



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Headquarters Office

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

TTY 711

July 24, 2025

Marti Sharp
NEXGEN Products Company LLC
2301 NW Thurman St #G
Portland, OR. 97210

RE: UST Compliance Inspection
DEQ UST # 11388 & 7127
WECO Springfield & Junction City

Marti Sharp,

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

If I do not hear from you, the inspection for this facility is scheduled for August 12, 2025, starting at approximately 8:00 am. We will start at the Springfield site, 1616 N 30th St, and then move to Junction City. Please note that the inspection will require uninterrupted participation and attendance by you or a knowledgeable assistant. For the inspection you need to provide access to tank sumps, under dispenser areas, cathodic protection rectifiers, and leak monitoring equipment. DEQ will not touch the equipment or enter the facility, if you are unable to assist with equipment access, please have your UST Service Provider there. This inspection may also include review of Stage I Vapor Recovery.

To complete this inspection, you will need to have compliance testing records available on-site on the day of the inspection or sent to me prior to the inspection at diana.foss@deq.oregon.gov. If the records are not available before or during the inspection, the facility will be subject to enforcement actions.

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

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

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

If violations are found at the time of the inspection without prior notification, DEQ is required to initiate enforcement action. For UST violations, enforcement usually begins with a field citation option, which is much like paying a traffic ticket and making corrections.

Some enforcement situations including repeat violations will go through a longer and more formal process including civil penalties.

Thank you for your cooperation. I can be reached at 503-869.0770 or diana.foss@deq.oregon.gov to answer any questions you may have and assist you in the preparation for your inspection.

Sincerely,

Diana Foss

Diana Foss
Senior Policy Analyst
UST Compliance

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

Inspector: Foss Date: 8/12/25 Time: 8am Facility: 11388

I. Site Information					
Facility Name: <u>WECO Springfield</u>		Permittee: <u>NEXGEN Products CO</u>		Contact: <u>Manti'</u>	
Site Address: <u>1616 N 30th St</u>		Organization: <u>Manti' Sharp</u>		Phone:	
City: <u>Springfield</u>		Phone: <u>503 471 4305</u>			
II. Tank Information					
DEQ Permit #	<u>BDKC5</u>	<u>BDKDK</u>	<u>BHFJK</u>		
Estimated Gallons	<u>12k</u>	<u>12k</u>	<u>20k</u>		
Substance	<u>gas</u>	<u>gas</u>	<u>diesel</u>		
Tank Material	<u>FRP</u>	<u>→</u>	<u>FRP</u>		
Tank Install Date	<u>6/27/94</u>	<u>→</u>	<u>2/3/2020</u>		
Pipe Material	<u>Environflex</u>	<u>→</u>			
Pipe Type	<u>pressure</u>	<u>→</u>			
Pipe Install Date			<u>2/3/2020</u>		
Overfill Device	<u>flapper</u>	<u>→</u>	<u>Alarm</u>		
Notes and Comments from the UST database: <u>get new tank LD info</u> <u>spill testing 8/10/2020</u> <u>overfill pump in 2020</u> ↑ <u>2 turbines on diesel</u> ☐ Check file before conducting inspection					
If tanks are manifolded, which tanks:					
III. Operating Certificate			Compliance		
☒ Current ☒ Accurate ☐ Posted for delivery drive to observe			☒ Yes ☐ No		
IV. Operator Training			Compliance		
Class A/B Operator ☒ Yes ☐ No Name: <u>Manti' Sharp</u> Date: <u>2014</u>			☒ Yes ☐ No		
Class C Operator ☐ Yes ☐ No ☒ Cardlock					
V. Financial Responsibility			Compliance		
Type of coverage: <u>insurance</u> Begin Date: <u>10/1/24</u> End Date: <u>10/1/25</u>					
Coverage amount correct: <u>yes</u> Number of tanks covered: <u>3</u>					
Financial responsibility could also be in the form of self insurance, bonds, local government, trust fund, and or guarantee					
VI. Walkthrough Requirements			Compliance		
Spill prevention and release detection equipment checked monthly?			☒ Yes ☐ No		
Tank top sumps checked annually?			☒ Yes ☐ No		

VII. Release Detection

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

Date of last testing:

5/15/25

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:

5/15/25

Last three tests available?

