



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5696

FAX (503) 229-6124

TTY 711

September 18, 2024

Time Chrysler Dodge Jeep Ram Portland
Attn: Mindy Giddings
633 NE 12th Ave
Portland, OR 97232-2720

RE: UST Compliance Inspection
DEQ UST #7939 – 633 NE 12th Ave, Portland

Dear Time Chrysler Dodge Jeep Ram Portland:

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 October 30, 2024 starting at approximately 9 am at the DEQ UST #s listed below.

October 30th at 9 am:

- **DEQ UST #7939 -633 NE 12th Ave, Portland**

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 ingrid.gaffney@deq.oregon.gov 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 in-tank alarm reports. Owners also must be able to sound high fill over alarm from the tank gauge, if applicable.

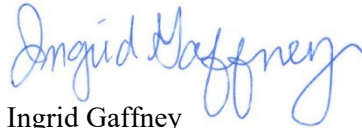
DEQ will not touch any equipment, if you are unable to assist with equipment access, please have your UST Service Provider there. DEQ will need to observe what equipment is in the tank top sumps and under the dispensers. If ball floats are the primary overfill protection device, these will need to be 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 ingrid.gaffney@deq.oregon.gov 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 Gaffney

Date: 10/30/2024

Time: 9 AM

Facility: 7939

I. Site Information

Facility Name: Time Chrysler Dodge Jeep Ram	Permittee: Time Auto Group	Contact: Mindy Giddings
Site Address: 633 NE 12th Ave	Organization: SAME	Phone: 503.336.9549
City: Portland, OR 97232	Phone: SAME	

II. Tank Information

DEQ Permit #	BBKEC				
Estimated Gallons	4000				
TANK material Substance	Coated steel ACE				
Substance	Gasoline				
Tank Install Date	1/15/1991				
Pipe Material	Smith Fiberglass				
Pipe Type	Safe Suction				
Pipe Install Date	1/15/1991				
Overfill Device	Auto Shutoff				

Notes and Comments from the UST database:

☒ Check file before conducting inspection

If tanks are manifolded, which tanks:

III. Operating Certificate

<input checked="" type="checkbox"/> Current	<input checked="" type="checkbox"/> Accurate	<input checked="" type="checkbox"/> Posted for delivery drive to observe	Compliance	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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IV. Operator Training

Class A/B Operator	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Name: Austin Davis	Date: 12/3/2023
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Class C Operator	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Cardlock
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V. Financial Responsibility

Type of coverage: Insurance	Begin Date: 11/17/2023	End Date: 11/17/2024	Compliance	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Coverage amount correct: \$1,000,000.00	Number of tanks covered: 1 (AST waste oil)
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Financial responsibility could also be in the form of self insurance, bonds, local government, trust fund, and or guarantee

VI. Walkthrough Requirements

Spill prevention and release detection equipment checked monthly?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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Tank top sumps checked annually?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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7939

VII. Release Detection

Compliance

☒ Yes ☐ No

a) Annual Release Detection Operability Testing (Sometimes referred to as Tank Gauge Certification)

Date of last testing: 11/3/2023 12/10/2024 Last three tests available? ☐ Yes ☐ No

b) Piping Release Detection (Check all that apply)

☐ Pressurized Piping

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

Date of last testing: N/A Last three tests available? ☐ Yes ☐ No

Number of lines tested: N/A Number of LD tested: NA

Leak detector manufacturer make and model: None

Tank gauge manufacturer make and model: TMS 2000 Pneumercator

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

[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: _____ Last two tests available? ☐ Yes ☐ No

Date of last sensor testing: _____ Last three tests available? ☐ Yes ☐ No

Float sensors installed correctly? ☐ Yes ☐ No

Interstitial space opened to sump? ☐ Yes ☐ No

Presence of water in sumps? ☐ 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

None - ATG NOT on

T1: ☒ Jan ☐ Feb ☐ Mar ☐ Apr ☐ May ☐ Jun ☐ Jul ☐ Aug ☐ Sep ☐ Oct ☐ Nov ☐ Dec
T2: ☒ Jan ☐ Feb ☐ Mar ☐ Apr ☐ May ☐ Jun ☐ Jul ☐ Aug ☐ Sep ☐ Oct ☐ Nov ☐ Dec
T3: ☒ Jan ☐ Feb ☐ Mar ☐ Apr ☐ May ☐ Jun ☐ Jul ☐ Aug ☐ Sep ☐ Oct ☐ Nov ☐ Dec
T4: ☒ Jan ☐ Feb ☐ Mar ☐ Apr ☐ May ☐ Jun ☐ Jul ☐ Aug ☐ Sep ☐ Oct ☐ Nov ☐ Dec
T5: ☒ Jan ☐ Feb ☐ Mar ☐ Apr ☐ May ☐ Jun ☐ Jul ☐ Aug ☐ Sep ☐ Oct ☐ Nov ☐ Dec

