State of Oregon Department of Environmental Quality

Program Enforcement No. 2024-FC-9608

Department of Environmental Quality
Underground Storage Tank Program

Field Citation
For UST Violations

This section for DEQ use only

DEQ Information		UST Facility Information	
Inspection Date:	08/30/2024	**Facility ID#:**	4091
Inspector:	Dylan Eckert	**Facility Name:**	Gas And Snack
DEQ Office:	165 E 7th Ave #100	**Facility Address:**	2212 10th ST
	Eugene, OR 97401		Baker City, OR 97814
Phone #:	503-229-5034	**County:**	Baker

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

Field Citation Issued: ○ **In Person** ◉ **By Email** ☐ **Both** **Date Issued: 03/21/2025**

Facility Representative Present During Inspection: ○ Permittee ○ Owner ○ Other

Name of Permittee or Owner: Fletcher Petroleum, Marla Gardner

Mailing Address: 471 N Curtis Rd Boise, ID83706

Field Citation Penalty – See Page 3 for detailed listing of each violation. $ 1100 .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 following date: 03/21/2025

DEQ Revenue Sectio

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.

Department of Environmental Quality (DEQ) Underground Storage Tank Program

UST FIELD CITATION

DATE ISSUED: 10/08/2024 **PROGRAM ENFORCEMENT NO.:** 2024-FC-9608 **FACILITY ID:** 4091

Violation #1: ***TCR:** ◯Y ◯N	Failure to test spill prevention equipment at least once every 3 years			
Corrective Action:	Submit spill prevention testing records to DEQ			
Rule Citation: **OAR 340-150-** 0310(8)(b)		Penalty Amount: $ 300 .00	Correct Violation by: 11/9/24	Date Corrected:
Violation #2: ***TCR:** ◯Y ◯N	Failure to complete initial overfill, spill prevention or sump testing requirements by October 1, 2020			
Corrective Action:	N/A			
Rule Citation: **OAR 340-150-** 0310(10)		Penalty Amount: $ .00	Correct Violation by: n/a	Date Corrected:
Violation #3: ***TCR:** ◯Y ◯N	Failure to inspect overfill equipment at least once every 3 years.			
Corrective Action:	Records received for testing in July 2023. No additional response required			
Rule Citation: **OAR 340-150-** 0310(1)		Penalty Amount: $ 300 .00	Correct Violation by: n/a	Date Corrected:
Violation #4: ***TCR:** ◯Y ◯N	Failure to perform annual line tightness test on pressurized piping in 2022			
Corrective Action:	Missing 2022 testing records. No additional response required			
Rule Citation: **OAR 340-150-** -410(3)		Penalty Amount: $ 200 .00	Correct Violation by: n/a	Date Corrected:
Violation #5: ***TCR:** ◯Y ◯N	Failure to perform an annual test of operation of line leak detector in 2022			
Corrective Action:	Missing 2022 testing records. No additional response required			
Rule Citation: **OAR 340-150-** 410(2)(c)		Penalty Amount: $ 200 .00	Correct Violation by: n/a	Date Corrected:
Violation #6: ***TCR:** ◯Y ◯N	Failure to install, operate, maintain or calibrate RD equipment per manufacturer's instructions, including service checks for operability or running condition			
Corrective Action:	Missing 2022 testing records. No additional response required			
Rule Citation: **OAR 340-150-** 0400(1)		Penalty Amount: $ 100 .00	Correct Violation by: n/a	Date Corrected:

Total Penalty Amount (This Page): $ 1100 .00 Total Penalty Amount (All Pages): $ 1100 .00

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: 11/09/2024

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*

*TCR: Technical Compliance Rate

Full Compliance Inspection

Submitted by: dylan.eckert_deq

Submitted time: Aug 30, 2024, 12:55:03 PM

Facility Number

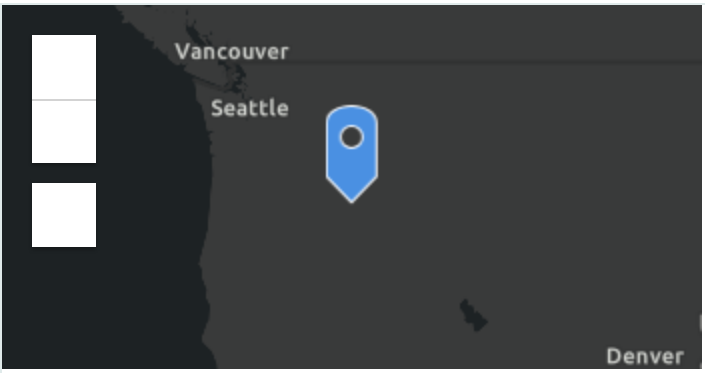
4091

Address

2212 10th Street, Baker City, OR, 97814

Map

Lat: 44.779016 Lon: -117.840558



Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS Powered by Esri

Date

Aug 30, 2024

Time

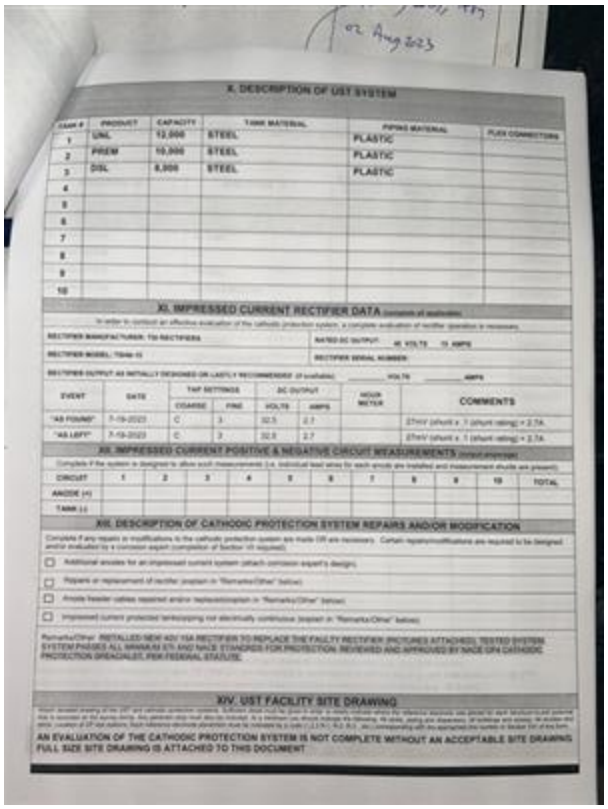
11:51

Compliance Determination

Financial Responsibility

Pass

Photos



X. DESCRIPTION OF UST SYSTEM

TANK #	PRODUCT	CAPACITY	TANK MATERIAL	PIPING MATERIAL	FLEX CONNECTORS
1	UNL	12,000	STEEL	PLASTIC	
2	PREM	10,000	STEEL	PLASTIC	
3	DSL	8,000	STEEL	PLASTIC	
4					
5					
6					
7					
8					
9					
10					

XI. IMPRESSED CURRENT RECTIFIER DATA (complete all applicable)

In order to conduct an effective evaluation of the cathodic protection system, a complete evaluation of rectifier operation is necessary.

RECTIFIER MANUFACTURER: TSI RECTIFIERS — RATED DC OUTPUT: 40 VOLTS 15 AMPS

RECTIFIER MODEL: TSHM-15 — RECTIFIER SERIAL NUMBER:

RECTIFIER OUTPUT AS INITIALLY DESIGNED OR LASTLY RECOMMENDED (if available): _____ VOLTS _____ AMPS

EVENT	DATE	TAP SETTINGS		DC OUTPUT		HOUR METER	COMMENTS
		COARSE	FINE	VOLTS	AMPS		
"AS FOUND"	7-19-2023	C	3	32.5	2.7		(Trim/ (shunt x .1 (shunt rating) = 2.7A.
"AS LEFT"	7-19-2023	C	3	32.5	2.7		(Trim/ (shunt x .1 (shunt rating) = 2.7A.

XII. IMPRESSED CURRENT POSITIVE & NEGATIVE CIRCUIT MEASUREMENTS (check applicable)

Complete if the system is designed to allow such measurements (i.e. individual lead wires for each anode are installed and measurement shunts are present).

CIRCUIT	1	2	3	4	5	6	7	8	9	10	TOTAL
ANODE (+)											
TANK (-)											

XIII. DESCRIPTION OF CATHODIC PROTECTION SYSTEM REPAIRS AND/OR MODIFICATION

Complete if any repairs or modifications to the cathodic protection system are made OR are necessary. Certain repairs/modifications are required to be designed and/or evaluated by a corrosion expert (completion of Section 15 required).

- ☐ Additional anodes for an impressed current system (attach corrosion expert's design).
- ☐ Repairs or replacement of rectifier (explain in "Remarks/Other" below).
- ☐ Anode header cables repaired and/or replaced(explain in "Remarks/Other" below).
- ☐ Impressed current protected tank/piping not electrically continuous (explain in "Remarks/Other" below).

Remarks/Other: INSTALLED NEW 40V 15A RECTIFIER TO REPLACE THE FAULTY RECTIFIER (INCLUDES ATTACHED) TESTED SYSTEM SYSTEM PASSES ALL MINIMUM STI AND NACE STANDRDS FOR PROTECTION. REVIEWED AND APPROVED BY NACE CP4 CATHODIC PROTECTION SPECIALIST, PER FEDERAL STATUTE.

XIV. UST FACILITY SITE DRAWING

Insert accurate drawing of the UST and cathodic protection system. A sketch does not meet the intent of this requirement and will not be accepted as the same facility. Any pertinent data must also be included. It is necessary to show distance between the following: fill ports, piping and dispensers, all buildings and property lines, location of UST tank bottom. Each reference dimension must be indicated by a dim (i.e., 5.0 ft., 8.0 ft., etc.) corresponding with the appropriate line number in Section 15A of this form.

AN EVALUATION OF THE CATHODIC PROTECTION SYSTEM IS NOT COMPLETE WITHOUT AN ACCEPTABLE SITE DRAWING. FULL SIZE SITE DRAWING IS ATTACHED TO THIS DOCUMENT

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IMPRESSED CURRENT CATHODIC PROTECTION SYSTEM EVALUATION
Underground Storage Tank Program

- Access to the soil directly over the cathodically protected structure that is being evaluated must be provided.
- A site drawing depicting the UST cathodic protection system and all reference electrode placements must be completed.

I. UST OWNER

II. UST FACILITY

III. CP TESTER

IV. CP TESTER'S QUALIFICATIONS

V. REASON SURVEY WAS CONDUCTED (check only one)

☐ Routine - 3 year ☐ Routine - within 6 months of installation ☐ 60-day re-survey after fail ☒ Re-survey after repair/modification

Date next cathodic protection survey must be conducted: 7-19-2030 (required within 6 months of installation/repair & every 3 years thereafter)

VI. CATHODIC PROTECTION TESTER'S EVALUATION (check only one)

☒ PASS All protected structures at this facility pass the cathodic protection survey and it is judged that adequate cathodic protection has been provided to the UST system. (Indicate all criteria applicable by completion of Section VIII).

☐ FAIL One or more protected structures at this facility fail the cathodic protection survey and it is judged that adequate cathodic protection has not been provided to the UST system (complete Section IX).