☒ Yes

☐ No

Number of lines tested:

3

Number of LD tested:

4

Leak detector manufacturer make and model:

Tank gauge manufacturer make and model:

MLLD on turbine manifold?

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

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

☐ Yes

☐ No

☐ Yes

☐ No

☐ 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 25 24

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: _____		Date: _____		Time: _____		Facility: _____	
VIII. Spill Prevention				Compliance		☒ Yes ☐ No	
Date(s) of testing: <u>8/10/20</u> <u>6/9/23 - failed</u>		Number of spill buckets tested? _____					
Did spill bucket pass most recent testing? ☐ Yes ☐ No		If no, was spill bucket replaced/repared? ☐ Yes ☐ No					
During inspection, visual damage to spill bucket? ☐ Yes ☐ No		<u>9/26/23 passed</u>					
☐ Hydrostatic testing (test takes one hour to complete) ☐ Vacuum test (test takes 1 minute, ending vacuum must be 26 inches water column or greater)							
IX. Overfill Prevention				Compliance		☒ Yes ☐ No	
Date(s) of testing: <u>5/15/25</u> <u>5/30/24</u>							
Overfill device pass most recent testing? ☐ Yes ☐ No		If no, overfill device replaced? ☐ Yes ☐ No					
Overfill method that was tested: ☐ Alarm ☐ Flapper ☐ Ball Float							
<u>Overfill Alarm</u>							
Alarm sounds when tank is 90% full		☐ Yes ☐ No					
Driver can see or hear alarm at point of transfer?		☐ Yes ☐ No					
Sound alarm from tank gauge during inspection?		☐ Yes ☐ No					
<u>Flapper Valve</u>							
Testing verified the valve automatically restricts flow at 95%		☐ Yes ☐ No					
Visual observation of flapper on day of inspection?		☐ Yes ☐ No					
<u>Ball Float</u>							
Testing verified the ball float automatically restricts flow at 90%		☐ Yes ☐ No					
Visual observation of ball float during inspection?		☐ Yes ☐ No					
X. Corrosion Protection				Compliance		☒ Yes ☐ No	
☐ Cathodic ☐ Galvanic ☐ Impressed Current							
Steel tank with cathodic?		☐ Yes ☐ No					
Steel pipes with cathodic?		☐ Yes ☐ No					
Steel flex-lines with cathodic?		☐ Yes ☐ No					
Date of cathodic test: _____		☐ Yes ☐ No					
Last two tests available?		☐ Yes ☐ No					
Did last test pass?		☐ Yes ☐ No					
If not:		☐ Yes ☐ No					
Was failed test reported to DEQ?		☐ Yes ☐ No					
Was system repaired?		☐ Yes ☐ No					
Date of repair? _____		☐ Yes ☐ No					
Cathodic retested within 6 mos. of repair?		☐ Yes ☐ No					
Date of retesting? _____		☐ Yes ☐ No					
If impressed current system:		☐ Yes ☐ No					
Rectifier Operational?		☐ Yes ☐ No					
Rectifier log maintained?		☐ Yes ☐ No					
Rectifier been operating continuously		☐ Yes ☐ No					
☐ Tank Lining							
Date of last test? _____		☐ Yes ☐ No					
Pressure test conducted after tank lining inspection?		☐ Yes ☐ No					