Inspector: Ingrid Gaffney

Date: _____

Time: _____

Facility: 7939

VIII. Spill Prevention

Compliance

☒ Yes☐ NoDate(s) of testing: 11/30/2023~~did not own in 2020~~Number of spill buckets tested? 1Did spill bucket pass most recent testing? ☐ Yes☒ NoIf no, was spill bucket replaced/repaired? ☒ Yes ☐ NoDuring inspection, visual damage to spill bucket? ☐ Yes☒ No

Replaced drain valve.

☒ 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☐ NoDate(s) of testing: 11/30/2023did not own in 2020Overfill device pass most recent testing? ☒ Yes ☐ NoIf no, overfill device replaced? ☐ Yes ☐ NoOverfill method that was tested: ☐ Alarm☒ Flapper☐ Ball FloatOverfill AlarmAlarm sounds when tank is 90% full ☐ Yes ☐ NoDriver can see or hear alarm at point of transfer? ☐ Yes ☐ NoSound alarm from tank gauge during inspection? ☐ Yes ☐ NoFlapper ValveTesting verified the valve automatically restricts flow at 95% ☒ Yes ☐ NoVisual observation of flapper on day of inspection? ☒ Yes ☐ NoBall FloatTesting verified the ball float automatically restricts flow at 90% ☐ Yes ☐ NoVisual observation of ball float during inspection? ☐ Yes ☐ No

X. Corrosion Protection

Compliance

☒ Yes☐ No☐ Cathodic☒ Galvanic☐ Impressed CurrentSteel tank with cathodic? ☐ Yes ☐ NoSteel pipes with cathodic? ☐ Yes ☐ NoSteel flex-lines with cathodic? ☐ Yes ☐ No

Date of cathodic test: _____

Last two tests available? ☐ Yes ☐ NoDid last test pass? ☐ Yes ☐ No

If not:

Was failed test reported to DEQ? ☐ Yes ☐ NoWas 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 ☐ NoRectifier log maintained? ☐ Yes ☐ NoRectifier been operating continuously ☐ Yes ☐ No☐ Tank Lining

Date of last test? _____

Pressure test conducted after tank lining inspection? ☐ Yes ☐ No

2019 test notes: piping is not isolated and will cause rapid depletion of galvanic anodes that are protecting the piping

3/15/2016 ✓6/28/2019 ✓3/6/2020

under old owner - 2022

Mascott: Due 2025

XI. General notes from inspection

Bryce Hendon w/ Mascott: 503-477-2654
Dennis Teach

Representative onsite: Mindy Giddings email: mindy@timeauto.com
Austin Davis Adavis@timecdjr.com

* site was purchased and acquired by current operator Nov. 2023. No prior testing shared

* failed spill bucket test 11/30/2023. replaced? drain valve

* tank was pumped out last year for sale by old owner.

* pneumaticator was turned off.

* operating certificate.

* site wants to do temp closure - not doing as of 12/10/2024

12/16/2024 re-visit w/ Mascott.

* spill bucket valve replaced

* new Monitor is needed. Told Austin.

* also told site to do cathodic protection testing asap. would be due in 2025

* issuing warning letter - checked w/ manager Mark Ormin.

Compliance Determination: ☐ No Violations Observed ☒ Observed violations resulting in enforcement

Inspector Signature:

Ingrid Maffey

Date:

12/16/2024



**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
INSPECTION PHOTOLOG**

FACILITY NAME: TIME CHRYSLER DODGE JEEP RAM PORTLAND #7939 Page 1
INSPECTION DATE: December 16, 2024



1: Pneumercator at 633 NE 12th Ave, Portland, OR 97232



2: Bung-hole in tank with meter



**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
INSPECTION PHOTOLOG**

FACILITY NAME: TIME CHRYSLER DODGE JEEP RAM PORTLAND #7939 Page 1
INSPECTION DATE: December 16, 2024



3:



4: Unleaded fill and spill bucket



**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
INSPECTION PHOTOLOG**

FACILITY NAME: TIME CHRYSLER DODGE JEEP RAM PORTLAND #7939 Page 1
INSPECTION DATE: December 16, 2024



5: Tank gauge probe



6: UDC piping



**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
INSPECTION PHOTOLOG**

FACILITY NAME: TIME CHRYSLER DODGE JEEP RAM PORTLAND #7939 Page 1
INSPECTION DATE: December 16, 2024



7: UDCE piping for safe suction



8: UDC



FACILITY NAME: TIME CHRYSLER DODGE JEEP RAM PORTLAND #7939 Page 1
INSPECTION DATE: December 16, 2024





OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
INSPECTION PHOTOLOG

FACILITY NAME: TIME CHRYSLER DODGE JEEP RAM PORTLAND #7939 Page 1
INSPECTION DATE: December 16, 2024



11: Pneumatic TMS2000



12: Printer not functioning in the tank gauge monitor



**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
INSPECTION PHOTOLOG**

FACILITY NAME: TIME CHRYSLER DODGE JEEP RAM PORTLAND #7939 Page 1
INSPECTION DATE: December 16, 2024



13: Tank nest

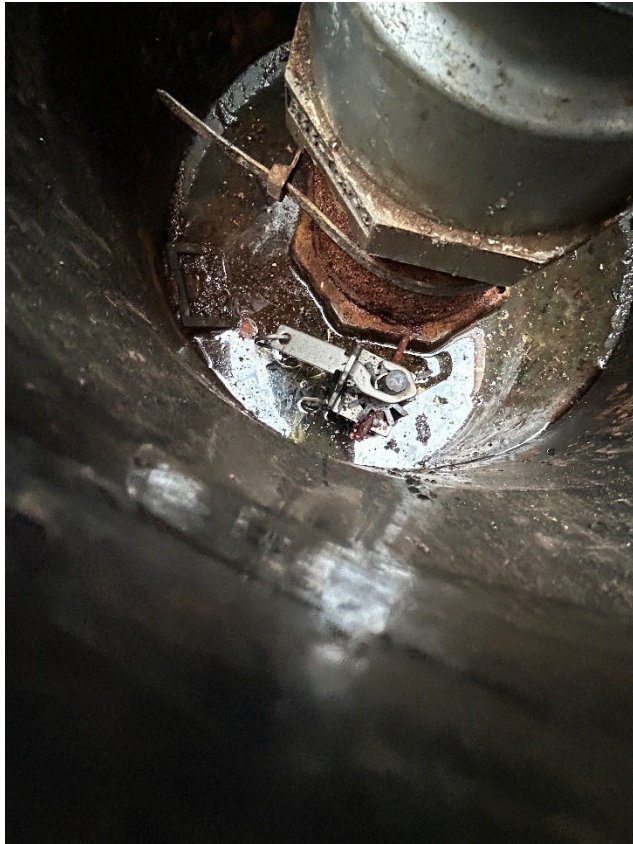


14: Fill cap

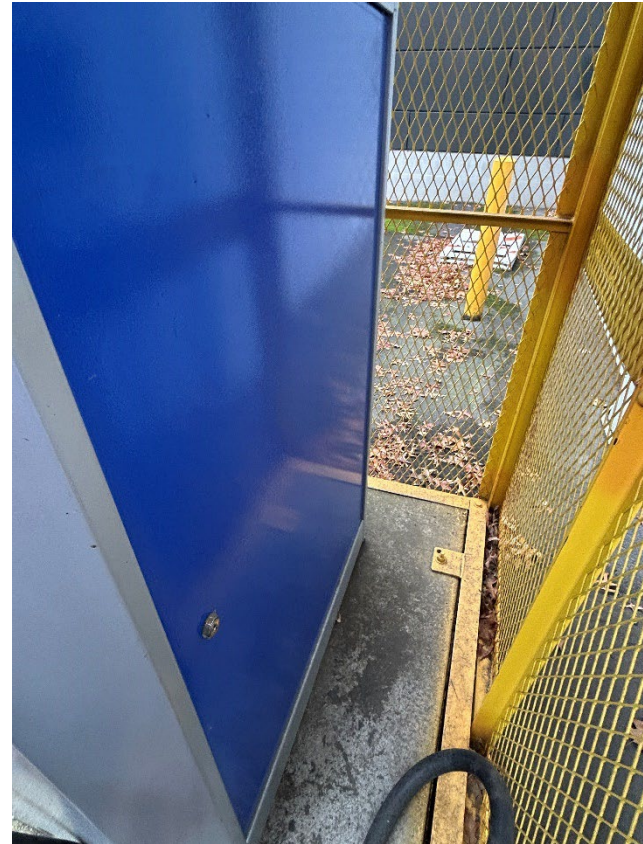


**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
INSPECTION PHOTOLOG**

FACILITY NAME: TIME CHRYSLER DODGE JEEP RAM PORTLAND #7939 Page 1
INSPECTION DATE: December 16, 2024



15: Spill bucket



16: Dispenser area



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

January 7, 2025

Time Chrysler Dodge Jeep Ram Portland
Attn: Mindy Giddings
633 NE 12th Ave
Portland, OR 97232-2720

RE: Warning Letter with Opportunity to Correct
Time Chrysler Dodge Jeep Ram Portland
2025-WL-0001
Facility ID Number #7939
Multnomah County

Dear Time Chrysler Dodge Jeep Ram Portland:

The Oregon Department of Environmental Quality (DEQ) conducted an Underground Storage Tank compliance inspection at the facility located at 633 NE 12th Ave, Portland, Oregon on December 16, 2024. 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 Time Chrysler Dodge Jeep Ram Portland is responsible for the following violation of Oregon environmental law:

VIOLATIONS:

- 1. 340-150-0400(1)(a) Failure to operate or maintain a method or combination of methods for release detection such that the method can detect a release from any portion of the UST system. Class I**

The automatic tank gauge must be on and functioning 24 hours a day, 365 days of the year.

- 2. 340-150-0315(1)(a)(A) Failure to conduct monthly periodic operation and maintenance walkthrough inspection by 10/01/20 and each month thereafter. Class II**

Site must perform monthly walkthrough checklist actions and document with the form provided to the site.