☐ INCONCLUSIVE The cathodic protection survey of an impressed current system must be evaluated by a corrosion expert. (complete Section VII).

CP TESTER'S SIGNATURE:

DATE OF SURVEY PERFORMED: JULY 19, 2023

VII. CORROSION EXPERT'S EVALUATION (check only one)

The survey must be conducted and/or evaluated by a corrosion expert when: a) supplemental anodes or other changes in the construction of the impressed current system are made, b) stray current may be affecting buried metallic structures or c) an inconclusive result was indicated in Section VI.

☒ PASS All protected structures at this facility pass the cathodic protection survey and it is judged that adequate cathodic protection has been provided to the UST system. (Indicate all criteria applicable by completion of Section VIII).

☐ FAIL One or more protected structures at this facility fail the cathodic protection survey and it is judged that adequate cathodic protection has not been provided to the UST system (Indicate what action is necessary by completion of Section IX).

CORROSION EXPERT'S NAME: DALE CLASSEN, P.E., NACE CP4

COMPANY NAME: R&R CATHODIC PROTECTION SERVICE, INC.

NACE INTERNATIONAL CERTIFICATION: CATHODIC PROTECTION SPECIALIST (CP4)

NACE INTERNATIONAL CERTIFICATION NUMBER: CP4 - 6178

CORROSION EXPERT'S SIGNATURE:

DATE: JULY 21, 2023

VIII. CRITERIA APPLICABLE TO EVALUATION (check all that apply)

☒ 850 OFF Structure-to-soil potential more negative than -850 mV with respect to a Cu/CuSO4 reference electrode with protective current temporarily interrupted (instant-off).

☐ 100 mV POLARIZATION Structure(s) exhibit at least 100 mV of cathodic polarization.

IX. ACTION REQUIRED AS A RESULT OF THIS EVALUATION (check only one)

☒ NONE Cathodic protection is adequate. No further action is necessary at this time. Test again by no later than date Section VI).

☐ RETEST Cathodic protection may not be adequate. Retest during the next 90 days to determine if passing results can be achieved.

☐ REPAIR & RETEST Cathodic protection is not adequate. Repair/modification is necessary as soon as practical but within the next 90 days.

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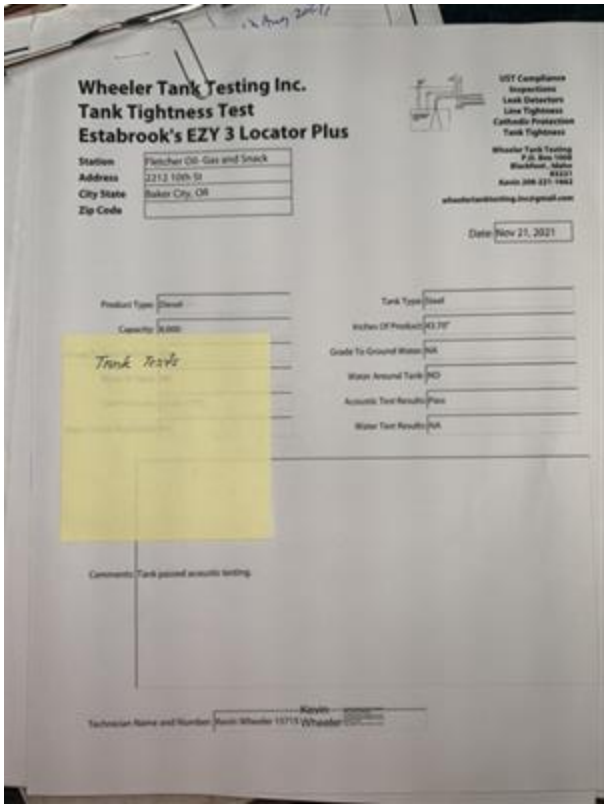

Wheeler Tank Testing Inc.
Tank Tightness Test
Estabrook's EZY 3 Locator Plus

UST Compliance Inspections
Leak Detectors
Line Tightness
Cathodic Protection
Tank Tightness

Wheeler Tank Testing
P.O. Box 1008
Blackfoot, Idaho
83221
Kevin 208-221-1662
wheelertanktesting.inc@gmail.com

Station	Fletcher Oil- Gas and Snack
Address	2212 10th St
City State	Baker City, OR
Zip Code	

Date: Nov 21, 2021

Product Type: Diesel
Capacity: 8,000
Tank Type: Steel
Inches Of Product: 43.75"
Grade To Ground Water: NA
Water Around Tank: NO
Acoustic Test Results: Pass
Water Test Results: NA

Tank #2 #6

Comments: Tank passed acoustic testing.

Technician Name and Number: Kevin Wheeler 10715 Kevin Wheeler

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Measured Off Potentials (Reference & Location)					NOTE: Rectifier tested GOOD on all ranges utilizing 1 Ohm precision resistor to simulate ground bed.
	-1039	-990		FAIL	NOTE: Anode Grounded or Depleted, not functioning. Requires replacement.
	-772	-865		FAIL	
	-802	-795		FAIL	
	-810	-830		FAIL	
	-803	-804		FAIL	
		-788		FAIL	

Determination of FAILED readings (if any):
PASS: Cathodic potential recorded on structure is above -850mV CSE.
FAIL: Cathodic potential recorded is below the minimum -850mV CSE as specified in NACE SP0169. Site site requires immediate repair to return structure to protected state.
N. CSE - Electrical potentials referenced to Cu/SO4 (Copper-Copper Sulfate Half Cell Reference Electrodes) placed in contact with the electrolyte.

CONCLUSIONS & RECOMMENDATIONS
After reviewing the results of our tests, the following conclusions can be made:

1. Rectifier tested GOOD on all ranges utilizing 1 Ohm precision resistor to simulate ground bed.
2. Anode Grounded is depleted, not functioning. Requires replacement.
3. "damaged wires" reports in previous documents refers to old CP wiring, not current system.
4. This rectifier requires a dedicated 20A circuit. Currently has 10A causing system to trip during current interruption. Fletcher should replace 10A with 20A circuit breaker ASAP.
5. CP system has jumper wiring via HMYPE to a series of electrical conduits. These should be removed as the CP system id dedicated to providing protection to the tanks farm and piping only.
6. No other problems with the cathodic protection system are evident.

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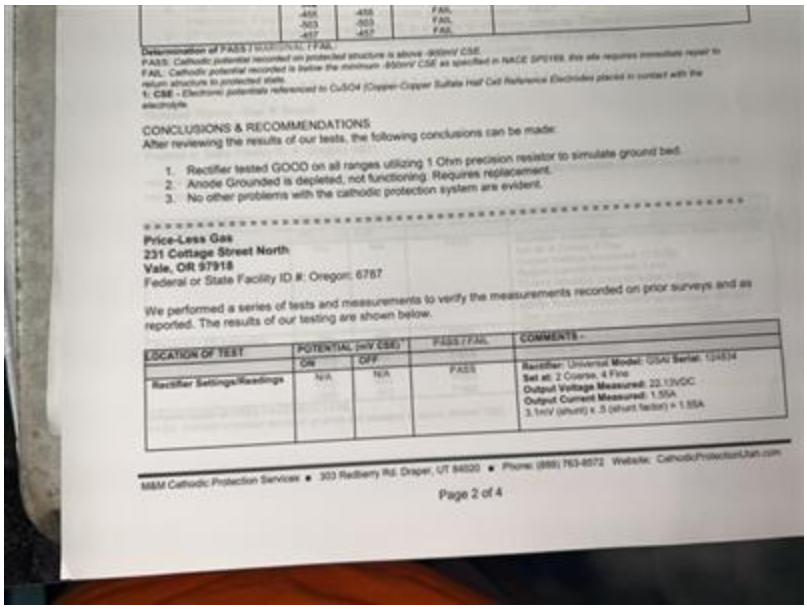

	-455	-456	FAIL
	-503	-503	FAIL
	-457	-457	FAIL

Determination of PASS / MARGINAL / FAIL:
PASS: Cathodic potential recorded on protected structure is above -850mV CSE.
FAIL: Cathodic potential recorded is below the minimum -850mV CSE as specified in NACE SP0169, this site requires immediate repair to return structure to protected state.
1: CSE - Electronic potentials referenced to CuSO4 (Copper-Copper Sulfate Half Cell Reference Electrodes placed in contact with the electrolyte.

CONCLUSIONS & RECOMMENDATIONS
After reviewing the results of our tests, the following conclusions can be made:

1. Rectifier tested GOOD on all ranges utilizing 1 Ohm precision resistor to simulate ground bed.
2. Anode Grounded is depleted, not functioning. Requires replacement.
3. No other problems with the cathodic protection system are evident.

Price-Less Gas
231 Cottage Street North
Vale, OR 97918
Federal or State Facility ID #: Oregon: 6787

We performed a series of tests and measurements to verify the measurements recorded on prior surveys and as reported. The results of our testing are shown below.

LOCATION OF TEST	POTENTIAL (mV CSE)[1]		PASS / FAIL	COMMENTS -
	ON	OFF		
Rectifier Settings/Readings	N/A	N/A	PASS	**Rectifier:** Universal **Model:** GSAI **Serial:** 124834 **Set at:** 2 Coarse, 4 Fine **Output Voltage Measured:** 22.13VDC **Output Current Measured:** 1.55A 3.1mV (shunt) x .5 (shunt factor) = 1.55A

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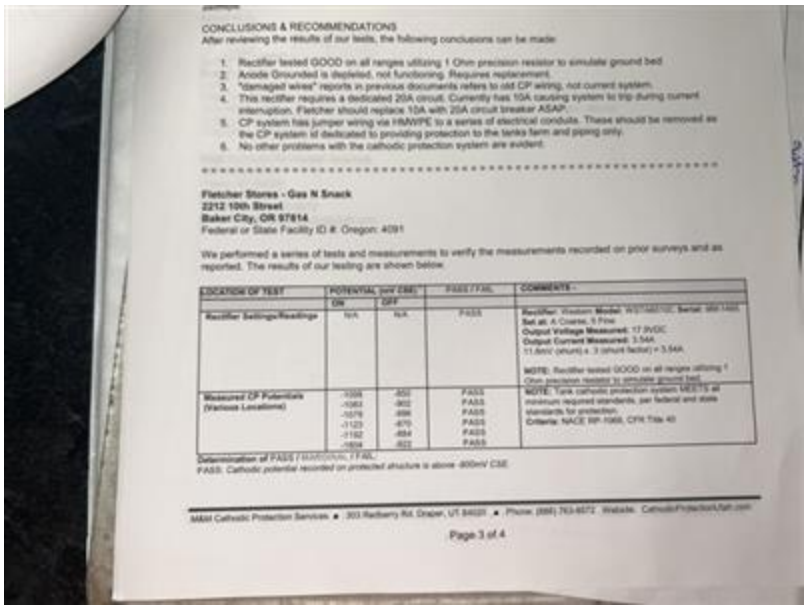

CONCLUSIONS & RECOMMENDATIONS
After reviewing the results of our tests, the following conclusions can be made:

1. Rectifier tested GOOD on all ranges utilizing 1 Ohm precision resistor to simulate ground bed
2. Anode Grounded is depleted, not functioning. Requires replacement.
3. "damaged wires" reports in previous documents refers to old CP wiring, not current system.
4. This rectifier requires a dedicated 20A circuit. Currently has 10A causing system to trip during current interruption. Fletcher should replace 10A with 20A circuit breaker ASAP.
5. CP system has jumper wiring via HMWPE to a series of electrical conduits. These should be removed as the CP system id dedicated to providing protection to the tanks farm and piping only.
6. No other problems with the cathodic protection system are evident.

