

# Department of Environmental Quality Northwest Region

700 NE Multnomah Street, Suite 600 Portland, OR 97232 (503) 229-5696 FAX (503) 229-6124 TTY 711

August 8, 2024

Radio Cab Co., Inc. Attn: Stephen Entler, MANAGER 1613 NW Kearney St Portland, OR 97209-2312

RE: UST Compliance Inspection

DEQ UST #5173 - 1613 NW Kearney St, Portland

Dear Radio Cab Co., Inc.:

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 facilities, among others, has been selected for inspection. A thorough inspection of your facilities 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 these facilities is scheduled for September 17, 2024 starting at approximately 9 am at the DEQ UST #s listed below.

### September 17<sup>th</sup> at 9 am:

DEQ UST #5173 - 1613 NW Kearney St

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.

DEQ staff will not assist with operating tank gauges or open sump lids. Please be prepare to open and operate these system parts.

The DEQ requests the following documentation be submitted electronically via email prior to the inspection:

- Line and leak detector testing results for the past three years,
- Monthly tank leak detection records, one year
- Class A, B, and C training documentation,
- Financial responsibility mechanism,
- Annual tank gauge certification for the past three years
- Spill prevention testing records, was due by October 2020
- Monthly walkthroughs, one year
- Overfill Prevention Equipment testing, was due by October 2020

• Cathodic protection testing (if applicable). All tests since 2019.

Please submit these records to <u>ingrid.gaffney@deq.oregon.gov</u> for review. If these records cannot be submitted prior to the inspection, please have them available for review at the facility.

Owners must also be able to operate the tank gauge and print out applicable reports such as the tank setup and intank alarm reports. Owners also must be able to sound high fill over alarm from the tank gauge, if applicable.

DEQ will not touch any equipment, if you are unable to assist with equipment access, please have your UST Service Provider there. 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 503-875-1246 <u>ingrid.gaffney@deq.oregon.gov</u> to answer any questions you may have and assist you in the preparation for your inspection.

Sincerely,

Ingrid Gaffney

**UST Compliance Specialist** 

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

Inspector: Ingrid Gaff	fney Date:	17/24	Time: 9AM	-	Facility:	5172	<u>)                                    </u>
I. Site Information					(C)		
Facility Name:	Radio Cab		Radio (ab (a	o, Inc.	Contact	hen 8	itler
Site Address: 10	13 NW Kear	neyst.	Organization: SAM	ne	Phone		
city: POYH	and OR 97	-209	Phone:		503	227.	H12
II. Tank Information	· /		1		7	I	
DEQ Permit #	BCCBA	BCEAH					
Estimated Gallons	Site Information Collity Name: Radio (ab)  Radio (ab)  Radio (ab)  Permittee:  Contact  Phone  Phone:  Ph						
Facility Name: RADIO (Ab)  Facility Name: RADIO							
Tank Material	Sti-P3	Sti-P3					
I. Site Information Facility Name: RADIO (Ab Particle Cab Co, Inc. Contact Con							
Pipe Material	Smith Fibera	Smith Fiber					
Pipe Type	pressure	pressure					
Pipe Install Date	19/8/1992	9/8/1992					
Overfill Device	Anto Shutoff	AntoShutalt					
				Check file	e before cond	lucting insp	ection
# 2019 A	eld citation	- Corrison Pri	stection fasti	ing Not	dono	last 2	
	ay minor carries	10				_/_	
					0,00,000,000,000,000,000,000,000,000,000	<b>≱</b> ∐Yes	LINO
	<u> </u>		<i>V</i>		COLOR DE LA MARIA DE LA COLOR	EV/oc	□No
Class A/B Operator		Name: <				<b>.</b>	· · · · · · · · · · · · · · · · · · ·
Class C Operator	Dives	A A	WAS ANTRACIONAL	Z. Z	•	126	2012
V. Financial Responsi	bility	- Ar-v		Complian	ce )	Dr Yes	□No
Type of coverage:	loswance	L	Begin Date: 2 16	2024	End Date:	2/16/	207
Coverage amount cor			Number of tanks cove	ered:	2	1 - 1	
Financial responsibility cou	uld also be in the form of se	If insurance, bonds, local g	overnment, trust fund, and	or guarantee			<u>.</u>
VI. Walkthrough Req	uirements		(	Complian	ce <u> </u>	121 Yes	□No
Spill prevention and r	elease detection equip	ment checked month	ly? (Manager)		T		CANGE !
Tank top sumps check	ked annually?	Page	1 of 4			<b>□</b> Yes	□No