- 3. 340-150-0400(2) Failure to keep Release Detection records at the facility or make them immediately available for review or, if kept off-site, were not available for immediate Review. Class II**

Perform and maintain monthly leak detection records for the site and have available for review.

CORRECTIVE ACTIONS:

1. Maintain/repair or modify (install a new) automatic tank gauge method/equipment within 30 days. Installation/Modification Checklist due 30 days after completion of work. Due February 7th, 2025
2. Complete monthly walkthrough inspection within 30 days. Submit Compliance Certification Statement to DEQ. Due February 7, 2025
3. Submit Release Detection/monthly leak detection records (from the tank gauge) records within 30 days. Inspectors may not be able to determine if the Release Detection method is being properly performed in compliance without these records. Due February 7th, 2025.

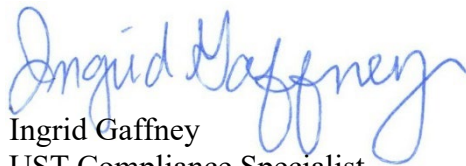
Class I violations are considered to be the most serious violations; Class III violations are considered to be the least serious. If the site requires an extension of the timeline, please notify DEQ.

This notice is a warning letter. Time Chrysler Dodge Jeep Ram Portland has 30 days, February 7th, 2025 to provide a scheduled date or repair/install of the automatic tank gauge and 30 days to perform walkthrough inspection checklist and provide leak detection reports to DEQ. 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 ingrid.gaffney@deq.oregon.gov or by phone at 503-875-1246.

Sincerely,



Ingrid Gaffney
UST Compliance Specialist
Northwest Region



Mascott Equipment Co.
435 NE Hancock Portland, OR 97212
(800) 452-5019

Company Name: _____	Monitor Make: _____
Site Address: _____	Monitor Model: _____
City, State, Zip: _____	Serial Number: _____
Date: _____	Software Version: _____

Console	Tank # / Size	Pass	Fail	Actions Performed / Console	Pass	Fail	N/A	Comments
Print or view status of all tanks. Leave copy on site if any programming changes are made.				Verify date and time				
				Verify setup values				
				Check battery				
				Test external alarm if applicable				
				Run system diagnostics				
				Verify tests for compliance				

Sensors	Sensor # / Location	Pass	Fail	Actions Performed / Probes	Pass	Fail	N/A	Comments
Print out sensor status and leave on site. Put all sensors into alarm and verify proper operation.				Run probe diagnostics				
				Inspect cables and connections				
				Pulled and visually inspected probe				
				Verified overfill function at 90%				

				Actions Performed / Sensors	Pass	Fail	N/A	Comments
				Run sensor diagnostics				
				Inspect cables and connections				
				Test sensor for operation				
				Inspect and clean sensors				