XI. General notes from inspection

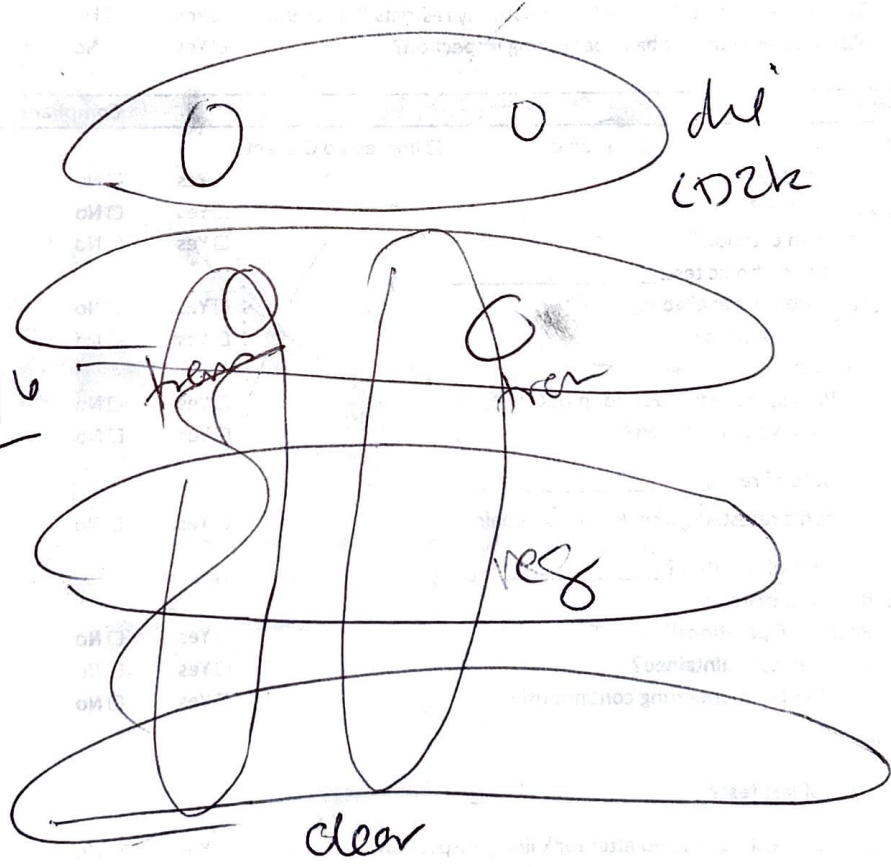
Representative onsite: _____ email: _____

1
a 10

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7/8

1/2 3/4



Compliance Determination:

☐ No Violations Observed

☐ Observed violations resulting in enforcement

Inspector Signature: _____

Date: _____

Inspection Survey

Submitted by: diana.foss_deq

Submitted time: Aug 13, 2025, 12:29:15 PM

Date

Aug 12, 2025

Time

08:03

UST Facility ID

11,388

Inspector

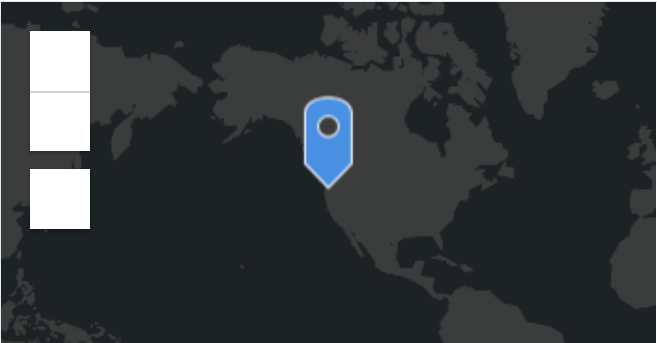
Foss

Type of Inspection

Full Compliance

Location

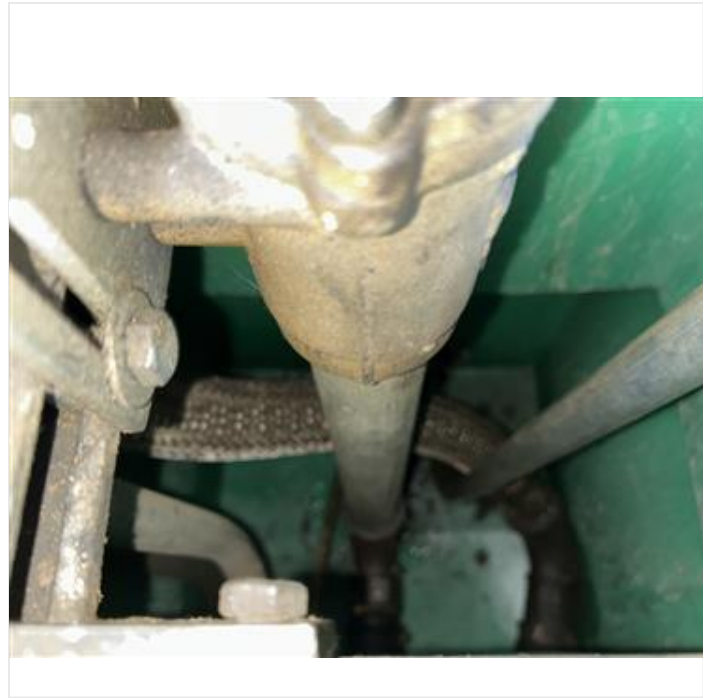
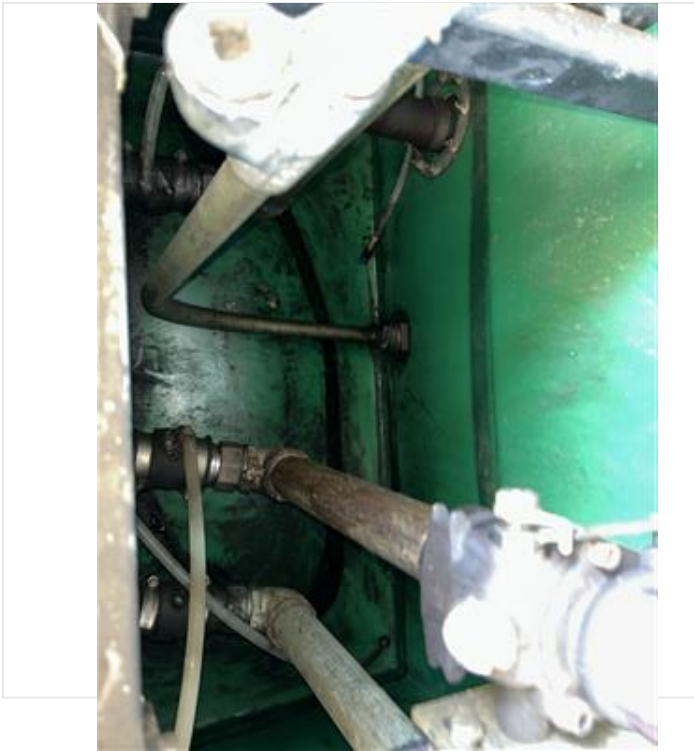
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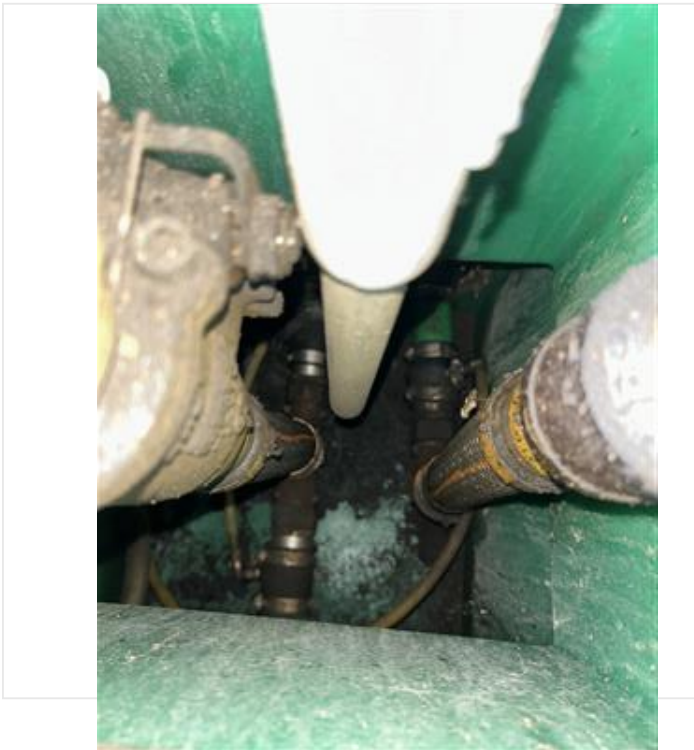
Esri, FAO, NOAA, USGS