VII. Release Detection				Compliance	□Yes	DVN0
a) Annual Release Detection Operability Testing (Son	netimes r	eferred to a	s Tank Ga			LVIIO
				,		
Date of last testing:	<u> </u>	1 ,		rree tests available?	□Yes	VZ No
b) Piping Release Detection (Check all that apply)	٤	3/12/2	2	\$ ** 		
Pressurized Piping		• •				4
✓ Mechanical Leak Detector (MLLD) ☐ Electron	nic Leak (	Detector (EL	LD) - check	k for swiftcheck requirement		
		`	•			./
Date of last testing:	1	(al -	Last th	rree tests available?	□Yes	₫ <b>⁄</b> No
Number of lines tested	21	12/22	Nivende	or of ID tootod.		
Number of lines tested:  Leak detector manufacturer make and mod	<del></del>		NUIID -	er or LD tested:		_
Leak detector manufacturer make and mod	del:	10 7	2000	D, vm1		
					•	
Tank gauge manufacturer make and model	:	V	wa	er Root		_
MLLD on turbine manifold?					Yes	□No
MLLD product appropriate? (Example, dies				el system?)	□ Yes	□No
If ELLD and no line testing: Annual 0.1 gph	results fro	от тапк gat	iger		☐ Yes	□No
Interstitial Monitoring		da luitiala afu		1 ;	to alorala	
Monthly records must include, date system was checked, obser power status (on or off), alarm indication status (yes or no) and :					inciuae	
power status (or or orig, alarm maleution status (yes or no) and	aciiaoi iilaii	iunction notes	tyes or noy.	·J		
Date of last sump testing:			Last tv	vo tests available?	□Yes	□No
Date of last sensor testing: 5/12/2022			Last th	ree tests available?	☐ Yes	□ No
Float sensors installed correctly?	□Yes	□No				
Interstitial space opened to sump? Presence of water in sumps?	□ Yes □ Yes	□ No □ No				
☐ Safe Suction	□ 163	LINO				
Check valve directly below suction pump?	□Yes	□No				
c) Monthly Tank Release Detection (Check all that app	n/v)			If Veeder Root tank gauge lea	k detection	The same and the state of the same of the
☑ Tank Gauge ☑ SCALD ☐ Static	,,			CSLD set at 99%		
Are correct tank sizes programmed at tank gauge?		√Yes	□No	(Gasoline 0.00070; Diese	-	
Tank diameter/length seem appropriate?		<b>∀</b> es	□ No	If Incon/Franklin tank gauge le  ☐ If SCALD is Vol Qual set to		nfidence)
Are tanks manifolded?		□Yes	Ľ¶ <b>N</b> o	☐ is API gravity set correctly	?	•
If so, tank gauge testing setup for manifolded tank	κs?	□ Yes	⊡∕No	(Regular 63.5; Plus 62.8; For all tank gauges doing station		sei 32.8j
\ <u></u>				(Static tests require tank to l	e 50% full for a	valid test)
Interstitial Monitoring [Monthly records must include, da	te system v	vas checked, o	bservations	s made, initials of person ched	cking.	
Electronic records must include power status (on or off), alarm inc	dication sta	itus (yes or no)	and sensoi	r malfunction notes (yes or no	o).]	
Ensure pass or fail results within 30-day period. Inc	onclusive r	esult means re	elease detec	tion requirement not met		
	-,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	count means re	detec	Mon requirement froe mee		
		•				
	y				•	
Tank release detection records available during inspec	tion		<u></u> > م،	023		<u> </u>
T1: ☐Jan ☐ Feb ☐ Mar ☐ Apr ☐ May	<b>‡</b> iJun	□ Jul	Aug	βep □Oct	Ø Nov ✓	Dec [
T2:dJan diFeb │□Mar □ Apr □ May	фJun	□Vul	bµAµg	□\$ep □\Oct	₽ Nov	Dec Dec
T3:□dan □ Feb □ Mar □ Apr □ May ○	∖□Jun∕	\ DJul	□Aug	1 7 1	Non	\ \ <sup>D</sup> Pec /
T4: [Jan Dreb In Mar DADr May	Jup	\ _Jy/ `	☐ Avig	_	Nov	\ \phi
T5:1dJah MorFeta □ Miar □ Api □ May	Ы√un	∖⊑∕∕ul	Aug	□ Sep □ Oct	□ <b>W</b> ov	□ Dec

Inspector: Ingrid Gaffney Date: Time:		Facil	ity: <u>517</u>	<u>3</u> /
VIII. Spill Prevention		Compliance	□Yes	□No
Date(s) of testing:	Number	of spill buckets tes	sted?2	2
Did spill bucket pass most recent testing? ☐ Yes ☐ No If no, During inspection, visual damage to spill bucket? ☐ Yes ☐ ☐ Yes ☐ Yes ☐ Yes ☐	was spill buck	et replaced/repair	ed? □Yes	□No
(Till universable testing /test takes and hour to complete)		•	·	i e
· ·	greater)			· · ".
IX. Overfill Prevention	B)	Compliance	□Yes	De No
Date(s) of testing: 5/12/2022			· • • • • • • • • • • • • • • • • • • •	
Overfill device pass most recent testing?	overfill device	replaced?	□Yes	□No
Overfill method that was tested: ☐ Alarm ☐ Flap	oper	□ Ball Float	100	
<u>Overfill Alarm</u>	,		1-10 +	- 1
Spill Prevention				
ate(s) of testing:				
Sound alarm from tank gauge during inspection?	□Yes	□Noficial	11 6	0
<u>Flapper Valve</u>		<u>,</u>		
Testing verified the valve automatically restricts flow at 95%	[☑ Yes			
Visual observation of flapper on day of inspection?	√es	□No		
<u>Ball Float</u>		2		
Testing verified the ball float automatically restricts flow at 90	0% □Yes	□No	. 1	
Visual observation of ball float during inspection?	□Yes	□No		
X. Corrosion Protection		Compliance	v <b>Z</b> Yes	□No
	rent			
		□No		
			_	
·			2019	
		_,,,		
•	□Yes	□No	2013	
			2021	1
· · · · · · · · · · · · · · · · · · ·			200	7
	□Yes	⊓No		
<u>'</u>				
	GW.	r 8.1		
	∟ı Yes	L.J INO		
-				
<u>-</u>				
Rectifier been operating continuously	□Yes	□No		
□ Tank Lining				
Date of lest test?				
Pressure test conducted after tank lining inspection?	□Yes	□ No		
Number of spill buckets tested?   2				
			•	
			-	
1	•			