****

Fletcher Stores - Gas N Snack
2212 10th Street
Baker City, OR 97814
Federal or State Facility ID #: Oregon: 4091

We performed a series of tests and measurements to verify the measurements recorded on prior surveys and as reported. The results of our testing are shown below.

LOCATION OF TEST	POTENTIAL (mV CSE)		PASS / FAIL	COMMENTS -
	ON	OFF		
Rectifier Settings/Readings	N/A	N/A	PASS	**Rectifier:** Western **Model:** WST1500T2C **Serial:** MM-1485 **Set at:** A Coarse, 5 Fine **Output Voltage Measured:** 17.9VDC **Output Current Measured:** 3.54A 11.6mV (shunt) x 3 (shunt factor) = 3.54A **NOTE:** Rectifier tested GOOD on all ranges utilizing 1 Ohm precision resistor to simulate ground bed
Measured CP Potentials (Various Locations)	-1099	-855	PASS	**NOTE:** Tank cathodic protection system MEETS all minimum required standards, per federal and state standards for protection. **Criteria:** NACE RP-1069, CFR Title 49
	-1063	-802	PASS	
	-1079	-896	PASS	
	-1123	-870	PASS	
	-1152	-884	PASS	
	-1804	-822	PASS	

Determination of PASS / MARGINAL / FAIL:
PASS: Cathodic potential recorded on protected structure is above -800mV CSE.

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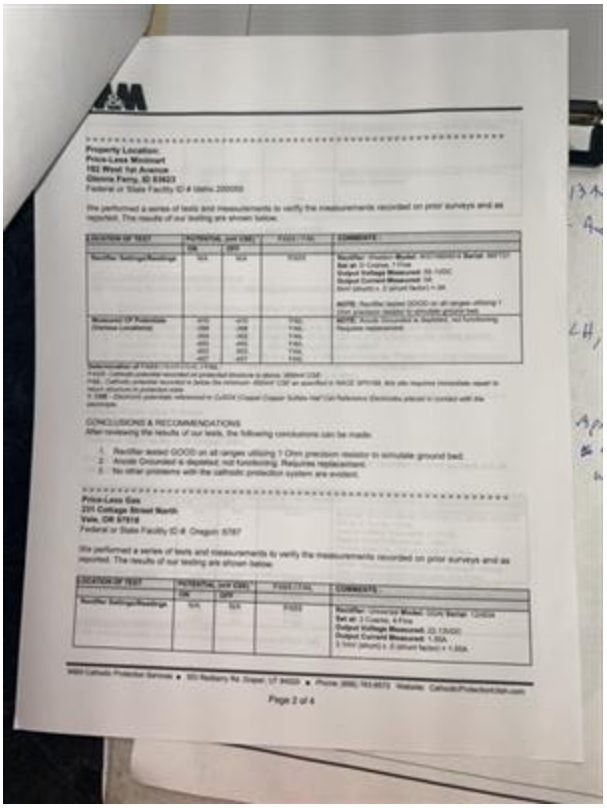

Property Location:
Price-Less Mainart
102 West 1st Avenue
Glenns Ferry, ID 83623
Federal or State Facility ID # Idaho 200000

We performed a series of tests and measurements to verify the measurements recorded on prior surveys and as reported. The results of our testing are shown below.

LOCATION OF TEST	POTENTIAL (mV CSE)		FIGS (1/16)	COMMENTS
	ON	OFF		
Rectifier Settings/Readings	N/A	N/A	91023	Rectifier: Universal Model: 9101160000 S Serial: 597727 Set at: 0 Coarse, 1 Fine Output Voltage Measured: 59.1VDC Output Current Measured: 1A Watt (shunt) x .2 (shunt factor) = 34 NOTE: Rectifier tested GOOD on all ranges utilizing 1 Ohm precision resistor to simulate ground bed.
Measured Off Potentials (Various Locations)	-910	-915	7162	NOTE: Anode Grounded is depleted, not functioning. Requires replacement.
	-908	-908	7164	
	-903	-903	7164	
	-903	-903	7163	
	-903	-903	7164	
	-907	-907	7163	

Determination of FIGS (1/16) (7163)

FIGS - Cathodic potentials recorded on protected structure is above -850mV CSE.
FIGS - Cathodic potential recorded is below the minimum -850mV CSE as specified in NACE SP0169. We also requires immediate repair to return structure to protection state.
(-) CSE - Electrical potentials referenced to Cu/CSH (Copper Copper Sulfate Half Cell Reference Electrode) placed in contact with the electrolyte.

CONCLUSIONS & RECOMMENDATIONS
After reviewing the results of our tests, the following conclusions can be made:

1. Rectifier tested GOOD on all ranges utilizing 1 Ohm precision resistor to simulate ground bed.
2. Anode Grounded is depleted; not functioning. Requires replacement.
3. No other problems with the cathodic protection system are evident.

Price-Less Gas
231 Cottage Street North
Vale, OR 97918
Federal or State Facility ID #: Oregon: 6787

We performed a series of tests and measurements to verify the measurements recorded on prior surveys and as reported. The results of our testing are shown below.

LOCATION OF TEST	POTENTIAL (mV CSE)		FIGS (1/16)	COMMENTS
	ON	OFF		
Rectifier Settings/Readings	N/A	N/A	91023	Rectifier: Universal Model: GGAI Serial: 124534 Set at: 3 Coarse, 4 Fine Output Voltage Measured: 22.13VDC Output Current Measured: 1.55A 3 Volts (shunt) x .5 (shunt factor) = 1.55A

9484 Cathodic Protection Services ■ 351 Redberry Rd. Draper, UT 84020 ■ Phone: (888) 763-6572 Website: CathodicProtectionUtah.com

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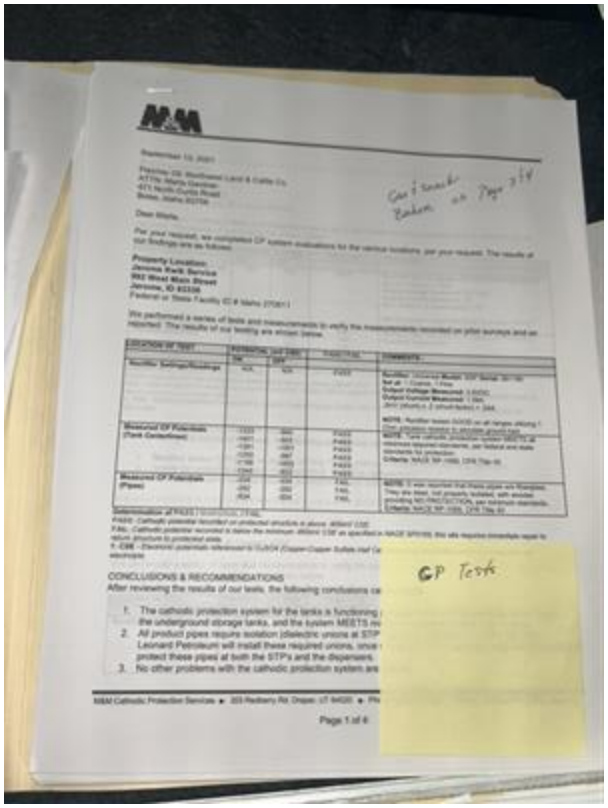

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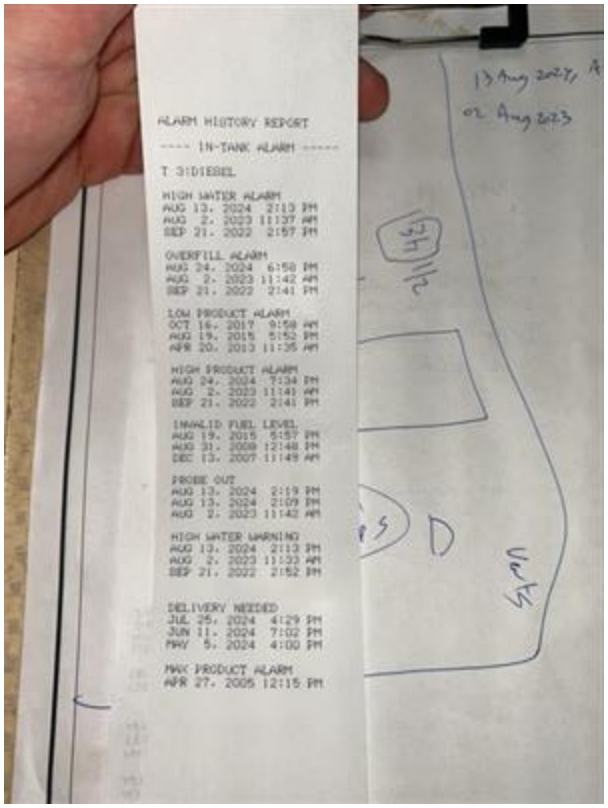

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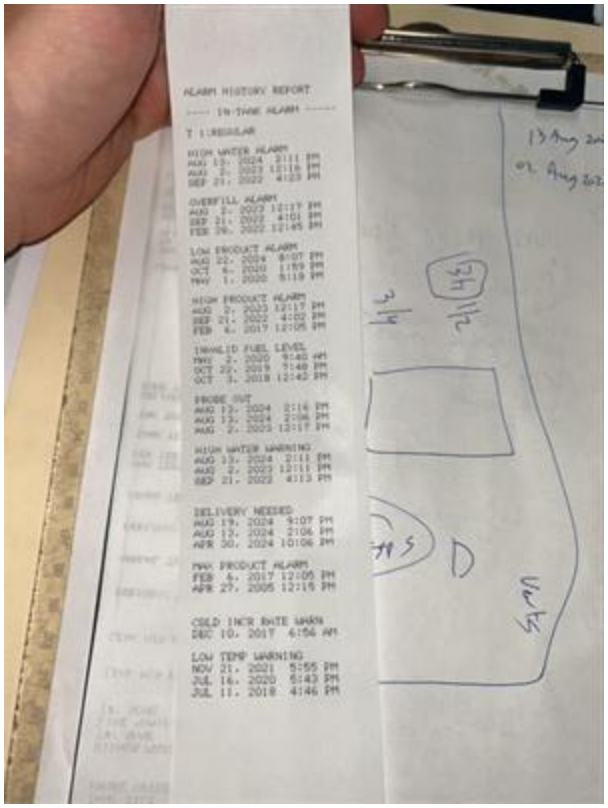