Powered by Esri

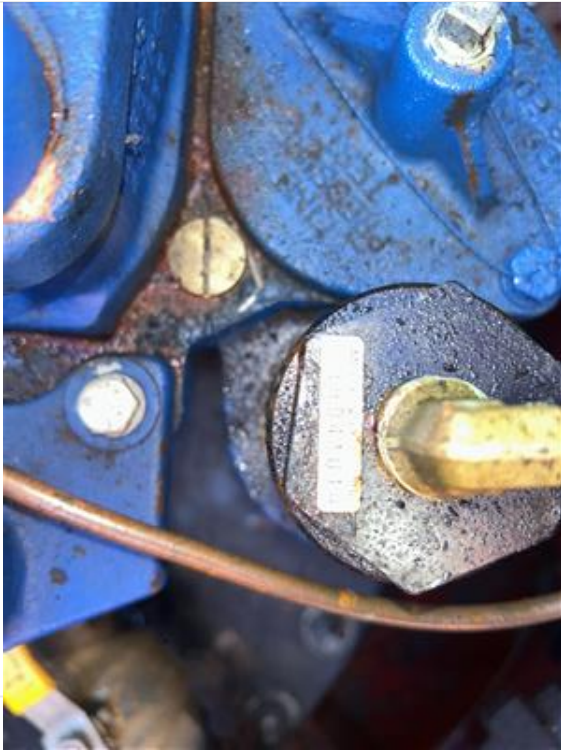
Photograph



photos-20250812-153557main9.jpg



photos-20250812-152828olddie.jpg





photos-20250812-150632.jpg



photos-20250812-1557221-2disp.jpg





photos-20250812-155836.jpg



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

August 13, 2025

Marti Sharp
NEXGEN Products Company LLC
2301 NW Thurman St Ste G
Portland, OR 97210

RE: UST Compliance Determination
DEQ UST # 11388
WECO Springfield

Marti Sharp:

The Oregon Department of Environmental Quality (DEQ) finalized the underground storage tank (UST) full compliance inspection that was conducted at the facility listed above on August 12, 2025. The purpose of this letter is to inform you of the results of this inspection. Based on the records available and site conditions, the DEQ inspector did not observe any violations with applicable State of Oregon UST rules on this day.

During an inspection, DEQ attempts to conduct a thorough review of the UST system. Nonetheless, you, as the permittee and owner, remain responsible for complying with all applicable UST rules. Therefore, if a violation is observed during a subsequent inspection, the facility will be cited for this violation and may be subject to civil penalties.

The DEQ appreciates your efforts to operate and maintain your UST system in compliance with Oregon environmental law. This facility is subject to future inspections. Please remember to conduct service and maintenance inspections and periodic testing at the required intervals and to implement and/or maintain adequate record keeping. Some general recommendations for maintaining UST compliance are listed below.

- Monitor tanks and piping for leaks and keep twelve months of monthly and or daily records as necessary for your specific systems. **Notify the DEQ any leak test results indicating the possibility of a release (i.e., test failure) within 24 hours as a suspected release (OAR 340-150-0500) and immediately begin investigation under OAR 340-150-0510.**
- Maintain financial responsibility coverage for pollution liability.
- Keep spill prevention devices emptied and clean – particularly just before fuel deliveries.
- Schedule and complete UST system corrosion protection testing on the required 3 year schedule, if necessary.
- Monitor fuel delivery records for signs of overfilling to capacity and make corrections to defective overfill prevention equipment or improper delivery procedures as necessary.

