOB ADDRESS**  
US BANK CC FUEL OIL DEQ TEST  
17650 NE SANDY BLVD  
PORTLAND, OR 97230

Job 83240148 US BANK CC FUEL OIL DEQ TEST

Salesperson	Customer Number	Contract Number	Payment Terms	Shipping Method	Due Date
CHRISTOPHER GRIFFITHS	40689		Due On Receipt		10/31/2024
Description	OCTOBER BILL FOR US BANK CC FUEL OIL DEQ TEST				

Billing Amount	\$7,420.00
Retention Withheld	\$0.00
Retention Due	\$0.00
Subtotal	\$7,420.00
Miscellaneous	\$0.00
Total Tax	\$0.00
<b>Total</b>	<b>\$7,420.00</b>

11/4/24

Please email questions to [INVOICES.AR@MACMILLER.COM](mailto:INVOICES.AR@MACMILLER.COM)  
Remit to: Macdonald-Miller Facility Solutions, LLC Dept. C700 PO Box 509017 San Diego, CA 92150-9017  
All credit card payments will incur an additional surcharge of 3.5% In fees based on the total invoice value, we accept Mastercard and Visa.

# Mascott Equipment Co.

## SERVICE ORDER

495431

- PORTLAND  
435 N.E. HANCOCK  
PORTLAND, OR 97212  
503-282-2587
- TRICITIES  
2464 ROBERTSON DRIVE  
RICHLAND, WA  
509-543-2018
- SEATTLE  
6530 5TH PLACE SOUTH  
SEATTLE, WA 98108  
206-763-7867
- ANCHORAGE  
5610 SILVERADO WAY #3  
ANCHORAGE, AK 99518  
907-561-1119

ACCOUNT NUMBER
4111

JOB SITE	
ORDER DATE 10/10/24	JOB PHONE (503) 866-3478
WORK ORDERED BY <b>Robert Marvel</b>	

SOLD TO <b>Macdonald-Miller</b>		JOB NAME <b>US Bank</b>	
ADDRESS <b>P.O. Box 47983</b>		ADDRESS <b>17650 NE Sandy BLVD</b>	
CITY <b>Seattle, WA</b>	STATE	CITY <b>Portland, OR</b>	STATE <b>97230</b>

CUSTOMER P.O. NUMBER <b>D. Reeves</b>	TECHNICIAN	MFG AUTHORIZATION (if necessary)	
MODEL	SERIAL NUMBER	MODEL	SERIAL NUMBER

PROBLEM REPORTED: **Annual Compliance testing**  
**Triennial EPA Compliance testing**


**MATERIAL USED**

QTY.	WH	PART NUMBER	DESCRIPTION	PRICE	AMOUNT
2	22	Testing	Line and line leak detector test		0.00
2	22	Testing	Overfill test at drop tube		0.00
6	22	Testing	Hydrostatic sump test		0.00
2	22	Testing	Spill bucket test		0.00
1	22	Testing	Monitor Inspection		0.00
					0.00

TIME ARRIVED	0730 AM PM (circle one)	TIME DEPARTED	AM PM (circle one)	Customer Initials _____
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WORK DESCRIPTION: **Tested 2 lines and ELLD's.**  
**Monitor Inspection on TLS-450+.**  
**Tested 6 sumps at low level and 2 spill buckets, 2 overfill at drop tube.**  
**Tank 2 annular sensor will not alarm with either product or water. Veeder-Root discriminating sensor, annular, 10' tank.**

WARRANTY <input type="checkbox"/>	COMPLETE <input checked="" type="checkbox"/>	PENDING <input type="checkbox"/>
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SERVICEMAN	CHARGES	QTY.	RATE	AMOUNT
	STANDARD LABOR			0.00
	OVERTIME LABOR			0.00
	TRAVEL TIME			0.00
DATE COMPLETED 10/15/24	MILEAGE			0.00
TERMS: <b>NET 10TH PROX</b> PRINT CUSTOMER NAME	TOTAL MATERIAL	0.00		0.00
	MISC. MATERIAL			0.00
	LAP TOP FEE			0.00
CUSTOMER AUTHORIZED SIGNATURE	SUB TOTAL			0.00
	SALES TAX			0.00
<b>TOTAL AMOUNT DUE</b>				<b>0.00</b>