XI. General notes from inspection	
Representative onsite: Stephen	email: claums C radiocab. net
* Paperwork:	christina
, I prouvance now po	ticy
o Annual testing Tri annual testin repairs.	Missing two years 19 - missing 2023 and late. The contraction
· nonthly walkthr	oughs /
:	
·	
Consilion of Determination	
Compliance Determination:   No Violations Observed	Observed violations resulting in enforcement
Inspector Signature: Which Haffin	Date: 9/7/2024
V VV Est	) e 4 of 4





1: 1613 NW Kearney St, Portland, OR 97209 tank nest



2: Pressure vents





3: Tank nest looking north



4: Regular sump







5: Regular fill

6: Regular sump #2





7: UDC #1



8: UDC #3

**FACILITY NAME: Radio Cab #5173** 

**INSPECTION DATE: September 17, 2024** 



# OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY INSPECTION PHOTOLOG



9: UDC #3



**Program Enforcement No.** <u>2024-FC-9555</u>

# **Department of Environmental Quality Underground Storage Tank Program**

# Field Citation For UST Violations

This section for DEQ use only

Quality	For UST V	iolations				
					Page 1	of 3
D	EQ Information	US	Facility:	Informat	ion	
Inspection Date:	09/17/2024	Facility ID#:	5173			
Inspector:	Ingrid Gaffney	Facility Name:	Radio Ca	b		
DEQ Office:	700 NE Multnomah St, Ste 600	Facility Address:	1613 NW	Kearney	St	
	Portland, OR 97232		Portland,	OR 9720	9	
Phone #:	503-875-1246	County:	Multnoma	ah		
Oregon DEQ inspected	the facility listed above and identified	the UST violations listed of	on page 3 of	this Field	Citation.	
Field Citation Issue	ed: O In Person O By Mai	l O Both	Date Iss	<b>ued:</b> 09/25	5/2024	
Facility Representative Pre	esent During Inspection: Stephen E	intler	O Permit	tee O	Owner (	Other
Name of Permittee or Owi	ner: Radio Cab Co., Inc. Attn: Step	hen Entler				
Mailing Address: 1613	NW Kearney St, Portland, OR	97209-2312				
Field Citation Pena	alty – See Page 3 for detailed listir	ng of each violation.		\$ 850		.00
This Fiel	d Citation is issued in accordance w underground storage tank (				ment of	f
		,				
Owner or Perm	ittee should select Option 1 or	-	eturn a s	igned cop	py of th	his form
1	to DEQ by the following date:	10/25/2024				
		DEQ Revenue Section				
		700 NE Multnomah St				
Check one option		Portland, Oregon 9723	32			
	I acknowledge that the listed was citation penalty.	violation(s) have occu	irred and	I am ren	nitting	the
understand	I do not want to participate in I that my file will be referred to nt for formal enforcement action	the Department's O				
Name:				Owne	er /	Permittee
Signature:				Date:		
	Impo	ortant	_			

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.