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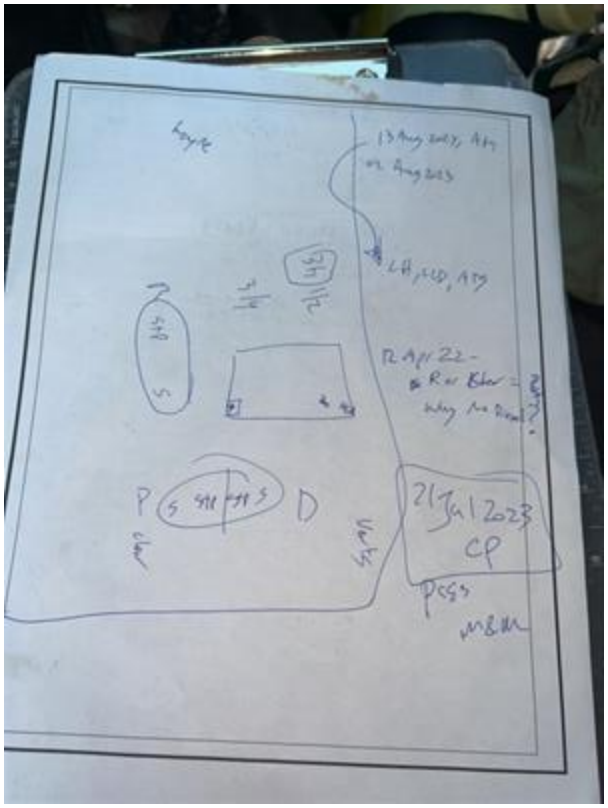

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XVI. IMPRESSED CURRENT CATHODIC PROTECTION SYSTEM SURVEY

STRUCTURE [1]	CONTACT POINT [2]	REFERENCE CELL PLACEMENT [3]	ON [4] mV/mA	INSTANT OFF [5] mV/mA	100 mV POLARIZATION		PASS/FAIL [6]
					polarized mV / mA	100 mV mA/ft²	
1 PLUS TANK	TANK BOTTOM	SOUTH @ REG. TANK STP MANWAY					
2 DIESEL PIPE	DISPENSER 7/8	SOUTH @ DIESEL TANK STP MANWAY					
1 DSL TANK	FILL RISER	BORE HOLE NORTH					PASS
2 DSL TANK	FILL RISER	BORE HOLE CENTER					PASS
3 DSL TANK	FILL RISER	BORE HOLE SOUTH					PASS
4 UNL TANK	FILL RISER	BORE HOLE NORTH					PASS
5 UNL TANK	FILL RISER	BORE HOLE CENTER					PASS
6 UNL TANK	FILL RISER	BORE HOLE SOUTH					PASS
7 PREM TANK	FILL RISER	BORE HOLE NORTH					PASS
8 PREM TANK	FILL RISER	BORE HOLE CENTER					PASS
9 PREM TANK	FILL RISER	BORE HOLE SOUTH					PASS

COMMENTS: INSTALLED NEW 40V 15A RECTIFIER TO REPLACE THE FAULTY RECTIFIER (PICTURES ATTACHED). TESTED SYSTEM. SYSTEM PASSES ALL MINIMUM STD AND NACE STANDRDS FOR PROTECTION. REVIEWED AND APPROVED BY NACE CP4 CATHODIC PROTECTION SPECIALIST, PER FEDERAL STATUTE.

Facility_4091_240830123004_.jpg

XV. IMPRESSED CURRENT CATHODIC PROTECTION SYSTEM CONTINUITY SURVEY

STRUCTURE "A" [1]	STRUCTURE "B" [2]	STRUCTURE "A" FIXED REMOTE INSTANT OFF VOLTAGE [3]	STRUCTURE "B" FIXED REMOTE INSTANT OFF VOLTAGE [4]	POINT-TO-POINT VOLTAGE DIFFERENCE [5]	EVALUATION CONTINUOUS/DISCONTINUOUS [6]
PLUS TANK BOTTOM	PLUS STEEL PRODUCT LINE @ STP	-915 mV	-908 mV	7 mV	CONTINUOUS
PLUS TANK BOTTOM	PLUS STEEL PRODUCT LINE @ STP			7 mV	CONTINUOUS
UNL TANK BOTTOM	FILL RISER			2 mV	CONTINUOUS
UNL TANK BOTTOM	STP			7 mV	CONTINUOUS
UNL TANK BOTTOM	ATG RISER			9 mV	CONTINUOUS
UNL TANK BOTTOM	RECTIFIER NEGATIVE			7 mV	CONTINUOUS
PREM TANK BOTTOM	FILL RISER			4 mV	CONTINUOUS
PREM TANK BOTTOM	STP			21 mV	INCONCLUSIVE
PREM TANK BOTTOM	ATG RISER			3 mV	CONTINUOUS
PREM TANK BOTTOM	RECTIFIER NEGATIVE			2 mV	CONTINUOUS
DSL TANK BOTTOM	FILL RISER			5 mV	CONTINUOUS
DSL TANK BOTTOM	STP			3 mV	CONTINUOUS
DSL TANK BOTTOM	ATG RISER			6 mV	CONTINUOUS
DSL TANK BOTTOM	RECTIFIER NEGATIVE			3 mV	CONTINUOUS

1 Describe the protected structure ("A") that you are attempting to demonstrate is continuous (e.g. plus tank bottom).
2 Describe the "other" protected structure ("B") that you are attempting to demonstrate is continuous (e.g. plus steel product line @ STP).
3 Record the fixed remote instant off structure-to-soil potential of the protected structure ("A") in millivolts (e.g. -915 mV).
4 Record the fixed remote instant off structure-to-soil potential of the "other" protected structure ("B") in millivolts (e.g. -908 mV).
5 Record the voltage difference observed between structure "A" and structure "B" when conducting "point-to-point" testing (e.g. 1mV).
6 Document whether the test (fixed cell and/or point to point) indicated the protected structure was isolated, continuous or inconclusive.

Facility_4091_240830122951_.jpg

Overfill Prevention Inspection, Spill Bucket & Containment Sump Testing

UST Facility				Person conducting the Inspection and/or Testing	
Name:	Gas N Snack	ID#:	4091	Name:	Max Duffy
Street Address	2212 10th St			Company Name:	Fuel System Testing Co.
City:	Baker City	Zip:	97814	Street Address	P.O. Box 1932 - Twin Falls, ID
Site Contact:	Marla Gardner			Phone:	208-546-3063
Phone:	208-377-0024			Email:	office@theftc.net

* Overfill prevention equipment must be inspected every 3 years.

* Spill buckets and containment sumps must be tested every 3 years. Only containment sumps used for interstitial monitoring of piping require testing

* Double-walled spill buckets and containment sumps do not require testing if the integrity of both walls is monitored at least every 30 days

Overfill Prevention Inspection

Identify Tank (number, product type, etc);		1RuLe10	2DSL	3PuL			
Flapper Valve	Make and model	N/A	OPW61SO	N/A			
	Shuts off flow at 95% tank capacity	☐	☑	☐	☐	☐	☐
	Float moves freely, proper orientation, poppet moves into flow path and operates per mfg. design	☐	☑	☐	☐	☐	☐
	If present, bypass valve in the drop tube is open	☐	☐	☐	☐	☐	☐
	Inspection Results (P = pass, F = fail)	F	P	F	—	—	—

Overfill Alarm	Activates at no more than 90% capacity	☐	☐	☐	☐	☐	☐
	Alarm can be seen & heard by delivery driver	☐	☐	☐	☐	☐	☐
	Activates in test mode	☐	☐	☐	☐	☐	☐
	Float moves freely on the stem	☐	☐	☐	☐	☐	☐
	Fuel float level on the ATG agrees with gauge stick reading	☐	☐	☐	☐	☐	☐
	Inch level at which the alarm activates corresponds with value in ATG	☐	☐	☐	☐	☐	☐
	Inspection Results (P = pass, F = fail)	—	—	—	—	—	—
Ball Float	Restricts flow at 90% capacity	☐	☐	☐	☐	☐	☐
	Tank top fittings are vapor-tight	☐	☐	☐	☐	☐	☐
	Ball is free of holes, cracks and moves freely in cage	☐	☐	☐	☐	☐	☐
	Cage is free of debris and is intact	☐	☐	☐	☐	☐	☐
	Inspection Results (P = pass, F = fail)	—	—	—	—	—	—

Ball floats that fail an overfill inspection cannot be replaced for any reason.

Spill Bucket Testing **(passes if water level drops less than 1/8 inch, minimum test time 1 hour)**

☐ **Spill bucket is double-walled and monitored monthly (must be recorded on 30-day walkthrough inspection form)**

Identify tank (tank number, product type, etc.)	1RuLe10	2DSL	3PuL			
Liquid and debris removed from spill bucket* *** Liquid and debris must be disposed of properly**	☑	☑	☑	☐	☐	☐
Water was filled 1.5 inches from top of spill bucket	☑	☐	☑	☐	☐	☐
Starting water level height (inches)	8.5	15" WC	9			
Starting test time	1:37	2:32	2:11			
Ending test time	1:56	2:33	3:11			
Ending water level height (inches)	8	15" WC	9			
Level change	-.5	0	0			
For vacuum testing, 30-inch water column was applied ~~and at least 26-inch water column was maintained after~~ 1 minutes or mfg. procedures	☐	☑	☐	☐	☐	☐
Test Results (P = pass, F = fail)	F	P	P	—	—	—

Containment Sump Testing (passes if water level drops less than 1/8 inch, minimum test time 1 hour)

☐ **Containment sump is double-walled and monitored monthly (must be recorded on 30-day walkthrough inspection form)**

Describe sump (tank number, dispenser number etc.):						
Liquid and debris removed from sump* * Liquid and debris must be disposed of properly	☐	☐	☐	☐	☐	☐
☐ DEQ Alternative Test Method used ** (fill out level change info below) ** See IDAPA 58.01.07.101.02.						
All sensors were tested confirming positive shutdown	☐	☐	☐	☐	☐	☐
☐ PEI RP 1200 Method (fill out level change info below) Water was filled at least 4 inches above the highest penetration fitting	☐	☐	☐	☐	☐	☐
Starting water level height (inches)						
Starting test time						
Ending test time						
Ending water level height (inches)						
Level change						
Test Results (P = pass, F = fail)	—	—	—	—	—	—

Corrective Action

Description of actions taken if items tested or inspected were not acceptable

The RuL spill bucket and flapper valve failed. The liquid level dropped a 1/2” before the test was halfway through. The flapper failed because it is untestable due to the drop tube being unremovable at this time.
The PuL spill bucket passed hydrostatic testing with no issues but the flapper failed because it’s untestable. The fill adaptor is unremovable so the drop tube is stuck as well.
The DSL spilL bucket is double walled and passed vacuum testing all good. The flapper valve passed as well.