**From:** [Marble, Robert D](#)  
**To:** [LITKE Emily \\* DEQ](#); [UST Duty Officer \\* DEQ](#)  
**Cc:** [Knepper, Alan M](#); [DROUIN Mark \\* DEQ](#); [Hunter, Benjamin C](#); [Montoya, Gabriel](#)  
**Subject:** RE: UST Facility 10784: US Bank Operations  
**Date:** Wednesday, November 20, 2024 1:47:26 PM  
**Attachments:** [image001.png](#)  
[Mascott Testing 10.15.24.pdf](#)  
[MacDonald-Miller 11.4.24.pdf](#)

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Emily,

Good update and glad to hear the bank got that fine paid in time, that was my concern. Accounts payable has been moving like pond-water lately.

The testing requirements were completed on 10/15/24 by Mascott Equipment, see attached service report. They were subcontracted by MacDonald-Miller Facility Solutions, see attached invoice.

The testing was witnessed by one of Mark Drouin's team members. I don't recall the name but have copied Mark.

Is there anything else needed?

Thanks!

**Robert D Marble**

Officer | Facility Chief Engineer

p. 503.401.4790 | c. 503.866.3478 | [robert.marble@usbank.com](mailto:robert.marble@usbank.com)

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**From:** LITKE Emily \* DEQ <Emily.LITKE@deq.oregon.gov>  
**Sent:** Wednesday, November 20, 2024 1:28 PM  
**To:** UST Duty Officer \* DEQ <UST.DutyOfficer@DEQ.oregon.gov>; Marble, Robert D <robert.marble@usbank.com>  
**Cc:** Knepper, Alan M <alan.knepper@usbank.com>  
**Subject:** [EXTERNAL] RE: UST Facility 10784: US Bank Operations

[WARNING] Use caution when opening attachments or links from unknown senders.

Hey Robert,

I am following up on **facility 10784 US Bank Operations** located at 17650 NE SANDY BLVD,

PORTLAND, Oregon 97230.

Payment of the \$1400 fine was received and processed on 10/16/24. **The deadline for the corrective actions was 11/17/24.** Please provide an update.

Corrective Actions:

**Violation #1** - Conduct annual release detection operability testing (leak detectors, tank top sump and trench sensors, tank interstitial sensors, tank probes) and submit results to the DEQ by 11/17/24

**Violation #2** - Conduct triennial testing of the spill buckets and tank top sumps and submit records to DEQ by 11/17/24

**Violation #3** - Triennial testing of the overflow alarm (this will be conducted when the probes are removed) and submit documents to DEQ by 11/17/24

**Violation #4** - Conduct annual testing of the tank probes and submit records to DEQ by 11/17/24

Please email work orders, testing reports, and invoices to this email thread.



**Emily Litke** (she/her)

Duty Officer, Underground Storage Tanks  
DEQ Headquarters, Land Quality Division  
700 NE Multnomah Street, Suite 600  
Portland OR 97232-4100  
503-806-9516

[Emily.LITKE@deq.oregon.gov](mailto:Emily.LITKE@deq.oregon.gov)

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**From:** UST Duty Officer \* DEQ

**Sent:** Saturday, September 28, 2024 6:19 PM

**To:** Marble, Robert D <[robert.marble@usbank.com](mailto:robert.marble@usbank.com)>; UST Duty Officer \* DEQ <[UST.DutyOfficer@DEQ.oregon.gov](mailto:UST.DutyOfficer@DEQ.oregon.gov)>

**Cc:** Knepper, Alan M <[alan.knepper@usbank.com](mailto:alan.knepper@usbank.com)>

**Subject:** RE: UST Facility 10784: US Bank Operations

Hello Robert,

Thank you for the response.

As for the payment, please do your best to process the payment by the due date. There is a short grace period for payments and understand that it takes some time for checks to be mailed and then processed by the DEQ accounting department.

There are two due dates, one for the payment of the fine and the later due date for the corrective actions. We typically give 30 days for payment of the fine and 60 days to correct any violations witnessed during the inspection. I hope this better explains why there are two due dates listed.