	Departme	ent of Environmental Quality <b>UST FIEL</b>	, -	_	ank Program		
DATE IS	SSUED: 09/25/2024 PRO	OST FIEL OGRAM ENFORCEMENT I			FACILITY ID: 5173		Page 3 of 3
Violation #1: *TCR: ⊙Y ○ N	Failure to test spill bucke	t prevention equ	uipment	at least or	nce every 3 years		
Corrective Action:	Perform required testing to co	rrect violation withi	n 30 days	and send re	esults to DEQ.		
Rule Citation: OAR	<b>340-150-</b> 0310(8)(b)	Penalty Amount: \$ 5	.00	Correct Violat	ion by: 10/25/2024	Date Corre	ected:
Violation #2: *TCR: ⊙Y ○ N	Failure to complete initial o	verfill alarm testir	ng require	ements by	October 1, 2020		
Corrective Action:	Perform required tri annual te	sting in 2025 and I	keep site o	n a schedu	le. Submit dates to DE	Q for 202	5 testing.
Rule Citation: OAR	<b>340-150-</b> 0310(10)	Penalty Amount: \$ 0	00. 0	Correct Violat	ion by: 2025	Date Corre	ected:
Violation #3: *TCR: ⊙Y ○ N	Failure to calibrate release detection	n equipment per manu	ıfacturer's ir	structions, inc	luding service checks for d	operability or	running condition
Corrective Action:	Perform annual testing of line leak detecti	on and tank gauge equipm	ent within 30	days. Submit req	uired testing records (and main	tain records) to	DEQ within 30 days.
Rule Citation: OAR	<b>340-150-</b> 0400(2)	Penalty Amount: \$ 2	.00	Correct Violat	ion by: 10/25/2024	Date Corre	ected:
Violation #4: *TCR: <b>○</b> Y <b>○</b> N	Failure to maintain adequa	te records of test	ing or mo	nitoring eq	uipment calibration,	maintena	nce or repair.
Corrective Action:	Begin keeping records of annual and	tri annual testing or mo	nitoring equi	oment calibration	on, maintenance or repair. N	lo document	submittal necessary
Rule Citation: OAR	<b>340-150-</b> -0400(2)	Penalty Amount: \$ 1	50 .00	Correct Violat	ion by: 10/25/2024	Date Corre	ected:
Violation #5: *TCR: OY ON							
Corrective Action:							
Rule Citation: OAR	340-150-	Penalty Amount: \$	.00	Correct Violat	ion by:	Date Corre	ected:
Violation #6: *TCR: OY ON							
Corrective Action:						_	
Rule Citation: OAR	340-150-	Penalty Amount: \$	.00	Correct Violat	ion by:	Date Corre	ected:
	Total Penalty Amount (This Page):	\$ 850 .00	Tot	al Penalty Am	ount (All Pages): \$850	.00	
YOU MUST C	CORRECT THE VIOLATIONS AS	REQUIRED, ENTE	R THE DA	TES CORR	ECTED, SIGN THE STA	ATEMENT I	BELOW AND
RETURN	THIS FORM TO THE DEQ INSI	PECTOR LISTED O	N PAGE 1	ON OR BEF	ORE: 10/25/2024		
					tions for your records.		
I hereby certify t	that the UST violations noted abov	ve have been correct	ed:	Day-14- 10	hun a g Cian atura	/	Data
*TCR: Technical Comp	liance Rate			rermittee/C	wner Signature		Date

## **Petroleum Compliance Services LLC**

# UST Spill Bucket Integrity Testing Form

## **Underground Storage Tanks (UST) Program**

Doc Type: Compliance Certification

**Purpose:** This procedure is to test the leak integrity of single- and double-walled spill buckets. Consult PEI/RP1200, Section 6.2 for hydrostatic test method, Section 6.3 for single-walled vacuum test method, and Section 6.4 for double-walled vacuum test method.

Facility Information	n					
Facility name: Radio Cab	Co.					
Facility address: 1613 NW	/ Kearney St			Facility	ID#: 5173	
BA - Him						
City: Portland			State: OR	Zin co	ode: 97209	**
Owner name: Radio Cab		······································			, do	
Mailing address: 1613 N						
De Head			24-4 OD		07200	
			•	•	ode: 97209	
Phone:			E-mail:			
Testing Informatio	un.					
	11	2				1
Tank number     Product stored	Regular Unleaded	Premium Unleaded				
Spill bucket capacity	5 gal	5 gal				
Manufacturer	EBW	EBW				
	Single-walled	Single-walled	☐ Single-walled	☐ Single-walled	☐ Single-walled	Single-walled
5. Construction	☐ Double-walled  Hydrostatic	☐ Double-walled ■ Hydrostatic	☐ Double-walled ☐ Hydrostatic	☐ Double-walled ☐ Hydrostatic	☐ Double-walled ☐ Hydrostatic	☐ Double-walled ☐ Hydrostatic
	☐ Vácuum	☐ Vacuum	☐ Vacuum	☐ Vacuum	☐ Vácuum	│
6. Test type	☐ Single-walled☐ Double-walled	Single-walled Double-walled	☐ Single-walled ☐ Double-walled	☐ Single-walled ☐ Double-walled	☐ Single-walled ☐ Double-walled	☐ Single-walled☐ Double-walled
	■ Product	Product	Product	☐ Product	☐ Product	Product
7. Spill bucket type	☐ Vapor	☐ Vapor	☐ Vapor	□ Vapor	□ Vapor	☐ Vapor
<ol> <li>Liquid and debris removed from spill bucket:*</li> </ol>	■ Yes □ No	■ Yes □ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
9. Visual inspection (No cracks, loose parts or separation of the bucket from the fill pipe.)?	■ Pass ☐ Fail	■ Pass □ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail
10. Tank riser cap included in test?						☐ Yes ☐ No ☐ NA
11. Is drain valve included in test?						☐ Yes ☐ No ☐ NA
12. Starting level	10"	10"				
13. Test start time	10:00am	10:00am				
14. Ending level	10"	10"				
15. Test end time	11:00am	11:00am				
16. Test period	1 hour	1 hour				
16. Level change	0"	0"				
	Pass Fail	■ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail
Pass/fail criteria: Must pass v inches water column; Vacuur				inch; Vacuum single	-walled only; Maintail	n at least 26
Comments:	·					
* All liquids and debris mu	ist be disposed of p	properly.		1/00000	Diko	
Testing company name:	Petroleum Compli	ance Services LLC		<sub>name:</sub> Kenneth		·····
Date (mm/dd/yyyy):	9-30-2024		Tester's sign	nature: <u>Kennez</u>	th Piks	



× . , 1 .,

# OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY ANNUAL RELEASE DETECTION OPERABILITY TESTING FORM

- > In-tank setup and alarm history reports must be attached to testing form.
- > Maintain three years of testing records.
- > Instructions on how to use this form.