- Be aware of any suspected release condition and keep an alarm log to record any such conditions. Suspected release conditions include failed tank or piping leak tests, fuel or liquid sensor alarms, fuel is found in secondary containments or when liquid of any kind (dry or vacuum systems) is found in a tank interstitial space. Such conditions must be reported to the DEQ within 24 hours and an investigation into the cause must be conducted.
- Contact your service provider for assistance with testing and alarm investigation.
- Contact your service provider and begin an investigation if you suspect fuel loss, equipment is malfunctioning, leak detectors are triggering, or product lines are losing prime.
- Report a confirmed release to the DEQ within 24 hours of confirming product loss into the subsurface in any amount.

Please contact me if you have any questions about this matter at 503-869-0770 or diana.foss@deq.oregon.gov.

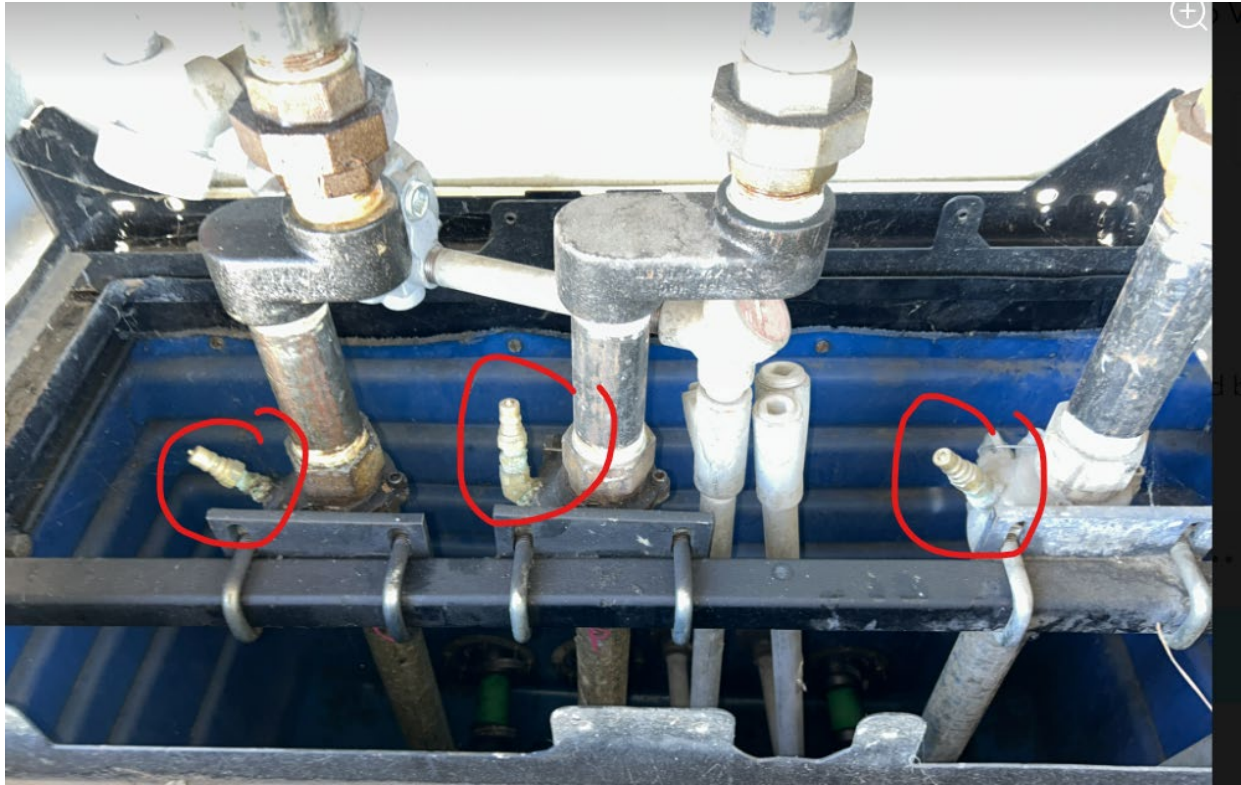
Diana Foss

Diana Foss
Senior Policy Analyst
Underground Storage Tank Program

From: FOSS Diana * DEQ
To: "Marti Sharp"
Cc: Frank Taubenkrau
Subject: RE: UST Full Compliance Inspections 8/12/25 Documents
Date: Wednesday, August 13, 2025 1:12:10 PM
Attachments: [image001.png](#)
[InspDetermination_Facility_11388_08122025.pdf](#)
[image002.png](#)

Thanks so much! That makes a passing inspection for Springfield! Attached is the compliance determination letter.

I pointed out to Frank that PCS is leaving test ports on your shear valves in the dispensers:



I didn't cite this, but you definitely want to ask Luke or Ken to come out and remove them, since they make your shear valves non-functional.

Thanks!



Diana Foss (she/her)
Senior Policy Analyst, Underground Storage Tanks
DEQ Headquarters, Land Quality Division