It is not necessary to submit the forms a second time with the completion of the corrective actions. As long as the DEQ has one copy of signed forms with payment.



**Emily Litke** (she/her)  
Duty Officer, Underground Storage Tanks  
DEQ Headquarters, Land Quality Division  
700 NE Multnomah Street, Suite 600  
Portland OR 97232-4100  
503-806-9516  
[Emily.LITKE@deq.oregon.gov](mailto:Emily.LITKE@deq.oregon.gov)

---

**From:** Marble, Robert D <[robert.marble@usbank.com](mailto:robert.marble@usbank.com)>  
**Sent:** Friday, September 27, 2024 2:21 PM  
**To:** UST Duty Officer \* DEQ <[UST.DutyOfficer@DEQ.oregon.gov](mailto:UST.DutyOfficer@DEQ.oregon.gov)>  
**Cc:** Knepper, Alan M <[alan.knepper@usbank.com](mailto:alan.knepper@usbank.com)>  
**Subject:** RE: UST Facility 10784: US Bank Operations

Hello Emily,

I'll be submitting this document in lieu of an invoice to my invoice processing team today, it will be paid with the October invoice batch.

Two question though:

**Question 1:**

I'm unsure if they will be able to pay by the 10/17 date, as the bank processes payments outside of my control. I'm assuming we'll receive an additional fine for that, any idea of what dollar amount to expect?

Otherwise we appear to be on track. I've engaged Mascott and they have confirmed the scheduled date of 10/15 to complete the required testing, and Mark Drouin from DEQ said he'll be onsite for the testing as well.

**Question 2:**

On the citation letter page 1, it states to select either option 1 or option 2, and return a signed copy of this letter by 10/15/24.

But on page 3, it states to sign the letter, correct the violations, and return the form by 11/17/24.

I'm interpreting this to mean that page 3 is submitted separately, after the violations are corrected, but to return pages 1 and 2 with the option selected prior to the earlier date? Please let me know if I've interpreted it incorrectly.

I've attached the signed copy pages 1 and 2 of the citation, with the Option 1 checkbox selected. And will return page 3 with signature after the violations have been corrected on 10/15. But again, please correct me if I'm misunderstanding the instructions.

Was there anything else needed from us at this point?

**Thanks!**

**Robert D Marble**

Vice President | Property/Facility Region Mgr

O: 503-401-4790 | M: 503-866-3478 | [robert.marble@usbank.com](mailto:robert.marble@usbank.com)

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**From:** UST Duty Officer \* DEQ <[UST.DutyOfficer@DEQ.oregon.gov](mailto:UST.DutyOfficer@DEQ.oregon.gov)>

**Sent:** Thursday, September 19, 2024 10:45 AM

**To:** Marble, Robert D <[robert.marble@usbank.com](mailto:robert.marble@usbank.com)>

**Cc:** Knepper, Alan M <[alan.knepper@usbank.com](mailto:alan.knepper@usbank.com)>

**Subject:** [EXTERNAL] RE: UST Facility 10784: US Bank Operations

[WARNING] Use caution when opening attachments or links from unknown senders.

Hey Robert,

I am following up on the inspection conducted by Mark Drouin on 9/4/2024 for **facility 10784 US Bank Operations**.

I have attached the field citation. **Deadline for the \$1400 fine is 10/17/24 and the deadline for the corrective actions is 11/17/24**

I know you mentioned that Mascot will be on site on 10/15/24, but please let us know if the

testing date changes.



**Emily Litke** (she/her)

Duty Officer, Underground Storage Tanks  
DEQ Headquarters, Land Quality Division  
700 NE Multnomah Street, Suite 600  
Portland OR 97232-4100  
503-806-9516  
[Emily.LITKE@deq.oregon.gov](mailto:Emily.LITKE@deq.oregon.gov)

---

**From:** Marble, Robert D <[robert.marble@usbank.com](mailto:robert.marble@usbank.com)>  
**Sent:** Tuesday, September 10, 2024 12:23 PM  
**To:** UST Duty Officer \* DEQ <[UST.DutyOfficer@DEQ.oregon.gov](mailto:UST.DutyOfficer@DEQ.oregon.gov)>  
**Cc:** Knepper, Alan M <[alan.knepper@usbank.com](mailto:alan.knepper@usbank.com)>; SPENCER Alex \* DEQ <[Alex.SPENCER@deq.oregon.gov](mailto:Alex.SPENCER@deq.oregon.gov)>  
**Subject:** RE: UST Facility 10784: US Bank Operations

Received, thank you Mark.