				Additional Service Checks	Yes	No	N/A	Comments
				Lights, LED's, annunciator functioning?				
				Is customer saving required reports?				
				Is Cathodic Protection Required?				
				Note CP issues and test date				
				Type of Overfill Protection				
				Type of Leak Detection				
				Primary Tank Leak Detection Method				

Technician Name: _____ Technician Signature: Bryce Hinden



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) all items.				TEST DATE	
Facility ID #:		Facility Name:			
II. AUTOMATIC TANK GAUGE				<input type="checkbox"/> Pass	<input type="checkbox"/> Fail
ATG Manufacturer:			ATG Model:		
Release Detection Method:		Tank Gauge 0.2 gph leak tests: (<input type="checkbox"/> Continuous <input type="checkbox"/> Static) <input type="checkbox"/> SIR <input type="checkbox"/> Interstitial Monitoring			
Battery Backup Functional? <input type="checkbox"/> Yes <input type="checkbox"/> No		ATG software properly programmed? <input type="checkbox"/> Yes <input type="checkbox"/> No			
ATG alarms functional and audible? <input type="checkbox"/> Yes <input type="checkbox"/> No		ATG In-Tank Setup Reports attached to form? <input type="checkbox"/> Yes			
III. TEST PROCEDURE					
<input type="checkbox"/> PEI/RP 1200	<input type="checkbox"/> Oregon Testing Procedures (Page 2)		<input type="checkbox"/> Manufacturer Testing Procedures	<input type="checkbox"/> Other Method (Describe)	

IV. PROBE AND TESTING INFORMATION

Tank Number					
Product Stored					
Model					
Is the ATG console clear of alarms?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Disconnect cable from tank probe. Is appropriate alarm triggered?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Tank gauge probes removed and inspected for damage?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Residual buildup on floats has been removed?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Float(s) move freely?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Measured product and water levels match ATG values?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Alarm history report attached?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
V. TEST RESULT	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail

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

VIII. COMMENTS

The comments section should be used to note additional information discovered or actions taken during testing that affect compliance

IX. TESTER

Person conducting testing:

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).
5. 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.

DEQ sensor functionality testing procedures

1. 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.
6. If tank gauge is equipped with printer, attach the printed tank gauge in-tank setup and alarm history report demonstrating that sensors were tested.

01/29/25

12:46

Site id

000000

Unit id

01

Current Alarm Status

01/29/25

12:46

Site id

000000

Unit id

01

Leak Sensor Alarms

T		
N		
K		
✓		
O		N
S		A
P		L
		A
		R
		A
		M
		L

THIS GROUP SHOWS THE LEAK SENSORS THAT ARE USED TO DETECT LEAKS IN THE SYSTEM. THE LEAK SENSORS ARE USED TO DETECT LEAKS IN THE SYSTEM.

01 Input X

THIS GROUP SHOWS THE LEAK SENSORS THAT ARE USED TO DETECT LEAKS IN THE SYSTEM. THE LEAK SENSORS ARE USED TO DETECT LEAKS IN THE SYSTEM.

ALARM STATUS KEY

- A = GENERAL ALARM
- F = GENERAL FAULT
- O = OPEN-CIRCUIT FAULT
- P = PRODUCT ALARM
- S = SHORT-CIRC. FAULT
- W = WATER ALARM

01/28/

5
WW
nata



UST WALKTHROUGH INSPECTIONS CHECKLIST

Site Name

Site Address

Tag #

- Initial each box to indicate the equipment was inspected, as described. Use NA if the equipment inspection does not apply to the site.
- Take action for any alarms, damaged equipment and non-normal operating conditions; note actions taken on page 2
- NOTE: Petroleum found in a sump or interstice must be reported to Ecology within 24 hours.

YEAR: _____	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Date of Inspection →												
REQUIRED MONTHLY												
Spill bucket(s) checked for damage and cracks*. Liquid and/or debris removed.												
Fill pipe(s) checked for obstructions. Removed, if found.												
Fill cap(s) securely fitted on fill pipe(s).												
Tank monitor equipment checked for alarms and normal operating condition.												
Leak detection records are reviewed for non-leaking results and kept for three years. Suspected leaks were reported.												
REQUIRED ANNUALLY												
Containment sump(s) checked for damage and presence of liquid. Liquid and/or debris removed.												
If using manual tank gauging, checked condition of tank gauge stick is good (e.g. readable at 1/8" increments throughout).												
RECOMMENDED ACTIVITIES												
Emergency spill response supplies inventoried and restocked if low. Inspected supplies for deterioration.												
Inspected loose fitting, deterioration, obvious signs of leaks and improper function of dispenser hoses, nozzles and breakaways.												