I. FACILITY INFORMATION	– Type or print (in ink) a	ll items.					TEST 9-30-2024	DATE
Facility ID #: 5173		Facility Name: Radio Cab C	Facility Name: Radio Cab Co.					
II. AUTOMATIC TANK GAU	II. AUTOMATIC TANK GAUGE							
ATG Manufacturer: Veeder-R	oot		ATG Model:	TLS-350	·			
Release Detection Method:	Tank Gauge (	0.2 gph leak tests: (□ Contir	uous □Stat	ic)	□SIR		X-Interstitia	l Monitoring
Battery Backup Functional?		Yes	ATG softwa	re properly pro	grammed?		Yes	
ATG alarms functional and au	idible?	Yes	ATG In-Tank	Setup Reports	attached to	form?		
III. TEST PROCEDURE				i e salan				
X - PEI/RP 1200	□ Oregon Testing Procedu	res (Page 2)	□ Manufact	urer Testing Pro	ocedures	□ Other Meti	hod (Describe	)
IV. PROBE AND TESTING I	NFORMATION							
Tank Number	Į.	2						
Product Stored	Regular Unleaded	Premium Unleaded				, , , , , , , , , , , , , , , , , , , ,		
Model	Veeder-Root	Veeder-Root						
Is the ATG console clear of alarms?	Yes	Yes	Yes	No	. Yes	No	Yes	No
Disconnect cable from tank probe. Is appropriate alarm triggered?	Yes	Yes	Yes	No	Yes	No	Yes	No
Tank gauge probes removed and inspected for damage?	Yes	Yes	Yes	No	Yes	No	Yes	No
Residual buildup on floats has been removed?	Yes	Yes	Yes	No	Yes	No	Yes	No
Float(s) move freely?	Yes	Yes	Yes	No	Yes	No	Yes	No
Measured product and water levels match ATG values?	Yes	Yes	Yes	No	Yes	No	Yes	No
Alarm history report attached?	Yes	Yes	Yes	No	Yes	No	Yes	No
V. TEST RESULT	Pass	Pass	Pass	Fall	Pass	Fall	Pass	Fall

Any "No" answer indicates the test failed. Failed tests must be remedied and retested immediately.

Facility ID # 5173

Facility Name: Radio Cab Co.

Test Date: 9-30-2024

VI. SENSORS AND TESTING INFORMATION (liquid	sensors, tan	k interstitial	sensors, etc	.)				
Sensor as identified on tank gauge								
Is sensor in alarm? (If yes, indicate why in the comments section)	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
Sensor installed in the proper location and position?	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
Sensor triggers alarm, at tank gauge, when placed in test liquid	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
When alarm is triggered, the sensor is properly identified on the ATG	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
Alarm history report attached?	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
VII. TEST RESULTS	Pass Fall	Pass Fall	Pass Fall	Pass Fall	Pass Fail	Pass Fall	Pass Fall	Pass Fall

Any "No" answer indicates the test failed. Failed tests must be remedied and retested immediately.

VIII. COMMENTS	
Liquid status attached for passing monthly test.	
XI, Tester	
Person Conducting Testing: Kenneth Pike – Petroleum Compliance Services, LLC	Kenneth Pike

#### **Oregon DEQ Tank Gauge and Probe Functionality Testing Procedures**

- 1. Inspect console and verify that there are no active or recurring warnings or alarms.
- 2. Confirm that both the visual and audible alarms on the tank gauge console function correctly.
- 3. Verify that the correct set-up parameters for the probes and appropriate tank leak detection is programmed correctly.
- 4. Test battery backup (if present).
- Remove tank probe from tank.
- 6. Disconnect probe, wait for "Probe Out" alarm, reconnect probe and reset tank gauge.
- 7. Remove build up from probes.
- 8. Measure the fuel and water contents of the tank and compare with the tank gauge inventory report ensuring that they are the same.
- 9. Ensure that the probe's fuel and water floats are the correct type for the product stored in the tank.
- 10. Reposition the floats, measure distance from bottom of the probe, and utilize tank charts to confirm accuracy of the tank gauge.
- 11. Reinstall probes ensuring that the tank riser cap seals properly and the communication cable seal is tight.
- 12. If tank gauge is equipped with printer, attach the printed tank gauge in-tank setup and alarm history report demonstrating that probes were tested.

#### **Oregon DEQ Sensor Functionality Testing Procedures**

- Inspect sensor for damage.
- 2. Place sensor in at least three inches of testing liquid.
- 3. Verify sensor alarms at tank gauge or sensor has appropriate alarm response (dispenser or turbine shut down).
- 4. Clear alarm.
- 5. Reinstall sensor upon verification of proper operation.
- If tank gauge is equipped with printer, attach the printed tank gauge in-tank setup and alarm history report demonstrating that sensors were tested.