I've sent this over to Mascott to make sure we're scheduled for the correct testing services for 10/15. I'll follow up once they've assigned the work request, and we have a the start time. Also, I'll discuss the STP devices with them and see if they can handle opening / manipulating them for your review.

Thanks!

**Robert D Marble**

Vice President | Property/Facility Region Mgr  
**O:** 503-401-4790 | **M:** 503-866-3478 | [robert.marble@usbank.com](mailto:robert.marble@usbank.com)

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**From:** UST Duty Officer \* DEQ <[UST.DutyOfficer@DEQ.oregon.gov](mailto:UST.DutyOfficer@DEQ.oregon.gov)>  
**Sent:** Monday, September 9, 2024 4:24 PM

**To:** Marble, Robert D <[robert.marble@usbank.com](mailto:robert.marble@usbank.com)>  
**Cc:** Knepper, Alan M <[alan.knepper@usbank.com](mailto:alan.knepper@usbank.com)>; SPENCER Alex \* DEQ <[Alex.SPENCER@deq.oregon.gov](mailto:Alex.SPENCER@deq.oregon.gov)>  
**Subject:** [EXTERNAL] UST Facility 10784: US Bank Operations

[WARNING] Use caution when opening attachments or links from unknown senders.

Robert,

Thanks for meeting with us on September 4, 2024, for the UST inspection. As I communicated during the inspection, it appears US Bank is missing the annual and triennial compliance testing for this facility which are violations of the UST rules. Our Enforcement Specialist will issue the enforcement documentation regarding this inspection.

You stated that Mascott will be on-site on October 15, 2024, to complete the 2024 testing. I would like to come out on that day to talk more about the system. I think the dual turbines are operated by the STP-SCI drives. Can you be prepared to open those four STP-SCI drives. Also, do you have the volume of that trench?

I attached a video of how to sound the overflow alarm using the Veeder Root 450. It is a 18 mb file so hopefully it comes through.

Based on your system this is the following testing that is required to be completed on October 15, 2024.

- Annual release detection operability testing, All the following must be tested:
  - Leak detectors
  - Tank top sump and trench sensors (sensors must be removed and tested in water)
  - Tank interstitial sensors (this sensor must be removed and tested in water)
- Annual testing of the tank probes
- Triennial testing of the overflow alarm (this will be conducted when the probes are removed)
- Triennial testing of the spill buckets and tank top sumps

The following are the violations I observed during the inspection:

- Failure to test spill prevention equipment and sumps used for interstitial monitoring at least once every 3 years (C1e)
- Failure to inspect overflow equipment at least once every 3 years (C2c)
- Failure to perform an annual test of operation of line leak detector.(H2.9)
- Failure to conduct annual operability testing of the release detection system (tank gauge, probes, and sensors). (G5)

Submit the testing results from the October 15, 2024, compliance testing to the DEQ by November 30, 2025.

As I stated previously, our Enforcement Specialist will provide you with the appropriate enforcement documentation.

If you have any questions please do not hesitate to contact me

Mark Drouin  
541.213.1204  
UST Compliance Program

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**From:** Marble, Robert D <[robert.marble@usbank.com](mailto:robert.marble@usbank.com)>  
**Sent:** Wednesday, August 28, 2024 10:39 AM  
**To:** DROUIN Mark \* DEQ <[mark.drouin@deq.oregon.gov](mailto:mark.drouin@deq.oregon.gov)>  
**Cc:** Knepper, Alan M <[alan.knepper@usbank.com](mailto:alan.knepper@usbank.com)>  
**Subject:** RE: UST compliance inspection notice confirmation

The current Financial responsibility document is attached here.