*If a tank receives deliveries at intervals greater than 30 days, the spill bucket check may instead be conducted prior to each delivery. To be eligible for this option, include a copy of each delivery receipt with this form.

Note: This checklist doesn't include the requirement to inspect hydrant pits and piping vaults at airport hydrant systems at least every 30 days.

Use this table to explain actions taken by employees and/or service provider to fix issues. Use additional sheets, as necessary.

Date	Action Taken	Initials
Ex: 3/1/16	Removed water from regular spill bucket into drum for proper disposal. Called service provider to respond to reg unl sensor alarm.	
Ex: 3/8/16	Checked reg unl annular space, found fuel. Called Ecology to report. Product removed 3/9/16. Tank tightness test scheduled 3/10/16. Called Ecology to report test results.	

Keep this record for three years after the last inspection date on the form.

**GALVANIC CATHODIC PROTECTION
EVALUATION CHECKLIST
FOR UNDERGROUND STORAGE TANKS**

UST ID #: _____

County: _____

I. UST FACILITY			II. CERTIFIED CATHODIC PROTECTION TESTER			
Facility Compliance Tag #:			Service Provider Name: G. Druery			
UST ID #:			Company Name: Mascott Equipment Co.			
Site Name: Tillamook CD, R Portland			Address: 435 NE Hancock			
Site Address: 633 NE 12th Ave			City: Portland		State: OR Zip: 97212	
City: Portland, OR 97232			Phone: (503) 282-2587 Email: testing@mascottec.com			
County:			Certification Type: STI/SPFA			
Phone:			Certification Number: CP16791		Exp. Date: 07/13/2026	
III. RESULTS OF EVALUATION (which include results of both continuity and system surveys)						
<div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 15%;"> <input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL </div> <div style="width: 85%;"> <p>The criteria used to evaluate whether cathodic protection is adequate were in accordance with a code of practice developed by a nationally recognized association (e.g. NACE), as required by the</p> </div> </div>						
Date CP Evaluation Performed:						
IV. CRITERIA APPLICABLE TO EVALUATION						
Continuity Survey		<input checked="" type="checkbox"/> PASS – continuity data is passing and no action is needed <input type="checkbox"/> FAIL – continuity data is failing and the system requires a repair or retrofit				
System Survey		# TANKS	# PIPE RUNS	# STP SFC¹_S	# DISP. SFC²_S	
Neg. 850 mV ON	<input checked="" type="checkbox"/> PASS	1				A negative (cathodic) potential of at least -850 mV with the cathodic protection applied. This potential is with respect to a saturated copper-copper sulfate reference electrode containing electrolyte.
	<input type="checkbox"/> FAIL					
Neg. 850 mV Instant Off	<input type="checkbox"/> PASS					A negative polarized potential of at least 850 mV relative to a saturated copper-copper sulfate reference electrode (Instant Off Potential).
	<input type="checkbox"/> FAIL					
100 mV Polarization	<input type="checkbox"/> PASS					A minimum of 100 mV of cathodic polarization between the structure surface and a stable reference electrode contacting the electrolyte.
	<input type="checkbox"/> FAIL					
V. ACTION REQUIRED AS A RESULT OF THIS EVALUATION (check one box and explain further in comment box below)						
<input checked="" type="checkbox"/> NONE		The cathodic protection system is adequately providing protection. No further action is necessary at this time. System must be tested in three years unless more immediate attention is required.				
<input type="checkbox"/> RETEST		The cathodic protection system may not be adequately protecting steel from corroding. Retesting is necessary.				
<input type="checkbox"/> RETROFIT/REPAIR		The cathodic protection system is not adequately providing protection. Retrofitting or repairing is necessary.				
<input type="checkbox"/> RETEST AFTER RETROFIT/REPAIR		The cathodic protection system has been retrofitted or repaired and tested at time of the retrofit/repair. Testing is required again within one to six months after the retrofit or repair.				
Comments (include type of testing gear used, steel components tested, etc.):						

1. If no submersible turbine pump (STP) is present, these steel flex connectors (SFC) are on the tank end of piping.
2. If no dispenser is installed, these SFCs are on the non-tank end of piping.