Tester’s Signature

Date: February 23, 2022

OPW DOUBLE WALL SPILL CONTAINMENT MANHOLE VACUUM TEST FORM

Customer: Gas & snack

Location: Baker city oregon

Spill Containment Manhole Manufacture: X **OPW**

Date Tested: 4-12-22

We performed a Vacuum test on the Double Wall spill containment manhole, by connecting on the vacuum pump, pulling an initial vacuum of -15" of water column, allowing the spill container to sit for 30 seconds. Pulled another -15" of water column on spill container for 5 minutes and observed
After 5 minutes gauge still showed more than -12" of Water Column.
(PER MANUFACTURES PROTOCAL)

Unl.	**Tank #1 Fill**	**PASS**	/	**FAIL**
	Tank #1 Vapor Recovery	**PASS**	/	**FAIL**
Pre	**Tank #2 Fill**	**PASS**	/	**FAIL**
	Tank #2 Vapor Recovery	**PASS**	/	**FAIL**
	Tank #3 Fill	**PASS**	/	**FAIL**
	Tank #3 Vapor Recovery	**PASS**	/	**FAIL**
	Tank #4 Fill	**PASS**	/	**FAIL**
	Tank #4 Vapor Recovery	**PASS**	/	**FAIL**

Leonard Equipment of Boise: Tony Gallimore DATE 4-12-22
(Required Signature)

Tony gallimore
(Please Print Name Here)

DATE
(Signature)

(Please Print Name Here)

OPW Installation and Maintenance Instructions

OPW DW-VAC-TEST Double Wall Spill Container Vacuum Test Instructions

IMPORTANT: Please read these warnings and use the assembly instructions completely and carefully before starting. Failure to do so may cause product failure, or result in environmental contamination due to liquid leakage into the soil, creating hazardous spill conditions.

IMPORTANT: The OPW DW-VAC-TEST Double Wall Vacuum Tester is pre-assembled for your convenience and ease of use. Check to make sure the unit is intact and undamaged and all parts have been supplied. Never substitute parts for those supplied. Doing so may cause product failure.

WARNING-DANGER: Using electrically operated equipment near gasoline or gasoline vapors may result in a fire or explosion, causing personal injury and property damage. Be sure that the working area is free from such hazards, and always use proper precautions.
NOTE: At all times when product is in the storage tank keep the riser pipe capped, so the vapors cannot escape into the environment.

Notice: OPW products must be used in compliance with applicable federal, state, and local laws and regulations. Product selection should be based on physical specifications and limitations and compatibility with the environment and material to be handled. All illustrations and specifications in this literature are based on the latest production information available at the time of publication. Prices, materials, and specification are subject to change at any time, and models may be discontinued at any time, in either case, without notice or obligation.

Standard Product Warranty

OPW warrants that products sold by it are free from defects in materials and workmanship for a period of one year from the date of manufacture by OPW (ECO products two years from date of manufacture.) Proof of purchase may be required. As the exclusive remedy under this limited warranty, OPW, will at its sole discretion, repair, replace, or issue credit for future orders for any product that may prove defective within the one year date of manufacture period (repairs, replacements, or credits may be subject to prorated warranty for remainder of the original warranty period, complete proper warranty claim documentation required.) This warranty shall not apply to any product that has been altered in any way, which has been repaired by any party other than a service representative authorized by OPW, or when failure is due to misuse, or improper installation or maintenance. OPW shall have no liability whatsoever for special, incidental or consequential damages to any party, and shall have no liability for the cost of labor, freight, excavation, clean up, downtime, removal, reinstallation, loss of profit, or any other cost or charges.

For any product certified to California 2001 standards, OPW warrants that product sold by it are free from defects in material and workmanship for a period of one year from date of manufacture or one year from date of registration of installation not to exceed 15 months from date of manufacture by OPW.

THIS WARRANTY IS IN LIEU OF ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, AND SPECIFICALLY THE WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE. THERE ARE NO WARRANTIES, WHICH EXTEND BEYOND THE DESCRIPTION ON THE FACE HEREOF.

OPERATION INSTRUCTIONS:

Step 1: (See Figure 2)
Attach vacuum pump to gauge assembly using the Quick Connect Fitting.

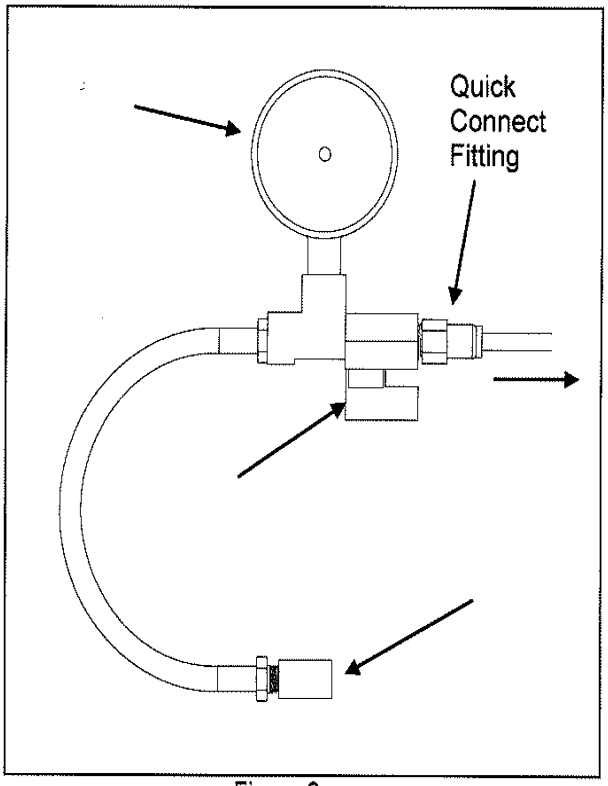

Figure 2

Step 2: (See Figure 3)
Make sure Test Valve is clean.
Connect Test Adaptor to Test Valve on OPW 1-3100 Series Double Wall Spill Container.

Step 3: (See Figure 2)
Make sure that the ball valve on the DW-VAC-TEST is open and use the pump to increase the vacuum to -15 inches of water column as displayed on vacuum gauge.

Step 4:
Close ball valve when -15 inches of water column is displayed on the vacuum gauge. Allow spill container to sit for 30 seconds. Refill spill container to -15 inches of water column.

Step 5:
Leave the spill container undisturbed for 5 minutes while under vacuum.

Step 6:
Check vacuum gauge after 5 minutes. If gauge does not show 12 or more inches of water column, the spill container has failed the test.

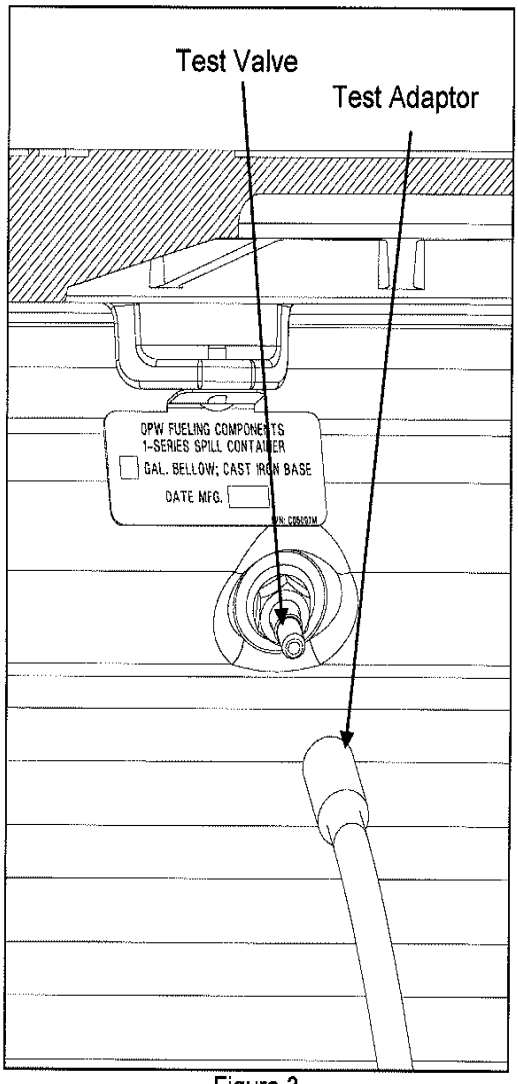

Figure 3

NOTE: Keep the temperature of the unit constant during testing. Fluctuations in temperature of the unit could result in bias results.

Fuel System Testing and Compliance
PO Box 1932
Twin Falls, ID 83303-1932

Date Created: 07/31/2023 11:30 AM

WORK ORDER WO-5519

Customer

Name:	Leonard Petroleum Equipment of Boise	**Contact:**	Leonard Petroleum Equipment of Boise
Site Address:	Fletchers- Gas N Snacks		(208) 336-1155
	2212 10th St.		
	Baker City, OR 97814		
Billing Address:	PO Box 170219 Boise, ID 83717		

Problem

Inspection Services DEQ Monthly Inspection/ Large — Done
conduct monthly DEQ inspection

Annual Testing Services LLD Testing x 3 — Done
MLLD

Annual Testing Services Precision Line Testing x 3 — Done
-

Annual Testing Services Release Detection Testing — Done
EMC

DEQ #:	4091
Arrival Time:	8:00 AM
Departure Time:	1:30 PM
Regular Hours:	5.5
Time Allocated to Each Type of Testing for Billing:	3 hr Line Testing .5 hr LLD Testing 1 hr Release Detection 1 hr Inspection, Cleanup, Misc.
Grey Absorbents:	8
Misc.Truck Supplies:	1
Additional Parts Used:	1 Nitrogen 1 PM2 Rig 1 LLD Tester

Assignment

Primary Tech:	Max Duffy
Secondary Tech(s):	Cade Jones
Priority:	Non Urgent
Work Duration:	9 hr 30 min
Appointment Type:	Scheduled
Promised Arrival Time:	08/02/2023 8:00 AM

Work Done

Description: Fletchers Gas and Snack

Arrived and informed the employees of the testing were were there to do. Setup at dispenser 1-2. Ran precision line tests on the RuL, PuL, and DSL product lines. Used the ball valves to isolate for each line test. Sent the test data off Leighton O'Brien. Tested the MLLD's for the RuL, PuL, and DSL product lines. All three leak detectors passed the testing.

Got the keys for the padlocks. Pulled the probes for all tanks and set off the overfill alarm. There are no sensors in use at this site. Obtained setup reports and alarm printouts from the ATG. Exterior Overfill Alarm is just a loud speaker box that can be heard from the tank pad. There's no light on the box. Alarm is behind a wall that was an addition onto the original c store building. It can still be heard loudly. The ATG console, tank probes, and overfill alarm passed the testing.

Inspected all of the spill buckets, STP sumps, and UDC's. Cleaned and dried some blended fuels in the spill buckets and STP sumps. Cleaned up and took pictures.

Invoice

No Invoice

Notes

08/24/2023 | Max Duffy | Picture note

WO# WO-5519 Picture Note

08/24/2023 | Max Duffy | Picture note

WO# WO-5519 Picture Note

08/24/2023 | Max Duffy | Picture note

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08/24/2023 | Max Duffy | Picture note

WO# WO-5519 Picture Note

08/24/2023 | Max Duffy | Picture note

WO# WO-5519 Picture Note

Attachments

08/02/2023 | Signature | Work Order Signature Aug 2, 2023 2:22 PM

Times Posted

Primary Tech:	**En Route**	**Work**
Max Duffy	-	552:03
Secondary Tech(s):		
Cade Jones	-	-

IN-TANK SETUP

T 1:REGULAR
PRODUCT CODE : 1
THERMAL COEFF :.000700
TANK DIAMETER : 95.00
TANK PROFILE : 4 PTS
FULL VOL : 12000
71.3 INCH VOL : 9445
47.5 INCH VOL : 5812
23.8 INCH VOL : 2338

FLOAT SIZE: 4.0 IN.