**Robert D Marble**  
Vice President | Property/Facility Region Mgr  
**O:** 503-401-4790 | **M:** 503-866-3478 | [robert.marble@usbank.com](mailto:robert.marble@usbank.com)

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**Columbia Center**  
17650 NE Sandy Blvd, Gresham, OR 97230-5000 | PD-OR-C1EG | [usbank.com](http://usbank.com)

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**From:** Marble, Robert D  
**Sent:** Wednesday, August 28, 2024 10:30 AM  
**To:** [mark.drouin@deq.oregon.gov](mailto:mark.drouin@deq.oregon.gov)  
**Cc:** Knepper, Alan M <[alan.knepper@usbank.com](mailto:alan.knepper@usbank.com)>  
**Subject:** RE: UST compliance inspection notice confirmation

In preparation for your visit on 9/4, I've attached the first batch of requirement documentation. This batch covers the fuel handler certification training for my team.

I'll send over the other items as I get them reviewed and compiled.

Thanks!

**Robert D Marble**

Vice President | Property/Facility Region Mgr

O: 503-401-4790 | M: 503-866-3478 | [robert.marble@usbank.com](mailto:robert.marble@usbank.com)

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**From:** Marble, Robert D

**Sent:** Monday, August 5, 2024 3:24 PM

**To:** [mark.drouin@deq.oregon.gov](mailto:mark.drouin@deq.oregon.gov)

**Cc:** Knepper, Alan M <[alan.knepper@usbank.com](mailto:alan.knepper@usbank.com)>

**Subject:** UST compliance inspection notice confirmation

Hello Mark,

I'm confirming receipt of the UST compliance inspection notification, received today. I'll get the necessary documentation compiled and ready for inspection for stated appointment on 9/24 at 0900 Hrs.

A few notes about accessing the site:

1. Government issued photo ID required at entrance gate
2. Easiest access gate is from 17650 NE Sandy Blvd.
3. Once onsite, enter through the front door and check in at the Security desk in the lobby. Let the guard know you are here to see Robert from Engineering. They'll call me on the radio, and I'll come get you signed in and taken to the physical plant where the UST's are located

Thanks!



**Robert D Marble**

Vice President | Property/Facility Region Mgr

O: 503-401-4790 | M: 503-866-3478 | [robert.marble@usbank.com](mailto:robert.marble@usbank.com)

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U.S. BANCORP made the following annotations

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DataBase Connection: PROD

# Program Enforcement Maintenance



- Program Enforcement**
- Violations List (4)
- Corrective Actions (0)
- Link Actions

File #

Name

Location

Permit

**Recipient Information:**

Name / Title

Address

Phone / Fax / Email

Program Enforcement Number

Regulatory Program

Staff Assigned

Enforcement Type

Enforcement Action Issued Date

Response Received Date

Payment Due Date

Payment Received Date

Penalty Amount

## Related Items

	ID	Name/Reference	Date
<input type="button" value="Select"/>	SV: 22057	Full Compliance Inspection (FCI)	09/04/2024
<input type="button" value="Select"/>	PE: 9541	Field Citation	09/17/2024
<input type="button" value="Select"/>	SV Vio: 20450	(H2) Release Detection Pressure Piping - TCR	09/04/2024
<input type="button" value="Select"/>	SV Vio: 20451	(G) General Release Detection - TCR	09/04/2024
<input type="button" value="Select"/>	SV Vio: 20452	(C) Spill and Overfill Prevention - TCR	09/04/2024
<input type="button" value="Select"/>	SV Vio: 20453	(C) Spill and Overfill Prevention - TCR	09/04/2024

Records Found = 6

## Legend

ID Type	Description
SV	Site Visit
PE	Program Enforcement
SV Vio	Site Visit Violation

PEN Referral Date

Show Calendar

Closed Date

Show Calendar

Withdrawn Date

Show Calendar

Link To Complaint

Comments Pd 10/18; ACH 1861392; \$1400.00; US Bank

Edit

Delete

Create By 09/17/2024

Diana Foss

Last Update By 10/18/2024

Tanisha Smith

Record ID 9541

Create PEN

Create OCE Enforcement