700 NE Multnomah Street, Suite 600
Portland OR 97232-4100
C 503-869-0770

From: Marti Sharp <marti.sharp@carsonteam.com>
Sent: Wednesday, August 13, 2025 12:55 PM
To: FOSS Diana * DEQ <Diana.FOSS@deq.oregon.gov>
Cc: Frank Taubenkrau <frank.taubenkrau@carsonteam.com>
Subject: RE: UST Full Compliance Inspections 8/12/25 Documents

Attached is the passing Sept 2023 spill bucket testing for Springfield as well as the 2024 AC

Carson



Marti Sharp

General Counsel

D: [503.471.4305](tel:503.471.4305) | T: [800.998.7767](tel:800.998.7767)



From: FOSS Diana * DEQ <Diana.FOSS@deq.oregon.gov>

Sent: Wednesday, August 13, 2025 12:23 PM

To: Marti Sharp <marti.sharp@carsonteam.com>

Cc: Frank Taubenkrau <frank.taubenkrau@carsonteam.com>

Subject: RE: UST Full Compliance Inspections 8/12/25 Documents

So we got the containment sump figured out for springfield, but I don't have a re-test of the failed spill bucket from 6/9/23, and I don't have your 2024 annual testing for Springfield, either.

Please get that to me by the end of the day today.

Thanks,



Diana Foss (she/her)

Senior Policy Analyst, Underground Storage Tanks

DEQ Headquarters, Land Quality Division

700 NE Multnomah Street, Suite 600

Portland OR 97232-4100

C 503-869-0770

From: FOSS Diana * DEQ <Diana.FOSS@deq.oregon.gov>

Sent: Thursday, August 7, 2025 2:56 PM

To: 'Marti Sharp' <marti.sharp@carsonteam.com>

Subject: RE: UST Full Compliance Inspections 8/12/25 Documents

Thanks for all of that!

- The 2023 spill bucket test failed for springfield. Did you fix the problem and retest?
- Still not seeing containment sump testing for the diesel tank and transition sump
- Not seeing 2024 annual testing for springfield

I haven't had a chance to go through Junction city yet. I'll do that first thing tomorrow.