IN TARK HANDS 1 TERRITOR HIGH VATER ALARI SEP 305 2021 10:51 AM

T 20-KEDIUM T 20-KEDIUM HIGH FRODUCT ALARM SEP 30, 2024 10448 AM

IH-TANK ALAKH I .: (PREMIEK HIGH WATEK UAKNIKA SEL :: 00. 2024 10:51 AM

T 2:PREMIUM T 2:PREMIUM Mai PRODUCT ALARM SEP 30, 2024 10:48 AM

IN TABLE SLARN
I 1:UNLEADED
HIGH WATER ALARD
SEF 30. 26:4 [0:5] AN

RAIDO CAR 1610 DM LEARDET PORLADIGOR, 97209 500-227-1212

SEP 30, 20,4 10:38 AM

LIGUID STATUS

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---- IN-TANK ALARO -----T 1:UNLEADED HIGH FRODUCT ALARO SEP 30, 2024 10:48 AN

T 1:00LEADED T 1:00LEADED HIGH WATER WARNING SEP 30: 2024 10:51 AM

L T:SUPER-REG ANNULAR SENSOR NORMAL

\* \* \* \* \* EHE: \* \* \* \* \*

THETANK BLARM ----THETANK BLARM ----THEORIE EADED
NAME PRODUCT BLARM
SEP 300 2024 10:40 AM

RADIO CAE 1613 MA EEARNEN FORLANDICE, 17269 503-227-1212

## **Test Data Official Report For:**

Radio Cab Co. - #5173

Address: 1613 NW Kearney St, Portland, OR 97209

Site Owner: Radio Cab Co., Inc.

## **Date Testing Conducted:**

9-30-2024

## NACE / ICC / DEQ Certified Technician:

Luke Pike / Kenneth Pike

Test included in this report:

Line tightness testing

Line Leak detector testing

Third party tank monitor certification

Manual pulling/sounding of probe floats

Annual release detection form

Probe operability check

Spill bucket testing (in 2024)

Sensor Check

#### DATA CHART FOR USE WITH PETROTITE LINE TESTER

DATE: 9-30-2024

Weather: Sunny

Station: Radio Cab Co. - #5173

Site address: 1613 NW Kearney St, Portland, OR 97209

Owner: Radio Cab Co., Inc.

Operator: Radio Cab Co., Inc.

Line burial depth; 2'

Surface

Reason for test: Annual compliance testing

Special instructions; none

Testing Company: Petroleum Compliance Services LLC.

Temp: 62F

		Ac/o	concrete	Length; 20' to 100'				
Identify each Line tested	Time tested	i	i		Volume Readings ML			
		Before	After	Before	After	Net change	Bleed Back	
Regular Unleaded	Test time 60 minutes	Start PSI 50	PSI 50	400	280			
		PSI 50	PSI 49	280	398	.1	398	
Premium Unleaded	Test time 60 minutes	Start PSI 50	PSI 50	400	250			
		PSI 50	PSI 49	250	398	.1	398	
	Test time	Start PSI	PSI					
		PSI	PSI					
	Test time	Start PSI	PSI				-	
		PSI	PSI					
Test Results	<b>L</b>	SS/FAIL		Volume ML Net Change Date Tester				
	Regular Unle		PASSED PASSED	.1			0-2024 0-2024	
Kennsth Piks Kenneth Pike Tech								

The test results indicate the systems condition at the time of testing.

The results do not carry any implied warranty or guaranty of the system after the test date.

### PETROLEUM COMPLIANCE SERVICES LLC

Office 503-873-4139

## Tank Monitor Annual Third-Party Certification

Make - Veeder-Root TLS-350

PASS	FAIL	N/A
X		
X		
X		
X		
X		
X		***************************************
X		
	X X X X	X

### In Tank Probes-Annual Service.

YES	NO	N/A
X		
X		
X		
	X X X	X X X

#### **Sump Sensors-Annual Services**

Services Performed	YES	NO	N/A
1. Run sensor diagnostic.	X		
2. Inspect sensor cables and connections.	X		•
3. Test sensor floats.	X		
4. Clean and inspect.	X		
-			

NOTES:

## **LINE/ TURBINE INFORMATION**

Lines ID	Regular Unleaded	Premium Unleaded
Piping type: Fiberglass     (S) Single wall (D) Double wall	D	D
2. Pump Type (T) Turbine (S) Suction	T	Т
3. If Turbine is Line Leak Detector present (YES) (NO)	YES	YES
4. Line shut off at Turbine (YES) (NO)	NO USE FE	NO USE FE
5. Turbine operating pressure	29	29

## VISUAL INSPECTION AND MAINTANCE

	YES	NO	N/A	Comments/Observations
Check sumps Water/fuel	X			Dry.
Visual inspect Exposed Piping	X			Piping looks okay.
Emergency stop Location/working	X			
Spill buckets	X			Tested in 2024. Due next in 2027.
PVV vent	X			In place.
Stage one	X			Coax.
Class A	X			
Class C	X			· · · · · · · · · · · · · · · · · · ·
Top off	X			
Clean Valve boxes	X			

NOTES:

# MECHANICAL LEAK DETECTORS TEST RESULTS

DATE: 9-30-2024

Company Performing Test: Petroleum Compliance Service LLC

Tech: Kenneth Pike Client: Radio Cab Co., Inc. Site Name: Radio Cab Co. - #5173

Address: 1613 NW Kearney St, Portland, OR 97209

Type of Leak Detector: VMI 1st Generation  Type of line Tested: Fiberglass  3GPH TEST Results: PASSED  Replaced Leak Detector: NO  If Yes Type of new replacement: Retest:  Product Type: Premium Unleaded  Type of Leak Detector: Vaporless 99 LD-2000  Type of line Tested: Fiberglass  3GPH TEST Results: PASSED  Replaced Leak Detector: NO  If Yes Type of new replacement: Retest:
3GPH TEST Results: PASSED  Replaced Leak Detector: NO  If Yes Type of new replacement: Retest:  Product Type: Premium Unleaded  Type of Leak Detector: Vaporless 99 LD-2000  Type of line Tested: Fiberglass  3GPH TEST Results: PASSED  Replaced Leak Detector: NO
Replaced Leak Detector: NO  If Yes Type of new replacement: Retest:  Product Type: Premium Unleaded  Type of Leak Detector: Vaporless 99 LD-2000  Type of line Tested: Fiberglass  3GPH TEST Results: PASSED  Replaced Leak Detector: NO
If Yes Type of new replacement:  Product Type: Premium Unleaded  Type of Leak Detector: Vaporless 99 LD-2000  Type of line Tested: Fiberglass  3GPH TEST Results: PASSED  Replaced Leak Detector: NO
Product Type: Premium Unleaded Type of Leak Detector: Vaporless 99 LD-2000 Type of line Tested: Fiberglass 3GPH TEST Results: PASSED Replaced Leak Detector: NO
Type of Leak Detector: Vaporless 99 LD-2000  Type of line Tested: Fiberglass  3GPH TEST Results: PASSED  Replaced Leak Detector: NO
Type of Leak Detector: Vaporless 99 LD-2000  Type of line Tested: Fiberglass  3GPH TEST Results: PASSED  Replaced Leak Detector: NO
Type of line Tested: Fiberglass 3GPH TEST Results: PASSED Replaced Leak Detector: NO
3GPH TEST Results: PASSED Replaced Leak Detector: NO
Replaced Leak Detector: NO
•
If Yes Type of new replacement: Retest:
Product Type:
Type of Leak Detector:
Type of line Tested:
3GPH TEST Results:
Replaced Leak Detector:
If Yes Type of new replacement: Retest:
Product Type:
Type of Leak Detector:
Type of line Tested:
3GPH TEST Results:
Replaced Leak Detector:
If Yes Type of new replacement: Retest:

From: GAFFNEY Ingrid \* DEQ

To: LITKE Emily \* DEQ

**Subject:** RE: DEQ UST Inspection Determination: Radio Cab #5173

**Date:** Wednesday, October 9, 2024 7:20:16 AM

#### Got it, thanks

#### Regards,

Ingrid Gaffney
UST Compliance Inspector
DEQ UST Program
700 NE Multnomah St, Ste 600
Portland, OR 97232
<a href="https://www.oregon.gov/deq/Pages/index.aspxshe/her">https://www.oregon.gov/deq/Pages/index.aspxshe/her</a>

**From:** LITKE Emily \* DEQ <Emily.Litke@deq.oregon.gov>

Sent: Tuesday, October 8, 2024 7:19 PM

**To:** GAFFNEY Ingrid \* DEQ <Ingrid.GAFFNEY@deq.oregon.gov> **Subject:** RE: DEQ UST Inspection Determination: Radio Cab #5173

Hey Ingrid

Payment and corrective actions for facility 5173 Radio Cab Co was received 10/7/24.

When you get a chance, can you upload your inspection notes, photos, and inspection notification.

#### **Emily**

From: UST Duty Officer \* DEQ < <u>UST.DutyOfficer@DEQ.oregon.gov</u>>

Sent: Wednesday, September 25, 2024 9:05 AM

**To:** Christina Hanson <<u>claims@radiocab.net</u>>; <u>manager@radiocab.net</u>

**Cc:** LITKE Emily \* DEQ < <a href="mailto:Litke@deq.oregon.gov">Emily.Litke@deq.oregon.gov</a>>

**Subject:** DEQ UST Inspection Determination: Radio Cab #5173

**Importance:** High

#### Hello Radio Cab

Thank you for meeting with DEQ on September 17, 2024 to perform the underground storage tank inspection for 1613 NW Kearney St, Portland, OR 97209.

Since DEQ observed no annual testing for 2023 or 2021 and no tri annual testing for the spill buckets, along with late testing of the overfill. DEQ must issue a field citation, per enforcement guidance. Please see the attached citation.

This field citation will help DEQ keep track of the necessary testing required. The field

citation states Radio Cab has **30 days** to perform or schedule and perform the necessary testing. And pay the fine.

If you require more time, please let the DEQ UST Duty Officer know (see contact below).

Please contact the UST Duty Officer at 503-229-5034 or <a href="mailto:ust.dutyofficer@deq.oregon.gov">ust.dutyofficer@deq.oregon.gov</a> for the investigation and testing and be sure to email the UST duty officer when sending over the final documentation.

#### **CORRECTIVE ACTIONS:**

- Failure to test spill bucket prevention equipment at least once every 3 years.
   Perform required testing to correct violation within 30 days and send results to DEQ. Keep site on testing schedule.
- 2. Failure to complete initial overfill alarm testing requirements by October 1, 2020. Perform required tri annual testing in 2025 and keep site on a schedule. Submit dates to DEQ for 2025 testing.
- 3. Failure to calibrate release detection equipment per manufacturer's instructions, including service checks for operability or running condition. Perform annual testing of line leak detection and tank gauge equipment within 30 days. Submit required testing records (and maintain records) to DEQ within 30 days.
- 4. Failure to maintain adequate records of testing or monitoring equipment calibration, maintenance or repair. Begin keeping records of annual and tri annual testing or monitoring equipment calibration, maintenance or repair. No document submittal necessary

#### Observations of note:

• Ensure that site is tracking all repairs, testing and monthly leak detection records.