WATER WARNING : 2.0
HIGH WATER LIMIT: 3.0

MAX OR LABEL VOL: 12000
OVERFILL LIMIT : 90%
: 10800
HIGH PRODUCT : 95%
: 11400
DELIVERY LIMIT : 20%
: 2400

LOW PRODUCT : 1000
LEAK ALARM LIMIT: 8
SUDDEN LOSS LIMIT: 25
TANK TILT : 0.00
PROBE OFFSET : 0.00

SIPHON MANIFOLDED TANKS
T#: NONE
LINE MANIFOLDED TANKS
T#: NONE

LEAK MIN PERIODIC: 30%
: 3600
LEAK MIN ANNUAL : 95%
: 11400

PERIODIC TEST TYPE
STANDARD

ANNUAL TEST FAIL
ALARM DISABLED

PERIODIC TEST FAIL
ALARM DISABLED

GROSS TEST FAIL
ALARM DISABLED

ANN TEST AVERAGING: OFF
PER TEST AVERAGING: OFF

TANK TEST NOTIFY: OFF

TNK TST SIPHON BREAK:OFF

DELIVERY DELAY : 5 MIN
PUMP THRESHOLD : 10.00%

T 2:ULTIMA
PRODUCT CODE : 2
THERMAL COEFF :.000700
TANK DIAMETER : 95.00
TANK PROFILE : 4 PTS
FULL VOL : 10200
71.3 INCH VOL : 8264
47.5 INCH VOL : 5086
23.8 INCH VOL : 2045

FLOAT SIZE: 4.0 IN.

WATER WARNING : 2.0
HIGH WATER LIMIT: 3.0

MAX OR LABEL VOL: 10200
OVERFILL LIMIT : 90%
: 9180
HIGH PRODUCT : 95%
: 9690
DELIVERY LIMIT : 20%
: 2040

LOW PRODUCT : 848
LEAK ALARM LIMIT: 8
SUDDEN LOSS LIMIT: 25
TANK TILT : 1.00
PROBE OFFSET : 0.00

SIPHON MANIFOLDED TANKS
T#: NONE
LINE MANIFOLDED TANKS
T#: NONE

LEAK MIN PERIODIC: 30%
: 3060
LEAK MIN ANNUAL : 95%
: 9690

PERIODIC TEST TYPE
STANDARD

ANNUAL TEST FAIL
ALARM DISABLED

PERIODIC TEST FAIL
ALARM DISABLED

GROSS TEST FAIL
ALARM DISABLED

ANN TEST AVERAGING: OFF
PER TEST AVERAGING: OFF

TANK TEST NOTIFY: OFF

TNK TST SIPHON BREAK:OFF

DELIVERY DELAY : 5 MIN
PUMP THRESHOLD : 10.00%

T 3:DIESEL
PRODUCT CODE : 3
THERMAL COEFF :.000450
TANK DIAMETER : 95.00
TANK PROFILE : 4 PTS
FULL VOL : 8000
71.3 INCH VOL : 6493
47.5 INCH VOL : 3996
23.8 INCH VOL : 1607

FLOAT SIZE: 4.0 IN.

WATER WARNING : 2.0
HIGH WATER LIMIT: 3.0

MAX OR LABEL VOL: 8000
OVERFILL LIMIT : 90%
: 7200
HIGH PRODUCT : 95%
: 7600
DELIVERY LIMIT : 20%
: 1600

LOW PRODUCT : 667
LEAK ALARM LIMIT: 8
SUDDEN LOSS LIMIT: 25
TANK TILT : 0.00
PROBE OFFSET : 0.00

SIPHON MANIFOLDED TANKS
T#: NONE
LINE MANIFOLDED TANKS
T#: NONE

LEAK MIN PERIODIC: 30%
: 2400
LEAK MIN ANNUAL : 95%
: 7600

PERIODIC TEST TYPE
STANDARD

ANNUAL TEST FAIL
ALARM DISABLED

PERIODIC TEST FAIL
ALARM DISABLED

GROSS TEST FAIL
ALARM DISABLED

ANN TEST AVERAGING: OFF
PER TEST AVERAGING: OFF

TANK TEST NOTIFY: OFF

TNK TST SIPHON BREAK:OFF

DELIVERY DELAY : 5 MIN
PUMP THRESHOLD : 10.00%

SYSTEM SETUP
- - - - - - - - - - - - - - - -
AUG 2, 2023 11:12 AM

SYSTEM UNITS
U.S.
SYSTEM LANGUAGE
ENGLISH
SYSTEM DATE/TIME FORMAT
MON DD YYYY HH:MM:SS xM

GAS AND SNACK
2212 TENTH STREET
BAKER CITY,OR
5415236984

SHIFT TIME 1 : DISABLED
SHIFT TIME 2 : DISABLED
SHIFT TIME 3 : DISABLED
SHIFT TIME 4 : DISABLED

TANK PER TST NEEDED WRN
DISABLED
TANK ANN TST NEEDED WRN
DISABLED
LINE PER TST NEEDED WRN
DISABLED
LINE ANN TST NEEDED WRN
DISABLED

PRINT TC VOLUMES
ENABLED

TEMP COMPENSATION
VALUE (DEG F): 60.0
STICK HEIGHT OFFSET
DISABLED

H-PROTOCOL DATA FORMAT
HEIGHT
DAYLIGHT SAVING TIME
ENABLED
START DATE
APR WEEK 1 SUN
START TIME
2:00 AM
END DATE
OCT WEEK 6 SUN
END TIME
2:00 AM

RE-DIRECT LOCAL PRINTOUT
DISABLED

EURO PROTOCOL PREFIX
S

SYSTEM SECURITY
CODE : 000000

CUSTOM ALARM LABELS
DISABLED

COMMUNICATIONS SETUP
- - - - - - - - - - - - - - - -

PORT SETTINGS:

COMM BOARD : 2 (RS-232)
BAUD RATE : 9600
PARITY : EVEN
STOP BIT : 1 STOP
DATA LENGTH: 7 DATA
RS-232 SECURITY
CODE : DISABLED

AUTO TRANSMIT SETTINGS:

AUTO LEAK ALARM LIMIT
DISABLED
AUTO HIGH WATER LIMIT
DISABLED
AUTO OVERFILL LIMIT
DISABLED
AUTO LOW PRODUCT
DISABLED
AUTO THEFT LIMIT
DISABLED
AUTO DELIVERY START
DISABLED
AUTO DELIVERY END
DISABLED
AUTO EXTERNAL INPUT ON
DISABLED
AUTO EXTERNAL INPUT OFF
DISABLED
AUTO SENSOR FUEL ALARM
DISABLED
AUTO SENSOR WATER ALARM
DISABLED
AUTO SENSOR OUT ALARM
DISABLED

RS-232 END OF MESSAGE
DISABLED

LEAK TEST METHOD
- - - - - - - - - - - - - - - -
TEST CSLD : ALL TANK
Pd = 99%
CLIMATE FACTOR:MODERATE

REPORT ONLY:
DISABLED

TST EARLY STOP:ENABLED

LEAK TEST REPORT FORMAT
ENHANCED

LIQUID SENSOR SETUP
- - - - - - - - - - - - - - - -
NONE

EXTERNAL INPUT SETUP
- - - - - - - - - - - - - - - -
NONE

OUTPUT RELAY SETUP
- - - - - - - - - - - - - - - -

R 1:OVERFILL ALARM
TYPE:
STANDARD
NORMALLY OPEN

IN-TANK ALARMS
ALL:OVERFILL ALARM

SOFTWARE REVISION LEVEL
VERSION 423.01
SOFTWARE# 346423-100-B
CREATED - 02.06.21.13.18

S-MODULE# 330161-003-A
SYSTEM FEATURES:
PERIODIC IN-TANK TESTS
ANNUAL IN-TANK TESTS
CSLD

GAS AND SNACK
2212 TENTH STREET
BAKER CITY,OR
5415236984

AUG 2, 2023 11:12 AM

SYSTEM STATUS REPORT

T 2:DELIVERY NEEDED

GAS AND SNACK
2212 TENTH STREET
BAKER CITY,OR
5415236984

AUG 2, 2023 11:12 AM

INVENTORY REPORT

T 1:REGULAR
VOLUME = 2769 GALS
ULLAGE = 9231 GALS
90% ULLAGE= 8031 GALS
TC VOLUME = 2755 GALS
HEIGHT = 26.81 INCHES
WATER VOL = 0 GALS
WATER = 0.00 INCHES
TEMP = 67.4 DEG F

T 2:ULTIMA
VOLUME = 1862 GALS
ULLAGE = 8338 GALS
90% ULLAGE= 7318 GALS
TC VOLUME = 1852 GALS
HEIGHT = 22.19 INCHES
WATER VOL = 0 GALS
WATER = 0.00 INCHES
TEMP = 67.4 DEG F

T 3:DIESEL
VOLUME = 3564 GALS
ULLAGE = 4436 GALS
90% ULLAGE= 3636 GALS
TC VOLUME = 3548 GALS
HEIGHT = 43.35 INCHES
WATER VOL = 12 GALS
WATER = 0.78 INCHES
TEMP = 69.9 DEG F

* * * * * END * * * * *

GAS AND SNACK
2212 TENTH STREET
BAKER CITY,OR
5415236984

AUG 2, 2023 11:12 AM

CSLD TEST RESULTS

AUG 2, 2023 11:12 AM

T 1:REGULAR
PROBE SERIAL NUM 811476

0.2 GAL/HR TEST
PER: AUG 2, 2023 PASS

T 2:ULTIMA
PROBE SERIAL NUM 811477

0.2 GAL/HR TEST
PER: AUG 2, 2023 PASS

T 3:DIESEL
PROBE SERIAL NUM 811478

0.2 GAL/HR TEST
PER: AUG 2, 2023 PASS

* * * * * END * * * * *

GAS AND SNACK
2212 TENTH STREET
BAKER CITY,OR
5415236984

AUG 2, 2023 11:12 AM

LIQUID STATUS

AUG 2, 2023 11:12 AM

NONE

* * * * * END * * * * *

Wayne

PRESSURE STEP TEST

G.P.H. TEST

[1] CALIBRATE

DISPENSER NOZZLE

[3] CALIBRATE -CALIBRATION- [2] CALIBRATE

psi

Vaporless Manufacturing, Inc.

LDT-890 Leak Detector Tester

Installation & Operation Protocol

October 1st, 2006

Installing LDT-890

Check for Leaks

Purging Test System

Leak Test: Phase 1- Calibrating a leak at 10 PSI

Bleed-back Test

Step-through Tune

Leak Test: Phase 2 (use the leak detector search for and find a leak.