Diana Foss (she/her)

Senior Policy Analyst, Underground Storage Tanks

DEQ Headquarters, Land Quality Division

700 NE Multnomah Street, Suite 600

Portland OR 97232-4100

C 503-869-0770

From: Marti Sharp <marti.sharp@carsonteam.com>

Sent: Thursday, August 7, 2025 1:53 PM

To: FOSS Diana * DEQ <Diana.FOSS@deq.oregon.gov>

Cc: Frank Taubenkrau <frank.taubenkrau@carsonteam.com>

Subject: RE: UST Full Compliance Inspections 8/12/25 Documents

Carson



Marti Sharp

General Counsel

D: [503.471.4305](tel:503.471.4305) | T: [800.998.7767](tel:800.998.7767)



From: FOSS Diana * DEQ <Diana.FOSS@deq.oregon.gov>

Sent: Thursday, August 7, 2025 1:28 PM

To: Marti Sharp <marti.sharp@carsonteam.com>

Cc: Frank Taubenkrau <frank.taubenkrau@carsonteam.com>

Subject: RE: UST Full Compliance Inspections 8/12/25 Documents

Thanks again. These are great, but I am not seeing the following reports:

- Spill buckets from 2023 (3 years after the first test you did on 8/10/2020)
- Overfill test from 2023 (3 years after the first test you did on 8/10/2020)
- Containment sump testing for the diesel tank for any year (need 2020, 2023)
- Annual line testing for the gas tanks and leak detector testing for all tanks from 2021 – 2024

I'll also need to see A/B & C operator training as well as the op cert and the monthly walkthroughs when I'm on site.



Diana Foss (she/her)

Senior Policy Analyst, Underground Storage Tanks

DEQ Headquarters, Land Quality Division

700 NE Multnomah Street, Suite 600

Portland OR 97232-4100

C 503-869-0770

From: Marti Sharp <marti.sharp@carsonteam.com>

Sent: Wednesday, August 6, 2025 1:46 PM

To: FOSS Diana * DEQ <Diana.FOSS@deq.oregon.gov>

Cc: Frank Taubenkrau <frank.taubenkrau@carsonteam.com>

Subject: RE: UST Full Compliance Inspections 8/12/25 Documents

Attached are documents in anticipation of the inspection on the 12th beginning at 8 a.m. in Springfield.

See you then!

Carson



Marti Sharp

General Counsel

D: [503.471.4305](tel:503.471.4305) | T: [800.998.7767](tel:800.998.7767)



From: FOSS Diana * DEQ <Diana.FOSS@deq.oregon.gov>

Sent: Friday, July 25, 2025 12:33 PM

To: Marti Sharp <marti.sharp@carsonteam.com>

Subject: RE: UST Full Compliance Inspections 8/12/25 Springfield & Junction City

Thank you!

How about we start in Springfield and then go to Junction City?



Diana Foss (she/her)

Senior Policy Analyst, Underground Storage Tanks
DEQ Headquarters, Land Quality Division
700 NE Multnomah Street, Suite 600
Portland OR 97232-4100
C 503-869-0770

From: Marti Sharp <marti.sharp@carsonteam.com>

Sent: Friday, July 25, 2025 12:04 PM

To: FOSS Diana * DEQ <Diana.FOSS@deq.oregon.gov>

Subject: RE: UST Full Compliance Inspections 8/12/25 Springfield & Junction City

That works for us Diana! Which site do you want to begin with at 8 a.m.?

I will send you compliance documents in advance of the inspection.

Thank you!

Carson



Marti Sharp

General Counsel

D: [503.471.4305](tel:503.471.4305) | T: [800.998.7767](tel:800.998.7767)



From: FOSS Diana * DEQ <Diana.FOSS@deq.oregon.gov>

Sent: Thursday, July 24, 2025 3:07 PM

To: Marti Sharp <marti.sharp@carsonteam.com>

Subject: UST Full Compliance Inspections 8/12/25 Springfield & Junction City

Hi, Marti,

I've planned to inspect two of your WECO sites, in Junction City and Springfield, on Tuesday August 12, starting at 8 am. Attached is an inspection notification letter. Please let me know if this time doesn't work for you.

Many thanks!



Diana Foss (she/her)

Senior Policy Analyst, Underground Storage Tanks
DEQ Headquarters, Land Quality Division
700 NE Multnomah Street, Suite 600
Portland OR 97232-4100
C 503-869-0770