VI. CONTINUITY SURVEY

Structure "A"	Structure "B"	Point "A" to Point "B" or Fixed Cell Location >30'	Structure "A" Fixed Voltage >30'	Structure "B" Fixed Voltage >30'	Point-to-Point or Fixed Voltage Difference	P A S S	F A I L	Method and Standards Used (e.g. RP-0285, R051)
Tank Bottom	Fill	Remote	-1167mV	-888mV	279mV	<input checked="" type="checkbox"/>	<input type="checkbox"/>	"Fixed" R051
Tank Bottom	Annular riser	Readings	-1167mV	-817mV	350mV	<input checked="" type="checkbox"/>	<input type="checkbox"/>	"Fixed" R051
Tank Bottom	Riser	Taken In	-1167mV	-429mV	738mV	<input checked="" type="checkbox"/>	<input type="checkbox"/>	"Fixed" R051
		Soil 35'				<input type="checkbox"/>	<input type="checkbox"/>	
		West of				<input type="checkbox"/>	<input type="checkbox"/>	
		Tanks				<input type="checkbox"/>	<input type="checkbox"/>	
						<input type="checkbox"/>	<input type="checkbox"/>	
						<input type="checkbox"/>	<input type="checkbox"/>	
						<input type="checkbox"/>	<input type="checkbox"/>	
						<input type="checkbox"/>	<input type="checkbox"/>	
						<input type="checkbox"/>	<input type="checkbox"/>	
						<input type="checkbox"/>	<input type="checkbox"/>	
						<input type="checkbox"/>	<input type="checkbox"/>	

VII. SYSTEM SURVEY

Structure	Contact Point	Half Cell Location	Local Voltage "ON"	Local Voltage "Instant Off"	Remote Voltage "ON" >30'	Local Voltage (Depolarized)	P A S S	F A I L	Method and Standard Used
UST	Tank Bottom	East	-994mV	-1167mV	-1165mV		<input checked="" type="checkbox"/>	<input type="checkbox"/>	-850 on R051
UST	Tank Bottom	Over tank	-1059mV	-1167mV	-1165mV		<input checked="" type="checkbox"/>	<input type="checkbox"/>	-850 on R051
UST	Tank bottom	West	-1045mV	-1167mV	-1165mV		<input checked="" type="checkbox"/>	<input type="checkbox"/>	-850 on R051
							<input type="checkbox"/>	<input type="checkbox"/>	
							<input type="checkbox"/>	<input type="checkbox"/>	
							<input type="checkbox"/>	<input type="checkbox"/>	
							<input type="checkbox"/>	<input type="checkbox"/>	
							<input type="checkbox"/>	<input type="checkbox"/>	
							<input type="checkbox"/>	<input type="checkbox"/>	
							<input type="checkbox"/>	<input type="checkbox"/>	
							<input type="checkbox"/>	<input type="checkbox"/>	
							<input type="checkbox"/>	<input type="checkbox"/>	

IX. RETROFIT OR REPAIR DESIGN (if applicable)

All retrofitting or repairs to CP systems shall be designed by a Corrosion Expert. I certify that I am a Corrosion Expert qualified to engage in the practice of corrosion control on buried or submerged metal piping systems and metal tanks. I have attached copies of the retrofit/repair design and of the Underground Storage Tank Retrofit and Repair Checklist.

Corrosion Expert's Name:

Company's Name:

Nationally Recognized Association:

Certification Number:

Corrosion Expert's Signature:**Date:****X. REQUIRED SIGNATURES**

The certified supervisor certifies the criteria used to evaluate whether cathodic protection is adequate were in accordance with a code of practice developed by a nationally recognized association (e.g. NACE), as required

12/20/2024

Greg Druery

Digitally signed by Greg Druery
DN: cn=Greg Druery, o, ou,
email=gdruery@mascootec.com,
c=US
Date: 2025.01.07 14:13:14 -08'00'

G. Druery

Date

Signature of Certified Supervisor

Print or Type Name

Date

Signature of Tank Owner or Authorized Representative

Print or Type Name

From: [UST Duty Officer * DEQ](#)
To: [GAFFNEY Ingrid * DEQ](#); [UST Duty Officer * DEQ](#)
Subject: RE: DEQ UST Inspection Determination: Time Chrysler Dodge Jeep Ram Portland #7939
Date: Wednesday, January 22, 2025 3:16:00 PM

Thank you for sending these over. I will cross the walkthrough off my list.