Explanation of Leak Search Pressure Ranges

Disconnecting LDT-890

Diagnostics

MODEL LDT-890 AF\RF

LEAK DETECTOR TESTER

SERIAL NO: 15614

Vapor

WARNING: DO NOT DISASSEMBLE

FACTORY RECALIBRATION REQUIRED EVERY TWO YEARS

LDT-890 / LDT-890 LAE FACTORY RECALIBRATION SERVICES

PERFORMED ON 7-23-25 BY W.E

TO ENSURE VALID TEST RESULTS, UNIT REQUIRES FACTORY RECALIBRATION EVERY TWO YEARS.

Gallons to Milliliters Conversion Chart

Gallons Per Hour	Ml. Per Minute	Ml. Per 1/2 Minute
1	63	32
1.2	76	38
1.4	88	44
1.6	101	51
1.8	114	57
2	126	63
2.2	139	70
2.4	151	76
2.6	164	82
2.8	177	89
3	189	95
3.2	202	101
3.4	214	108
3.6	227	114
3.8	239	120
4	252	127
4.2	265	133
4.4	277	139
4.6	290	146
4.8	302	152
5	315	158
5.2	328	165
5.4	340	171
5.6	353	177
5.8	365	184
6	378	190
6.2	391	196
6.4	403	203
6.6	416	209
6.8	428	215
7	441	222
7.2	454	228
7.4	466	234
7.6	479	241
7.8	491	247
8	504	253
8.2	517	260
8.4	529	266
8.6	542	272
8.8	554	279
9	567	285
9.2	580	291
9.4	592	298
9.6	605	304
9.8	617	310
10	630	317

Rul

---- IN-TANK ALARM -----
T 1:REGULAR
HIGH WATER WARNING
AUG 2, 2023 12:11 PM

---- IN-TANK ALARM -----
T 1:REGULAR
HIGH WATER ALARM
AUG 2, 2023 12:16 PM

---- IN-TANK ALARM -----
T 1:REGULAR
OVERFILL ALARM
AUG 2, 2023 12:17 PM

---- IN-TANK ALARM -----
T 1:REGULAR
HIGH PRODUCT ALARM
AUG 2, 2023 12:17 PM

---- IN-TANK ALARM -----
T 2:ULTIMA
HIGH WATER ALARM
AUG 2, 2023 11:51 AM

---- IN-TANK ALARM -----
T 2:ULTIMA
HIGH WATER WARNING
AUG 2, 2023 11:51 AM

---- IN-TANK ALARM -----
T 2:ULTIMA
HIGH PRODUCT ALARM
AUG 2, 2023 11:51 AM

---- IN-TANK ALARM -----
T 2:ULTIMA
OVERFILL ALARM
AUG 2, 2023 11:52 AM

---- IN-TANK ALARM -----
T 3:DIESEL
HIGH WATER ALARM
AUG 2. 2023 11:37 AM

GAS AND SNACK
2212 TENTH STREET
BAKER CITY.OR
5415236984

AUG 2. 2023 11:40 AM

SYSTEM STATUS REPORT

T 2:DELIVERY NEEDED

T 3:HIGH WATER WARNING

---- IN-TANK ALARM -----
T 3:DIESEL
HIGH PRODUCT ALARM
AUG 2. 2023 11:41 AM

---- IN-TANK ALARM -----
T 3:DIESEL
OVERFILL ALARM
AUG 2. 2023 11:42 AM

GAS AND SNACK
2212 TENTH STREET
BAKER CITY.OR
5415236984

AUG 2. 2023 11:42 AM

SYSTEM STATUS REPORT

T 2:DELIVERY NEEDED

T 3:OVERFILL ALARM

T 3:HIGH PRODUCT ALARM


Wayne
FUTURA
PM2
PetroClear
NON-ETHANOL
SANS ÉTHANOL
PuL

Wayne

PRESSURE STEP TEST
G.P.H. TEST
(1) CALIBRATE
DISPENSER NOZZLE
-CALIBRATION-
(3) CALIBRATE
(2) CALIBRATE
psi

Vaporless Manufacturing, Inc.
LDT-690 Leak Detector Tester
Installation & Operation Protocol
October 1st, 2008

Installing LDT-690

Check for Leaks

Pressure Test System

Leak Test: Phase 1: Calibrating a leak at 10 PSI

Bleed-back Test

Bleed-through Time

Leak Test: Phase 2: Does the leak detector search for and find a leak.

Explanation of Leak Search Pressure Ranges

Gallons to Milliliters Conversion Chart

Gallons Per Hour	ML Per Minute	ML Per 1/2 Minute
1	3.8	1.9
2	7.6	3.8
3	11.4	5.7
4	15.1	7.6
5	18.9	9.4
6	22.7	11.3
7	26.5	13.2
8	30.3	15.1
9	34.1	17.0
10	37.9	18.9
11	41.6	20.8
12	45.4	22.7
13	49.2	24.6
14	53.0	26.5
15	56.8	28.4
16	60.6	30.3
17	64.4	32.2
18	68.1	34.1
19	71.9	36.0
20	75.7	37.9
21	79.5	39.8
22	83.3	41.7
23	87.1	43.6
24	90.9	45.5
25	94.6	47.3
26	98.4	49.2
27	102.2	51.1
28	106.0	53.0
29	109.8	54.9
30	113.6	56.8
31	117.4	58.7
32	121.2	60.6
33	124.9	62.5
34	128.7	64.4
35	132.5	66.3
36	136.3	68.2
37	140.1	70.1
38	143.9	72.0
39	147.7	73.9
40	151.4	75.7
41	155.2	77.6
42	159.0	79.5
43	162.8	81.4
44	166.6	83.3
45	170.4	85.2
46	174.2	87.1
47	177.9	89.0
48	181.7	90.9
49	185.5	92.8
50	189.3	94.7
51	193.1	96.6
52	196.9	98.5
53	200.7	100.4
54	204.5	102.3
55	208.2	104.1
56	212.0	106.0
57	215.8	107.9
58	219.6	109.8
59	223.4	111.7
60	227.2	113.6

MODEL LDT-690AF/RF
LEAK DETECTOR TESTER
SERIAL NO: 15614
Vaporless Manufacturing, Inc.
WARNING: DO NOT DISASSEMBLE
FACTORY RECALIBRATION REQUIRED EVERY TWO YEARS

LDT-690 / LDT-690 AF FACTORY RECALIBRATION SERVICES
PERFORMED ON 7-23-24 BY W.E
TO ENSURE VALID TEST RESULTS, UNIT REQUIRES FACTORY RECALIBRATION EVERY TWO YEARS.

Pul

Wayne

PRESSURE STEP TEST

G.P.H. TEST

DISPENSER NOZZLE

-CALIBRATION-

Vaporless Manufacturing, Inc.

LDT 690 Leak Detector Tester

Installation Protocol

MODEL LDT-690AF/RF
LEAK DETECTOR TESTER
SERIAL NO: 19414

Vaporless

WARNING: DO NOT DISASSEMBLE

LDT-690 / LDT-690 LAE FACTORY RECALIBRATION SERVICES
PERFORMED ON 7-23-24 BY W.E

TO ENSURE VALID TEST RESULTS, UNIT REQUIRES FACTORY RECALIBRATION EVERY TWO YEARS.

Gallons to Milliliters Conversion Chart

Gallons Per Hour	Ml. Per Minute	Ml. Per 1/2 Minute
1	63	32
1 1/2	95	48
2	126	63
2 1/2	158	79
3	189	95
3 1/2	221	111
4	252	126
4 1/2	284	142
5	315	158
5 1/2	347	174
6	378	189
6 1/2	410	205
7	441	221
7 1/2	473	237
8	504	252
8 1/2	536	268
9	567	284
9 1/2	599	300
10	630	315
10 1/2	662	331
11	693	347
11 1/2	725	363
12	756	378
12 1/2	788	394
13	819	410
13 1/2	851	426
14	882	441
14 1/2	914	457
15	945	473
15 1/2	977	489
16	1008	504
16 1/2	1040	520
17	1071	536
17 1/2	1103	552
18	1134	567
18 1/2	1166	583
19	1197	599
19 1/2	1229	615
20	1260	630

PSL


Pul


1561

DSL

MODEL #99LD-2000
S/N 2301135 1


DoubleTrac
RELIEF VALVE
DISCHARGE
RELIEF VALVE
DISCHARGE


MODEL #99LD2000
2301135O
2nd


PISCES
by
OPW
Serial No
Part No

MODEL #99LD-2000
S/N 221217-04

1-2

Gilbarco®

AUG 2, 2023 3:37:30 PM
T 2:DELIVERY NEEDED

ALARM

WARNING

POWER

MODE

BACKUP

FUNC-TION

PRINT

CHANGE

STEP

PAPER FEED

ENTER

TANK SENSOR

QZ. 1

ABC 2

DEF 3

GHI 4

JKL 5

MNO 6

PRS 7

TUV 8

WXY 9

←
+/-

□-,
0

→
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EMC™

BASIC MONITORING CONSOLE

GAS AND SNACK
2212 TENTH STREET
BAKER CITY,OR
5415236984

AUG 2, 2023 3:37 PM

SYSTEM STATUS REPORT

T 2:DELIVERY NEEDED

GAS AND SNACK
2212 TENTH STREET
BAKER CITY,OR
5415236984

AUG 2, 2023 3:37 PM

INVENTORY REPORT

T 1:REGULAR
VOLUME = 5189 GALS
ULLAGE = 6811 GALS
90% ULLAGE= 5611 GALS
TC VOLUME = 5141 GALS
HEIGHT = 43.31 INCHES
WATER VOL = 0 GALS
WATER = 0.00 INCHES
TEMP = 73.1 DEG F

T 2:ULTIMA
VOLUME = 1822 GALS
ULLAGE = 8378 GALS
90% ULLAGE= 7358 GALS
TC VOLUME = 1812 GALS
HEIGHT = 21.84 INCHES
WATER VOL = 24 GALS
WATER = 1.06 INCHES
TEMP = 67.5 DEG F

T 3:DIESEL
VOLUME = 3515 GALS
ULLAGE = 4485 GALS
90% ULLAGE= 3685 GALS
TC VOLUME = 3499 GALS
HEIGHT = 42.87 INCHES
WATER VOL = 22 GALS
WATER = 1.21 INCHES
TEMP = 70.0 DEG F

* * * * * END * * * * *

GAS AND SNACK
2212 TENTH STREET
BAKER CITY,OR
5415236984

AUG 2, 2023 3:37 PM

LIQUID STATUS

AUG 2, 2023 3:37 PM

NONE

* * * * * END * * * * *

Gilbarco®

AUG 2, 2023 11:12:15 AM
T 2:DELIVERY NEEDED

ALARM

WARNING

POWER

PRINT

CHANGE

PAPER FEED

ENTER

TANK SENSOR

EMC™

BASIC MONITORING CONSOLE

From: UST Duty Officer * DEQ
To: marla fletchercstores.com
Cc: UST Duty Officer * DEQ; FOSS Diana * DEQ
Subject: Fletcher Inspections - 4091, 11826, 2019
Date: Friday, March 21, 2025 10:17:30 AM
Attachments: image001.png
image002.png
image003.png
image004.png
Inv_283072_from_Leonard_Petroleum_Equipment_of_Boise_LLC_27732.pdf
2024-FC-9618 (edited) issued to 18826.pdf
2025-FC-9798 issued to 2019.pdf
2024-FC-9608 issued to 4091.pdf

Howdy Marla –

It has been some time… Sorry to have been so delayed. The world keeps turning and work continues to pile up.

As things sit… I believe we have all corrective actions work completed at the Baker City locations. Besides penalties being received, DEQ has received completed corrective action documentation. Thank you.

Please see the attached document citations with reduced penalties.

4091 – Reduced penalty amounts.

11826 – Found '22 records and removed violations. Reduced penalty amounts.

2019 – Vale

After the inspection, I received all sorts of very useful information that addressed my concerns about the cathodic protection system repair, dispenser/containment sump installation, etc. Those violations have been removed from the attached citation and I appreciate your efforts in obtaining and providing me with that data.

There are two additional follow ups which are needed to complete the failed testing of equipment discovered in Feb2022. It appears testing was performed and repairs completed in April 2022 (invoice attached). Please submit post installation testing of the overfill and spill buckets and the repairs performed on the tank monitor in 2024 inspection that called out for failed indicators at the ATG.

Overfill - 25Feb2022 – Fuel System Testing co.

Overfill Prevention Inspection

Identify Tank (number, product type, etc);		1PuL	2RuLe10	3BioDSL	4DSL		
	Make and model	OPW71SO	OPW71SO	EMCA1100	EMCA1100		
Flapper Valve	Shuts off flow at 95% tank capacity	☑	☑	☐	☐	☐	☐
	Float moves freely, proper orientation, poppet moves into flow path and operates per mfg. design	☑	☑	☐	☐	☐	☐
	If present, bypass valve in the drop tube is open	☐	☐	☐	☐	☐	☐
	Inspection Results (P = pass, F = fail)	P	P	F	F	—	—

Spill bucket - 25Feb2022

Spill Bucket Testing (passes if water level drops less than 1/8 inch, minimum test time 1 hour)

☐ **Spill bucket is double-walled and monitored monthly (must be recorded on 30-day walkthrough inspection form)**

Identify tank (tank number, product type, etc.)	1PuL	2RuLe10	3BioDSL	4DSL		
Liquid and debris removed from spill bucket* * Liquid and debris must be disposed of properly	☑	☑	☑	☑	☐	☐
Water was filled 1.5 inches from top of spill bucket	☐	☐	☐	☑	☐	☐
Starting water level height (inches)	15" WC	15" WC	15" WC	9.5		
Starting test time	2:16	2:11	2:06	3:51		
Ending test time	2:17	2:12	2:07	4:28		
Ending water level height (inches)	15" WC	15" WC	15" WC	8		
Level change	0	0	0	-1.5"		
For vacuum testing, 30-inch water column was applied ~~and at least 26-inch water column was maintained after~~ 1 minutes or mfg. procedures	☑	☑	☑	☐	☐	☐
Test Results (P = pass, F = fail)	P	P	P	F	—	—

It appears that that failed spill bucket and overfill were replaced – please send the post installation inspection results to close this matter (refer to screenshot below)

	Net 30	JLR	4/13/2022			FLETCHERS S...	4/13/2022

Quantity	Description	Unit Price	Extended Price
	Diesel Spill Bucket and Bio-Diesel Flapper Valve Replacements		
1	OPW 1C-3112P Double Wall Spill Bucket	1,465.56	1,465.56T
2	OPW 61T-7368 Straight drop tube	661.93	1,323.86T
1	OPW 206122 4" Riser thread adapter long	146.00	146.00T
1	Black Pipe Riser Nipple 4" X 6"	45.00	45.00T
	Construction Labor and specialty tools include, Sawcut/Jackhammer/Concrete Removal, mobilize tow behind air compressor, jackhammer, hose and bits, to break out concrete, excavate and remove rebar. Install spill bucket, measure and field cut drop tube. Disposal of concrete and earthen materials from site. Backfill with pea gravel, pour back concrete. Mileage/Travel/Labor	3,480.97	3,480.97

There appears to have been a few LEDs that were not functional and the monitor was failed for. Did these get replaced? If so, please send those details

☑ All probes have been visually inspected for any damage, including kinks or breaks in the cable, floats move freely.

☑ ATG setup meets compliance standards for this site: (leak minimum volume and duration 0.2 gph, 0.1 gph, alarms enabled, etc.)

☑ All probe fuel and water float alarms and readings on ATG agree with corresponding measurement of the probe itself.

☑ Overfill Alarm activates at no more than 90% tank capacity.

☑ Overfill Alarm can be seen and heard by delivery driver .

☑ Overfill Alarm activates in test mode.

Test Results (P = Pass, F = Fail)							
	F	F	F	F	—	—	—

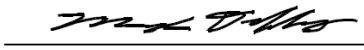
Corrections/Comments: List any issues that did not fit on page one

Description of actions taken if items tested or inspected were not acceptable

The probes and ATG console fail overall due to the power light on the console not functioning properly. The overfill alarm passed the testing. The probes are in good condition and work as they should. There are no sensors connected to or setup on the console.

Tester's Signature

Date: 13 August 2024



Page 3 of 3

Appreciate your help sorting these facilities out.

Have a nice day,

Dylan Eckert
Inspector, Underground Storage Tanks
DEQ - Eugene, Land Quality Division
165 E. 7th Ave Suite 100
Eugene, OR 97401-3049
C 541-215-2368

Sign-up for UST Program Updates:
https://service.govdelivery.com/accounts/ORDEQ/subscriber/new?topic_id=ORDEQ_546

The UST Program. 60-Minute story: https://www.youtube.com/watch?v=leYoLtsQ2WQ

Dylan Eckert
Inspector, Underground Storage Tanks

DEQ - Eugene, Land Quality Division
165 E. 7th Ave Suite 100
Eugene, OR 97401-3049
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The UST Program. 60-Minute story: https://www.youtube.com/watch?v=leYoLtsQ2WQ

From:	UST Duty Officer * DEQ
To:	marla fletchercstores.com
Subject:	RE: 4091- Gas & Snack Inspection Follow-up
Date:	Wednesday, October 9, 2024 11:17:00 AM
Attachments:	image001.png 2024-FC-9608 issued to 4091.pdf image002.png

---

Hello Marla,

I am following up on the inspection completed by Dylan Eckert on 8/30/24 for **facility 4091 Gas and Snack.**

Please review the attached field citation. The deadline for payment of the $1500 fine and corrective actions is 11/9/24.

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

From: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>
Sent: Wednesday, October 2, 2024 1:51 PM
To: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>; marla fletchercstores.com <marla@fletchercstores.com>
Cc: DROUIN Mark * DEQ <Mark.DROUIN@deq.oregon.gov>
Subject: 4091- Gas & Snack Inspection Follow-up

Good Day Marla -

Thank you for allowing me to inspect your facility. I appreciate your equipment investment / upgrade from the previous 2022 inspection which noted Tolkiem turbines with off-turbine leak detectors which was corrected in 2023.

Please direct your responses to ust.dutyofficer@deq.oregon.gov

There were some paperwork issues that need to be submitted. Please submit these documents by this Friday the 4rd of October 2024. They will be reviewed and any “violations” noted below will be removed for a final evaluation.

Dispenser ½ - needs to be cleaned out.

Given the volume is well below any penetrations, I don't think it is necessary to perform an integrity test… unless the volume has increased from the photograph above….. this is presumably from filter replacement drips and maybe some nozzle leakage.

Please submit photographs from all dispenser sumps within 7 days to confirm they are all clean and dry.

This email has two intended recipients: you (permittee) and our enforcement/follow-up team. Because of this split audience, there might be some jargon used which is for DEQ internal purposes. I'll be asking for paperwork/documentation by a specific time and will state the violation/corrective action if the work is not submitted or was not performed. Please note the deadline for submissions…. After that deadline has passed, the inspection is closed for additional information and a determination will be assessed given the available information. By not submitting the requested documents, you might be assessed citations for items which were completed but DEQ simply does not have evidence for.

This team will work with me on documents you submit or corrective actions completed to ensure the work is sufficient to close the inspection.

Violation

1 – Failure to test spill prevention equipment at least every 3 years. (C1e)
2 – Failure to perform testing of spill and overfill prevention equipment prior to 01oct2020. (C1f)
3 - Failure to test overfill prevention equipment at least every 3 years after initial test. (C2c)
4 – Failure to perform compliance testing in 2022 – lines, leak detectors, release detection

equipment. (H2.7, H2.9, G5)
5 – Failure to provide Oregon recognized Class A/B operator training. (A5a)

Corrective Action.

1. Submit all testing documents regarding the testing of spill prevention and overfill prevention equipment prior to 04 Oct 2024. Equipment must be inspected/tested prior to 20 Oct 2024 if currently out of compliance.
2. Same as 1.
3. Same as 1.
4. Testing of lines and leak detectors and monitor completed on 03 Aug 2023 and 13 Aug 2024. No additional testing requested.
5. Submit Class A/B operator training that is Oregon recognized prior to 20 Oct 2024. https://www.oregon.gov/deq/tanks/pages/ust-training.aspx

I appreciate your cooperation working with DEQ to maintain your system in compliance with the UST Compliance Rules.

Dylan Eckert
Inspector, Underground Storage Tanks
DEQ - Eugene, Land Quality Division
165 E. 7th Ave Suite 100
Eugene, OR 97401-3049
C 541-215-2368

Sign-up for UST Program Updates:
https://service.govdelivery.com/accounts/ORDEQ/subscriber/new?topic_id=ORDEQ_546

The UST Program. 60-Minute story: https://www.youtube.com/watch?v=leYoLtsQ2WQ

Dylan Eckert
Inspector, Underground Storage Tanks
DEQ - Eugene, Land Quality Division

165 E. 7th Ave Suite 100
Eugene, OR 97401-3049
C 541-215-2368

Sign-up for UST Program Updates:
https://service.govdelivery.com/accounts/ORDEQ/subscriber/new?topic_id=ORDEQ_546

The UST Program. 60-Minute story: https://www.youtube.com/watch?v=leYoLtsQ2WQ

$ 1,100.00 — $ 1,100.00 = $ 0.00

Penalty

2024-FC-9608

UST - Field Citation

$ 1,100.00

1 Results

Add Penalty | Send to FIMS

Payment

Check by Mail 112112-3

4/22/2025

47494

$ 1,100.00

Type: Check by Mail

Amount: 1100

E-Payment Confirmation#:

E-Payment Settle Date: mm/dd/yyyy

Ref#: 47494

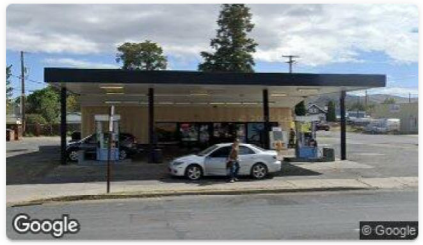
Payment Date: 04/22/2025

Comments: 2024-FC-9608

(Remaining Length: 3988)

Site Info

GAS AND SNACK



2212 10TH ST, BAKER CITY, OR 97814

82472

293520

CEM_FacilityIdentifier=20746 UST (4091)

Stationary

Contact Info

Marla Gardner

Fletcher Petroleum

208-377-0024

Inspection Info