#### Regards,

Ingrid Gaffney
UST Compliance Inspector
DEQ UST Program
700 NE Multnomah St, Ste 600
Portland, OR 97232
<a href="https://www.oregon.gov/deq/Pages/index.aspxshe/her">https://www.oregon.gov/deq/Pages/index.aspxshe/her</a>

10T 07 2024



Program Enforcement No. 2024-FC-9555

# **Department of Environmental Quality Underground Storage Tank Program**

# Field Citation For UST Violations

This section for DEQ use only

Quanty	LOI 4	ODI V	Macions		<u> </u>		
					Pag	e 1 of 3	
D	EQ Information		UST	Facility	Information		
Inspection Date:	09/17/2024		Facility ID#:	5173			
Inspector:	Ingrid Gaffney	<u> </u>	Facility Name:	Radio Ca	ab		
DEQ Office:	700 NE Multnomah	St, Ste 600	Facility Address:	1613 NW Kearney St			
	Portland, OR 97232			Portland, OR 97209			
Phone #:	503-875-1246		County:	Multnomah			
Oregon DEQ inspected	the facility listed above	e and identified	the UST violations listed o	on page 3 o	f this Field Cital	tion.	
Field Citation Issue	ed: O In Person	By Mail	l O Both	Date Is	sued: 09/25/202	24	
Facility Representative Pro	esent During Inspection:	Stephen E		Permi	ittee Owne	er 💽 Other 🔑	
Name of Permittee or Ow	ner: Radio Cab Co.,	Inc. Attn: Step	hen Entler	,			
Mailing Address: 161	3 NW Kearney St, F	Portland, OR	97209-2312				
					- Annie Company		
Field Citation Pen	alty – See Page 3 for	detailed listin	ng of each violation.		\$ 850	.00	
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 form							
	to DEQ by the follo				,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
Check one option			DEQ Revenue Section 700 NE Multnomah St Portland, Oregon 972	. #600			
listed field	citation penalty.		violation(s) have occi			ing the	
understan	I do not want to pa d that my file will b ent for formal enfor	e referred t	the expedited enforce of the Department's Oon.	ement po	rocess and Compliance a	nd	
Name: SIEF	HEN P. EX	THER			Owner	Permittee	
Signature:	when I	Mille	<b>y</b>		Date: 9/3	6/2024	
	// · // /		-		/		

**Important** 

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

Department of Environmental Quality (DEQ) Underground Storage Tank Program **UST FIELD CITATION** FACILITY ID: 5173 DATE ISSUED: 09/25/2024 PROGRAM ENFORCEMENT No.: 2024-FC-9555 Page 3 of 3 Violation #1: Failure to test spill bucket prevention equipment at least once every 3 years \*TCR: OY ON Corrective Action: Perform required testing to correct violation within 30 days and send results to DEQ. .00 | Correct Violation by: 10/25/2024 Date Corrected: Rule Citation: **OAR 340-150-**0310(8)(b) Penalty Amount: \$500 Violation #2: Failure to complete initial overfill alarm testing requirements by October 1, 2020 \*TCR: OY ON Perform required tri annual testing in 2025 and keep site on a schedule. Submit dates to DEQ for 2025 testing. Corrective Action: .00 Correct Violation by: 2025 Date Corrected: Rule Citation: OAR 340-150-0310(10) Penalty Amount: \$00 Violation #3: Failure to calibrate release detection equipment per manufacturer's instructions, including service checks for operability or running condition \*TCR: OY ON Corrective Action: Perform annual testing of line leak detection and tank gauge equipment within 30 days. Submit required testing records (and maintain records) to DEQ within 30 days. .00 Correct Violation by: 10/25/2024 Date Corrected: Rule Citation: OAR 340-150- 0400(2) Penalty Amount: \$200 Violation #4: Failure to maintain adequate records of testing or monitoring equipment calibration, maintenance or repair. \*TCR: OY ON Corrective Action: | Begin keeping records of annual and tri annual testing or monitoring equipment calibration, maintenance or repair. No document submittal necessary Date Corrected: Rule Citation: OAR 340-150- -0400(2) Penalty Amount: \$150 .00 Correct Violation by: 10/25/2024 Violation #5: \*TCR: OY ON Corrective Action: Date Corrected: .00 Correct Violation by: Rule Citation: OAR 340-150-Penalty Amount: \$ Violation #6: \*TCR: OY ON Corrective Action: Rule Citation: OAR 340-150-.00 | Correct Violation by: Date Corrected: Penalty Amount: \$ Total Penalty Amount (All Pages): \$850 .00 .00 Total Penalty Amount (This Page): \$850 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: 10/25/2024 Retain a copy of this form and all documentation of corrective actions for your records.

Permittee/Owner Signature

Date

\*TCR: Technical Compliance Rate

I hereby certify that the UST violations noted above have been corrected.