I am currently waiting for confirmation that they were able to successfully connect the printer and provide the reports (inventory report from the monitor and alarm history) – or send the installation report for a new ATG.

Making progress...

Emily

From: GAFFNEY Ingrid * DEQ <Ingrid.GAFFNEY@deq.oregon.gov>
Sent: Tuesday, January 21, 2025 11:46 AM
To: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>
Subject: FW: DEQ UST Inspection Determination: Time Chrysler Dodge Jeep Ram Portland #7939

Regards,

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

From: UST Duty Officer * DEQ
Sent: Tuesday, January 7, 2025 12:09 PM
To: Mindy Giddings <mindy@timeauto.com>
Subject: DEQ UST Inspection Determination: Time Chrysler Dodge Jeep Ram Portland #7939

Hello Mindy:

Thank you for your patience and for having Austin and Mascott meet with DEQ to perform the UST inspection at 633 NE 12th Ave, Portland, OR 97232 on December 16, 2024.

Since DEQ observed violations a warning letter with opportunity to correct will be issued to the site. There are no fines associated with this warning; however, the corrections must be met by the date listed or the site must request an extension.

Below is the list of violations and corrections DEQ is requiring.

VIOLATIONS:

1. **G.2 340-150-0400(1)(a) Failure to operate or maintain a method or combination of methods for release detection such that the method can detect a release from any portion of the UST system. Class I**

The automatic tank gauge must be on and functioning 24 hours a day, 365 days of the year. This may require the site to either install a new Automatic Tank Gauge or repair the existing one so it functions for the site's monitoring needs.

2. **A15 340-150-0315(1)(A) Failure to conduct monthly periodic operation and maintenance walkthrough inspection by 10/01/20 and each month thereafter. Class II**

Site must perform monthly walkthrough checklist actions and document them with the form provided at the time of inspection.

3. **G8 340-150-0400(2) Failure to keep Release Detection records at the facility or make them immediately available for review or, if kept off-site, were not available for immediate review. Class II**

Site must perform and maintain monthly leak detection records and have available for review.

CORRECTIVE ACTIONS:

1. Maintain/repair or modify (install a new) automatic tank gauge method/equipment within 30 days. Installation/Modification Checklist due 30 days after completion of work. **Due February 7th, 2025**
2. Complete monthly walkthrough inspection within 30 days. Submit Compliance Certification Statement to DEQ. **Due February 7, 2025**
3. Submit Release Detection/monthly leak detection records (from the tank gauge) records within 30 days. Inspectors may not be able to determine if the Release Detection method is being properly performed in compliance without these records. **Due February 7th, 2025**

Class I violations are considered to be the most serious violations; Class III violations are considered to be the least serious. If the site requires an extension of the timeline, please notify DEQ via the UST Duty office email address: UST.Dutyofficer@deq.oregon.gov

Observations of note and recommendations:

-

- Get signed up for YDO account
- Perform cathodic protection testing since it will be due in 2025. Send results to DEQ via YDO.
- Install a new tank gauge or get the old one repaired per the enforcement.
- Send results of annual testing to DEQ that Mascott was to perform back in December.

Regards,

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

From: [Lyle Giddings](#)
To: [Mindy Giddings](#)
Subject: Re: Perennial alarm readings
Date: Thursday, January 26, 2023, 12:12:50 PM
Attachments: [Screenshot 2023-01-26](#)

Hey Mindy,

Thanks back great. Thank you for sending. I will now mark the corrective actions as complete. There is no reason to have "Perennial" come out to the facility at this point in time.

The LSE inspection for facility 7000 from CONTRACTOR DODGE JEPH PORTLAND is now complete and officially closed.

Thank you for your swift communication and cooperation in keeping your facility in compliance.



Emily Little (she/her)
Safety Officer, Unleashing Storage Tanks
1010 Washington St., 10th Floor, Suite 1000
Portland, Oregon 97204
Tel: 503.464.6464
emily.little@perennial.com

From: Mindy Giddings <emindy@trwautos.com>
Sent: Wednesday, January 25, 2023 3:24 PM
To: Lyle Giddings <Lyle.Giddings@trwautos.com>
Subject: Re: Perennial alarm readings.

Hi Emily,
We did put new info in it last night, hoping this will work?

Please let me know,

Thank you!
Mindy

From: MINDEY GIDDINGS <emindy@trwautos.com>
Sent: Wednesday, January 25, 2023 3:17 PM
To: Mindy Giddings <emindy@trwautos.com>
Subject: