



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

July 9, 2025

Lutfi Thabet
Buy2 026
1700 Valley River Dr Ste 400
Eugene, OR 97401

RE: UST Compliance Inspection
DEQ UST #4440
Buy2 026, Roseburg

Attention Lutfi Thabet,

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.

The inspection for this facility is scheduled for July 17, 2025, starting at approximately 300 PM. 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 monitor, 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.

Please read this entire notice and contact me with any questions about the upcoming inspection.

DEQ requests the following documentation be submitted electronically prior to the inspection. If this is not possible you will need to have compliance testing records available on-site on the day of the inspection. If the records are not available during the day of the inspection, you will have one (1) business day to provide the records to me electronically. After which time this facility will be subject to enforcement actions.

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

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

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

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

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

Thank you for your cooperation. I can be reached at 503-360-4287 or dave.pardue@deq.oregon.gov to answer any questions you may have and assist you in the preparation for your inspection.

Sincerely,

Dave Pardue

Dave Pardue
UST Program Coordinator
503-360-4287

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

Inspector: Dave Pardue

Date: 7/17/2025

3:00 PM

Facility: 4440

I. Site Information

Facility Name:	Buy2 026	Permittee:	Lutfi Thabet	Contact	Alex
Site Address:	4446 Old Hwy 99S	Organizati	Thabet Mgmt- Ali	Phone	541-968-9506
City:	Roseburg	Phone:	541-914-1026		

II. Tank Information

DEQ Permit #	BDCHE	1A	BDCHF	2A	BDCHG	3A	BDCHH	4A	BEAAH	5
Estimated Gallons	8000	Reg	8000	Reg	4000		4000		8000	prem
Substance	GAS		GAS		DIESEL		DIESEL		GAS	
Tank Material	SW STEEL	STI-P3	SW STEEL	STI-P3	SW STEEL	STI-P3	SW STEEL	STI-P3	COMPOSITE	
Tank Install Date	1990		1990		1990		1990		1997	
Pipe Material	DW-flex		DW-flex		DW-flex		DW-flex		DW-flex	
Pipe Type	press		press		press		PRESS		PRESS	
Pipe Install Date										
Overfill Device	alarm		alarm		alarm		alarm		ALARM	

☐ Check file before conducting inspection

Notes and Comments from the UST database:

2020- METAL LIDS BROKEN HANDLES. REGULAR AND DIESEL TANKS ARE SYPHON MANIFOLDED.
LINE TIGHTNESS TESTING PRIMARY LEAK DETECTION, PVVS, NO DROP TUBES- QUICK CONNECT IN UDCs?
last CP test noted - in 2020 fci- was 2018.

photo 574-604

If tanks are manifolded, which tanks:

Compliance

☒ Yes ☐ No

III. Operating Certificate

☒ Current

☒ Accurate

☒ Posted for delivery drive to observe

Compliance

☒ Yes ☐ No

IV. Operator Training

Class A/B Operator

☒ Yes

☐ No

Name:

Steven De Hart

Date:

7/9/24

Class C Operator

☒ Yes

☐ No

☐ Cardlock

Compliance

☒ Yes ☐ No

V. Financial Responsibility

Type of coverage:

Begin Date:

End Date:

Coverage amount correct:

Number of tanks covered:

Financial responsibility could also be in the form of self insurance, bonds, local government, trust fund, and or guarantee

Compliance

☐ Yes ☒ No

VI. Walkthrough Requirements

Spill prevention and release detection equipment checked monthly?

incorrect form used

☐ Yes ☒ No

Tank top sumps checked annually?

☐ Yes ☐ No

Release Detection

Compliance

☒ Yes ☐ No

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

~~Last 2 2023 failed~~

Date of last testing:

6/18/24

~~2024 and 2023~~

Last three tests available?

Yes

☐ No

b) Piping Release Detection (Check all that apply)

LINE TIGHTNESS TESTING

☒ Pressurized Piping

Mechanical Leak Detector (MLLD)

☒ Electronic Leak Detector (ELLD) - check for swiftcheck requirement

Date of last testing:

6-18-24

Last three tests available?

X Yes

☐ No

Number of lines tested:

3

Number of LD tested:

3

3

Leak detector manufacturer make and model:

VR auto LLD

99-LD-2000/Red jacket

Tank gauge manufacturer make and model:

HB TCS-350 INCON

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?

Diesels + Reg

☒ 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

12 MONTHS SENT

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: Dave Pardue

Date: 7/17/2025

Time: 3PM

Facility: 4440

11796

VIII. Spill Prevention

Compliance

☐ Yes☐ No

Date(s) of testing: 6/22/23

Number of spill buckets tested? 5

Did spill bucket pass most recent testing? Yes

☒ NoIf no, was spill bucket replaced/repared? ☒ Yes☐ No

During inspection, visual damage to spill bucket?

☐ Yes☐ No

2 failed. Replaced? Retested?

but - records - retest?

☐ 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:

Overfill device pass most recent testing? ☐ Yes☐ No

If no, overfill device replaced?

☐ Yes☐ No

Overfill method that was tested:

☒ Alarm☐ Flapper☐ Ball Float

Overfill Alarm

Alarm sounds when tank is 90% full

☒ Yes☐ No

Driver can see or hear alarm at point of transfer?

☒ Yes☐ No

Sound alarm from tank gauge during inspection?

☒ Yes☐ No

Flapper Valve

Testing verified the valve automatically restricts flow at 95%

☐ Yes☐ No

Visual observation of flapper on day of inspection?

☐ Yes☐ No

Ball Float

Testing verified the ball float automatically restricts flow at 90%

☐ Yes☐ No

Visual observation of ball float during inspection?

☐ Yes☐ No

X. Corrosion Protection

Compliance

☒ Yes☐ No☐ Cathodic☒ Galvanic

Impressed Current

Steel tank with cathodic?

☒ Yes☐ No

Steel pipes with cathodic?

☐ Yes☐ No

Steel flex-lines with cathodic?

☐ Yes☐ No

Date of cathodic test: 4/25/2025

Last two tests available?

☒ Yes

No

Did last test pass?

☒ Yes☐ No

If not:

Was failed test reported to DEQ?

☐ Yes☐ No

Was system repaired?

☐ Yes☐ No

Date of repair? _____

Cathodic retested within 6 mos. of repair?

☐ Yes☐ No

Date of retesting? _____

If impressed current system:

Rectifier Operational?

☐ Yes☐ No

Rectifier log maintained?

☐ Yes☐ No

Rectifier been operating continuously

☐ Yes☐ No☐ Tank Lining

Date of last test? _____

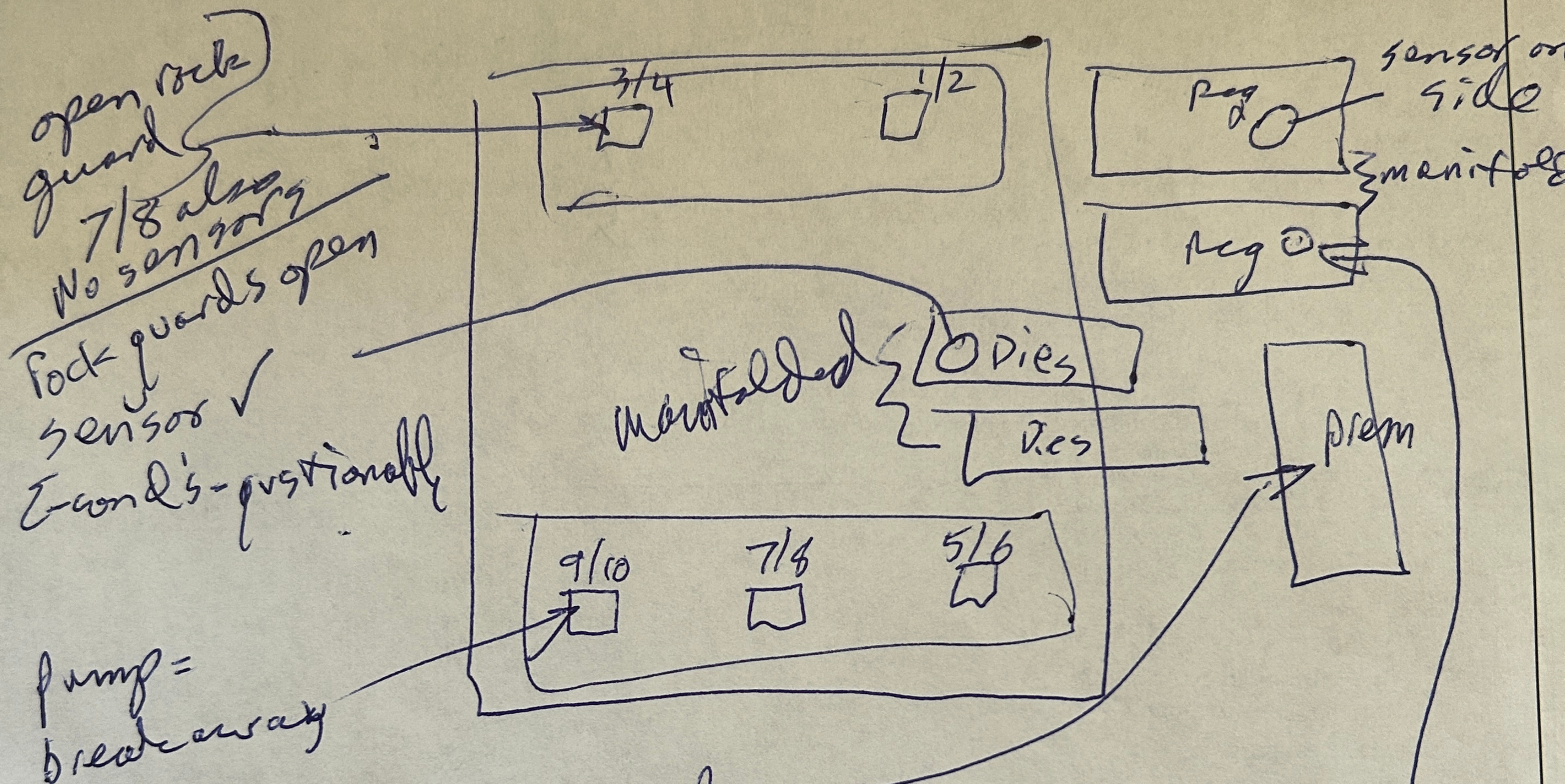
Pressure test conducted after tank lining inspection?

☐ Yes☐ No

Representative onsite: Alex Goucher

email: maintenance@tmi-fuel.com

old 995



OK → Line Tightness → sensor lifted
rock guards - No boots
C-con pens - bad

2 rock guards
are open to sun, p
1 c. conduit is not
sealed.

OK - LIT. $\rightarrow$ sensor lifted

Compliance Determination:

☐ No Violations Observed

~~10~~ Observed violations resulting in enforcement

Inspector Signature: _____

Date:

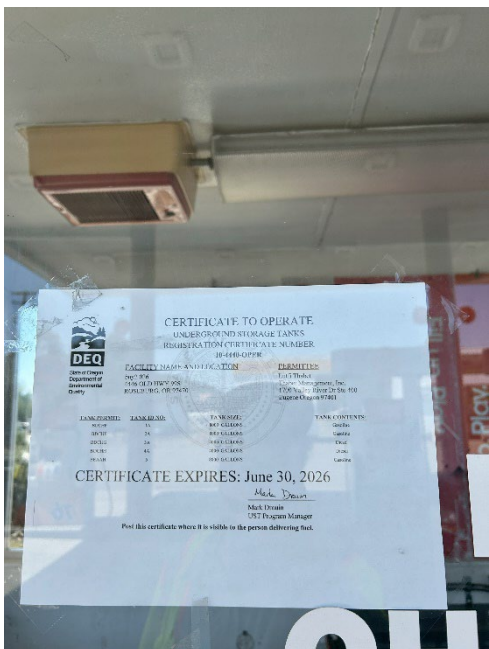
7/17/2025



1: Service Island



2: Vent Stacks



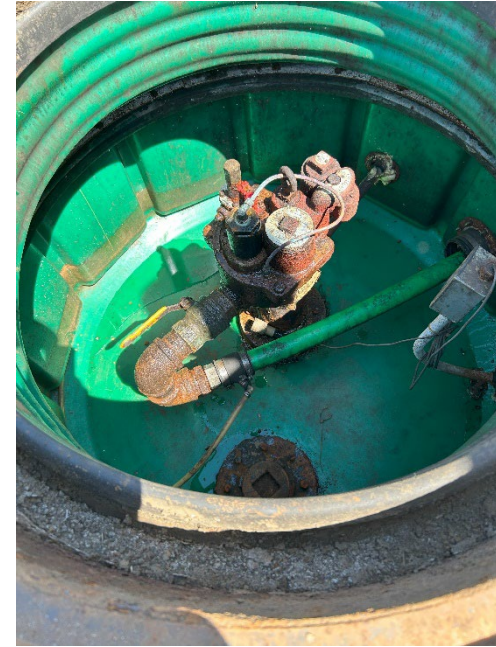
3: Operating Certificate



4: Diesel Manifold Sump



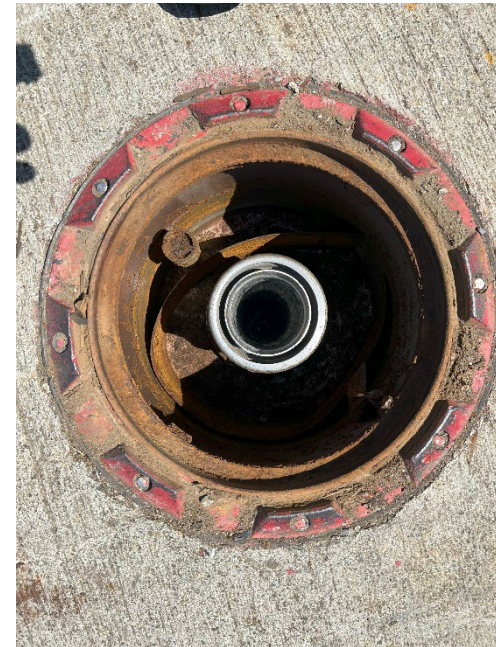
5: Regular Sump



6: Premium Sump



7: Diesel Fill



8: Regular Fill



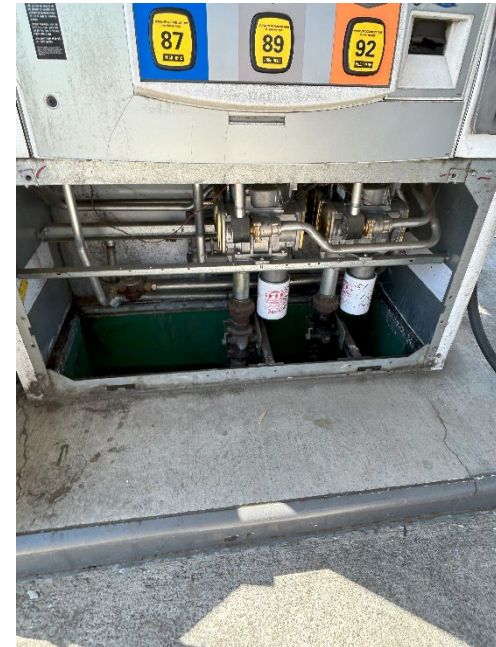
9: Dispenser 1/2



10:



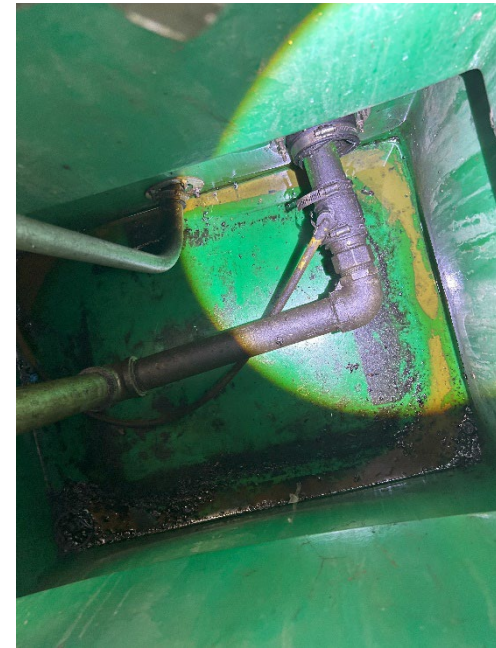
11: UDC Below 1/2



12: UDC Below 3/4



13: UDC below 9/10



14: UDC below 5/6



View of Overfill Alarm



State of Oregon
Department of
Environmental
Quality

Program Enforcement No. 2025-FC-9968

This section for
DEQ use only

Department of Environmental Quality
Underground Storage Tank Program

Field Citation
For UST Violations

Page 1 of 3

DEQ Information		UST Facility Information	
Inspection Date:	07/17/2025	Facility ID#:	4440
Inspector:	Dave Pardue	Facility Name:	buy2 026
DEQ Office:	700 NE Multnomah St	Facility Address:	4446 OLD HWY 99S, ROSEBURG, Oregon 97470
Phone #:		County:	Douglas

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: 08/15/2025
Facility Representative Present During Inspection:	☐ Permittee ☐ Owner ☐ Other			
Name of Permittee or Owner:	Thabet Management, Inc.			
Mailing Address:	1700 Valley River Dr Ste 400 , Eugene Oregon 97401			
Field Citation Penalty – See Page 3 for detailed listing of each violation.				\$ 300

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

Or pay online through your YDO account

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

Owner or Permittee should select Option 1 or Option 2 below and return a signed copy of this for to DEQ by the following date:

09/15/2025

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

Check one option

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

Name:	Owner / Permittee
Signature:	Date:

Important

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

Field Citation Requirements

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

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

Option 1:

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

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

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

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

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

Option 2:

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

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

DATE ISSUED: 08/15/2025

PROGRAM ENFORCEMENT No.: 2025-FC-9968

FACILITY ID: 4440

Page 3 of 3

Violation #1: **Failure to repair or replace spill prevention device that is not properly maintained, is defective, is damaged or may have been tampered with in a manner that prevents proper operation.**
***TCR:**

Corrective Action: Send spill bucket repair/replacement/retesting documentation to DEQ by September 01, 2025.

Rule Citation: OAR 340-150-0310(1)	Penalty Amount: \$ 150	Correct Violation by: 09/01/2025	Date Violation Corrected:
---	------------------------	----------------------------------	---------------------------

Violation #2: **Failure to conduct annual periodic operation and maintenance walkthrough inspection.**
***TCR:**

Corrective Action: Open, inspect, and record the observations of the UDCs under every dispenser once every month. Submit first months' walkthrough inspection form to DEQ.

Rule Citation: OAR 340-150-0315(a)(B)	Penalty Amount: \$ 150	Correct Violation by: 09/01/2025	Date Violation Corrected:
--	------------------------	----------------------------------	---------------------------

Violation #3:
***TCR:**

Corrective Action:

Rule Citation: OAR	Penalty Amount: \$	Correct Violation by:	Date Violation Corrected:
---------------------------	--------------------	-----------------------	---------------------------

Violation #4:
***TCR:**

Corrective Action:

Rule Citation: OAR	Penalty Amount: \$	Correct Violation by:	Date Violation Corrected:
---------------------------	--------------------	-----------------------	---------------------------

Violation #5:
***TCR:**

Corrective Action:

Rule Citation: OAR	Penalty Amount: \$	Correct Violation by:	Date Violation Corrected:
---------------------------	--------------------	-----------------------	---------------------------

Violation #6:
***TCR:**

Corrective Action:

Rule Citation: OAR	Penalty Amount: \$	Correct Violation by:	Date Violation Corrected:
---------------------------	--------------------	-----------------------	---------------------------

	Total Penalty Amount 300	
	(This Page): \$	

YOU MUST CORRECT THE VIOLATIONS AS REQUIRED, SIGN THE STATEMENT BELOW AND

RETURN THIS FORM TO THE DEQ INSPECTOR LISTED ON PAGE 1 ON OR BEFORE: _____ 09/15/2025 _____

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



Invoice

Bill To
Lufti Thabet Thabet Management 1700 Valley River Dr. Ste 300 Eugene, OR 97401
Site Address
Buy 2 76 4446 Old Hwy 99 South Roseburg, OR 97471

Terms	PO No.
Due Upon Receipt	n/a

APPROVED

Interest of 1-1/2% will be applied each month plus a \$25.00 billing fee for unpaid balances after 10 days.



Proposal 110123-6

Sam Alghasham
Thabet Management
4105 Franklin Blvd
Eugene, OR 97403

November 1, 2023

Site:

Buy 2 76
4446 Old Hwy 99 South
Roseburg, OR 97471

4C's is pleased to offer the following petroleum construction services to replace the two spill buckets at your Roseburg facility. The following is needed for a complete project.

Task 1: Permits:

- DEQ paperwork only.

Task 2: Demo:

- Provide saw cuts as need around existing manholes to provide access to existing spill buckets.
- Provide air compressor and jack hammer to remove concrete around existing spill buckets and dispose of it offsite.
- Remove existing spill buckets and dispose of it offsite.

Task3: Samples:

- No samples or lab work included we are assuming clean soil or pea rock with no suspected release.

Task 4: Spill Bucket Install:

- If the existing riser from the tank is in good condition, we will make ready for new spill buckets.
- Provide and install (2) OPW 1C-2200D 5-gallon spill containment bucket on existing riser for the Unleaded and diesel tanks.
- Reuse existing drop tubes.
- Provide and pour 4000psi concrete with rebar as needed with a medium broom finish for the spill buckets.
- The spill buckets lid will be painted standard API color or as directed.
- Includes new fill adaptor cap and tank ID collar for unleaded and diesel.

Initial Page 1 of 3

Task 5: Testing:

- The spill buckets will be water tested to DEQ/EPA standards with results passed on to the customer.

4C's Sub Total: \$6,497.00

Supplied Petroleum Equipment: \$2,015.48

Corporate Activity Tax: \$42.57

Project Total: \$8,555.05

Exclusion

- Relocation of any existing utilities has not been included.
- No SLUDGE or HAZARDOUS WASTE will be encountered, pumped, or disposed. Contamination of any kind
- No Special Inspections or Third-Party Testing have been included.
- Painting or image work of any kind.
- All existing electrical must be legal, installed correctly, and in reusable condition or additional charges will apply.
- System design and/or engineering are the responsibility of others, if needed.
- All fees and procurement time to get permits are on a time and material basis. We will provide DEQ notices only. Any changes due to the permit requirements will be considered a change.
- 4C's assumes salvage rights unless in writing prior to award.
- The results of soil samples HCID analysis will be not detected.
- No water will be encountered, sampled, pumped, or disposed.
- Utilities will not impact on the project and/or relocation of any existing utilities has not been included.
- System design and/or engineering is not provided.
- Electrical of any kind included disconnects.
- Existing concrete to be no more than 10" thick and no more than 6" thick elsewhere. Existing asphalt to be no more than 4"
- Existing drop tubes must be able to be removed in one piece. If any drop tube is stuck in the tank riser and needs to be chiseled out or the complete tank riser needs to be removed this will be considered an extra.
- All extras will be discussed with the owner or their agent before the extra work is performed.
- 4C's supplies a standard one-year warranty for their portion of the project for workmanship only. All material provided or installed is covered by the manufacturer's warranty only with no implied warranty beyond that by 4C's Environmental.

Pricing Good For 30 Days

Initial Page 2 of 3

AGREEMENT TO PROVIDE SERVICES

THIS AGREEMENT, dated this _____ day of _____, 2023 is made

BETWEEN the Client, _____

Referred to as "Client", and 4C's Environmental, Inc., referred to as "4C's".

1. **Services to Be Provided.** Client agrees to hire 4C's in accordance with proposal number **110123-6** attached hereto and is hereby incorporated into this contract.
2. **Payment.** Client agrees to pay 4C's for work to be performed under this contract as noted in the proposal. If 4C's requires a down payment it will be due prior to scheduling. If the down payment is not received the start date may be subject to change.
3. **Client's Responsibility.** Client must fully cooperate with 4C's and provide all information relevant to the issues involved in this matter. Client must also pay all bills as required by this Agreement.
4. **Taxes:** All taxes for the State of Washington or State of Oregon will be billed as a separate line item.
5. **Bills. All invoices are due upon receipt.** Client will be charged interest 1-1/2% monthly, a yearly rate of 18% on any remaining balance not paid within 10 days from the date of the bill and a \$25.00 billing fee for each additional bill sent to Client (not to exceed one bill per month). If the bill is not paid in full after 30 days, the account may be sent to collections and a lien shall be placed against the property. Client agrees to pay all costs of collection, including lien fees and attorney fees, if necessary. If account is sent to collections, there will be a 20% collections fee added.
6. **Hidden or Latent Conditions.** 4C's uses care to avoid damaging existing buildings, utilities, and equipment on the job site. If, after reasonable care is exercised by 4C's damage occurs, Client agrees to indemnify and hold 4C's harmless for that damage. 4C's shall not be liable for any special, indirect, or consequential damages, including, without limitation, loss of profits or business interruption, even if the damage is to property beyond the subject matter of this agreement. 4C's shall promptly give notice, verbal or written, to the client of subsurface or latent physical conditions at the site which differ materially from those ordinarily encountered, such as large rocks, water, contaminated soil, and utilities that can add to the overall cost of this agreement. Client agrees to compensate 4C's for these hidden or latent conditions on a time and materials basis for the additional work to be performed. The rates shall be \$75.00 per hour, the costs of any materials furnished and used by 4C's on the job, plus 20% mark-up.
7. **Choice of Law.** Any dispute under this Agreement or related to this agreement shall be decided in accordance with the laws of Oregon.
8. **Personal Guarantee.** The undersigned agrees to act as a personal guarantor and co-signer to this agreement for all debts incurred both now and in the future for all monies owed.

By: _____

Client Signature

Printed Name

4C's Environmental Inc.
1590 SE Uglow Ave
Dallas, OR 97338
Phone: 503-606-3020
Mobil: 503-320-2992

Initial Page 3 of 3

Underground Storage Tanks (UST) Program

Doc Type: Compliance Certification

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

Facility Information

Facility name: Buy2 - Old Hwy 99
 Facility address: 4446 Old Hwy 99 S Facility ID#: 4440
 Mailing address: _____
 City: Roseburg State: OR Zip code: 97470
 Owner name: Buy2
 Mailing address: 1700 Valley River Dr STE 400
 City: Eugene State: OR Zip code: 97401
 Phone: _____ Fax: _____ E-mail: _____

Testing Information

1. Tank number	1	2	3	4	5	
2. Product stored	Diesel 1	Diesel 2	Premium	Unleaded 1	Unleaded 2 (nearest road)	
3. Spill bucket capacity	5 gal	5 gal	5 gal	5 gal	5 gal	
4. Manufacturer	OPW	EBW	EMCO	OPW	EBW	
5. Construction	☒ Single-walled ☐ Double-walled	☒ Single-walled ☐ Double-walled	☒ Single-walled ☐ Double-walled	☒ Single-walled ☐ Double-walled	☒ Single-walled ☐ Double-walled	☐ Single-walled ☐ Double-walled
6. Test type	☒ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled	☒ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled	☒ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled	☒ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled	☒ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled	☐ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled
7. Spill bucket type	☒ Product ☐ Vapor	☒ Product ☐ Vapor	☒ Product ☐ Vapor	☒ Product ☐ Vapor	☒ Product ☐ Vapor	☐ Product ☐ Vapor
8. Liquid and debris removed from spill bucket:*	☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No	☐ Yes ☐ No
9. Visual inspection (No cracks, loose parts or separation of the bucket from the fill pipe.)?	☒ Pass ☐ Fail	☒ Pass ☐ Fail	☒ Pass ☐ Fail	☒ Pass ☐ Fail	☒ Pass ☐ Fail	☐ Pass ☐ Fail
10. Tank riser cap included in test?	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
11. Is drain valve included in test?	☒ Yes ☐ No ☐ NA	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☒ NA	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
12. Starting level	10"	7"	9.5"	9.5"	10"	
13. Test start time	11:30am	11:30am	11:30am	11:30am	11:30am	
14. Ending level	10"	7"	9.5"	5"	10"	
15. Test end time	12:30pm	12:30pm	12:30pm	12:30pm	12:30pm	
16. Test period	1 hour	1 hour	1 hour	1 hour	1 hour	
16. Level change	0"	0"	0"	4.5"	0"	
Test results:	☒ Pass ☐ Fail	☒ Pass ☐ Fail	☒ Pass ☐ Fail	☐ Pass ☒ Fail	☒ Pass ☐ Fail	☐ Pass ☐ Fail

Pass/fail criteria: Must pass visual inspection. Hydrostatic: Water level drop of less than 1/8 inch; Vacuum single-walled only; Maintain at least 26 inches water column; Vacuum double-walled; maintain at least 12 inches water column.

Comments:

* All liquids and debris must be disposed of properly.

Testing company name: Petroleum Compliance Services LLC Tester's name: Kenneth Pike
 Date (mm/dd/yyyy): 6-25-2025 Tester's signature: Kenneth Pike

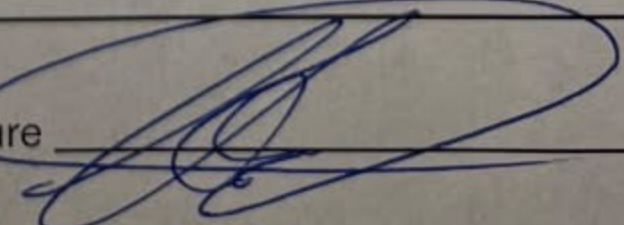
APPENDIX C-3

SPILL BUCKET INTEGRITY TESTING HYDROSTATIC TEST METHOD SINGLE AND DOUBLE-WALLED VACUUM TEST METHOD

Facility Name: <u>Buy 2-76</u>	Owner:					
Address: <u>4440 Old Hwy 99 S</u>	Address:					
City, State, Zip Code: <u>Roseburg</u>	City, State, Zip Code:					
Facility I.D. #: <u>4440</u>	Phone #:					
Testing Company: <u>Peak Environmental</u>	Phone #:					Date: <u>July 9, 2025</u>
This procedure is to test the leak integrity of single- and double-walled spill buckets. See PEI/RP1200, Section 6.2 for hydrostatic test method, Section 6.3 for single-walled vacuum test method and Section 6.4 for double-walled vacuum test method.						
Tank Number	<u>4</u>					
Product Stored	<u>Regular</u>					
Spill Bucket Capacity	<u>5 gal</u>					
Manufacturer	<u>EBW</u>					
Construction	☒ Single-walled ☐ Double-walled	☐ Single-walled ☐ Double-walled	☐ Single-walled ☐ Double-walled	☐ Single-walled ☐ Double-walled	☐ Single-walled ☐ Double-walled	☐ Single-walled ☐ Double-walled
Test Type	☒ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled	☐ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled	☐ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled	☐ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled	☐ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled	☐ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled
Spill Bucket Type	☒ Product ☐ Vapor	☐ Product ☐ Vapor	☐ Product ☐ Vapor	☐ Product ☐ Vapor	☐ Product ☐ Vapor	☐ Product ☐ Vapor
Liquid and debris removed from spill bucket?*	☒ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
Visual Inspection (No cracks, loose parts or separation of the bucket from the fill pipe.)	☒ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail
Tank riser cap included in test?	☒ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
Is drain valve included in test?	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
Starting Level	<u>10"</u>					
Test Start Time	<u>5 pm</u>					
Ending Level	<u>10"</u>					
Test End Time	<u>6 pm</u>					
Test Period	<u>1 hr</u>					
Level Change	<u>0</u>					
Pass/fail criteria: Must pass visual inspection. Hydrostatic: Water level drop of less than 1/8 inch; Vacuum single-walled only: Maintain at least 26 inches water column; Vacuum double-walled: maintain at least 12 inches water column.						
Test Results	☒ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail
Comments:						

*All liquids and debris must be disposed of properly.

Tester's Name Stephen Shoemaker

Tester's Signature 

APPENDIX C-3

SPILL BUCKET INTEGRITY TESTING HYDROSTATIC TEST METHOD SINGLE AND DOUBLE-WALLED VACUUM TEST METHOD

Facility Name: <u>76</u>	Owner:
Address: <u>4446 Old Hwy 99 S</u>	Address:
City, State, Zip Code: <u>Roseburg, OR 97471</u>	City, State, Zip Code:
Facility I.D. #:	Phone #:
Testing Company: <u>Peak Environmental</u>	Phone #: <u> </u> Date: <u>Aug 21, 2025</u>

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

Tank Number	<u>1</u>					
Product Stored	<u>Reg</u>					
Spill Bucket Capacity	<u>5 gal</u>					
Manufacturer	<u>ERW</u>					
Construction	☐ Single-walled ☒ Double-walled	☐ Single-walled ☐ Double-walled	☐ Single-walled ☐ Double-walled	☐ Single-walled ☐ Double-walled	☐ Single-walled ☐ Double-walled	☐ Single-walled ☐ Double-walled
Test Type	☒ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled	☐ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled	☐ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled	☐ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled	☐ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled	☐ Hydrostatic ☐ Vacuum ☐ Single-walled ☐ Double-walled
Spill Bucket Type	☒ Product ☐ Vapor	☐ Product ☐ Vapor	☐ Product ☐ Vapor	☐ Product ☐ Vapor	☐ Product ☐ Vapor	☐ Product ☐ Vapor
Liquid and debris removed from spill bucket?*	☒ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
Visual Inspection (No cracks, loose parts or separation of the bucket from the fill pipe.)	☒ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail
Tank riser cap included in test?	☒ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
Is drain valve included in test?	☐ Yes ☒ No ☐ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
Starting Level	<u>11"</u>					
Test Start Time	<u>8:00</u>					
Ending Level	<u>11"</u>					
Test End Time	<u>9:10</u>					
Test Period	<u>1hr</u>					
Level Change	<u>0</u>					

Pass/fail criteria: Must pass visual inspection. Hydrostatic: Water level drop of less than 1/8 inch; Vacuum single-walled only: Maintain at least 26 inches water column; Vacuum double-walled: maintain at least 12 inches water column.

Test Results	☒ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail
--------------	--	---	---	---	---	---

Comments:

*All liquids and debris must be disposed of properly.

Tester's Name Stephen Schreemaker

Tester's Signature [Signature]

Re: Results of Full Compliance Inspection 4446 Old Hwy 99S Fac 04440

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

Date Mon 9/22/2025 3:19 PM

To TMI Fuel <TMI-Fuel@buy2stores.com>; UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>; PARDUE Dave * DEQ <Dave.PARDUE@deq.oregon.gov>

Thank you for sending this over.

The UST inspection for DEQ facility 4440 Buy2 026 located at 4446 old hwy 99s Roseburg, OR is **officially CLOSED and COMPLETE**

Thank you for keeping your facility in compliance with Oregon rules and regulations.



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: TMI Fuel <TMI-Fuel@buy2stores.com>

Sent: Monday, September 22, 2025 10:20 AM

To: LITKE Emily * DEQ <Emily.LITKE@deq.oregon.gov>; UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>; PARDUE Dave * DEQ <Dave.PARDUE@deq.oregon.gov>

Subject: Re: Results of Full Compliance Inspection 4446 Old Hwy 99S Fac 04440

Hi Emily,

Please find the attached paperwork for the unleaded spill bucket.

Best,

Ali Kulaib

Fuel Director

Thabet Management Inc

O: (+1) 541-565-4472

M: (+1) 541-914-1026

E: tmi-fuel@buy2stores.com

Addres:1700 Valley River Dr. 2nd Floor
Eugene, OR 97401

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

Sent: Friday, September 19, 2025 5:49 PM

To: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>; TMI Fuel <TMI-Fuel@buy2stores.com>; PARDUE Dave * DEQ <Dave.PARDUE@deq.oregon.gov>

Subject: Re: Results of Full Compliance Inspection 4446 Old Hwy 99S Fac 04440

Good afternoon,

Payment of the penalty was processed already, but the DEQ has not received documentation regarding the unleaded 1 spill bucket repair/replacement.

Email the work invoice and passing spill bucket test to this email thread



Emily Litke (she/her)

Duty Officer, Underground Storage Tanks

DEQ Headquarters, Land Quality Division

700 NE Multnomah Street, Suite 600

Portland OR 97232-4100

503-806-9516

Emily.LITKE@deq.oregon.gov

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

Sent: Friday, August 15, 2025 3:43 PM

To: TMI Fuel <TMI-Fuel@buy2stores.com>; PARDUE Dave * DEQ <Dave.PARDUE@deq.oregon.gov>

Cc: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>

Subject: Re: Results of Full Compliance Inspection 4446 Old Hwy 99S Fac 04440

Good afternoon,

UST facility 4440 Buy2 #026 located at 4446 Old Hwy 99s Roseburg, OR

Please review the attached field citation. The deadline for payment of the \$300 penalty is 9/15/25. The deadline for documentation regarding the spill bucket is 9/1/25.

Thank you for sending the updates regarding the unleaded 1 spill bucket repair/replacement. I understand that you received a quote from Peak Environmental. Please email with the completed work order and passing spill bucket test.

Payment of Field Citation Penalty Instructions

Payment can be made either through **check** or **online** through Your DEQ Online – follow the link below to create an account.

[Department of Environmental Quality : Welcome to Your DEQ Online : Online Services : State of Oregon](#)

[PaymentsforEEOs.pdf](#) – step by step instructions for submitting payments online

Questions about online payments and submittals can be directed to the Help Desk at

itservicedesk@deq.oregon.gov or

[Your DEQ Online Helpdesk - Jira Service Management](#) –

From: TMI Fuel <TMI-Fuel@buy2stores.com>

Sent: Thursday, August 14, 2025 12:27 PM

To: PARDUE Dave * DEQ <Dave.PARDUE@deq.oregon.gov>

Cc: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>

Subject: Re: Results of Full Compliance Inspection 4446 Old Hwy 99S Fac 04440

Hi All,

Please find the requested documents regarding the spill buckets.

Kindly note that the spill buckets were replaced in 2023, and unfortunately, 4cs is not able to locate and provide us with the repair documents. See the attached invoice. Furthermore, PCS did the retesting for the spill buckets; see the attached file. Finally, we had a new failure in one of the spilled buckets, and Peak Environmental is scheduled to work on it. See the attached contract.

Best,

Ali Kulaib

Fuel Director

Thabet Management Inc

O: (+1) 541-565-4472

M: (+1) 541-914-1026

E: tmi-fuel@buy2stores.com

Addres:1700 Valley River Dr. 2nd Floor
Eugene, OR 97401

From: PARDUE Dave * DEQ <Dave.PARDUE@deq.oregon.gov>
Sent: Thursday, August 14, 2025 2:44 PM
To: TMI Fuel <TMI-Fuel@buy2stores.com>
Cc: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>
Subject: Results of Full Compliance Inspection 4446 Old Hwy 99S Fac 04440

Hello Lutfi Thabet–

Thank you for facilitating my inspection of your facility on July 17, 2025. I appreciate you having Alex Goucher meet me on-site to assist with the inspection by opening the sumps/equipment for visual observation.

The facility had some compliance issues which need to be addressed as discussed below.

Equipment (at the time of inspection) appeared to be in good order except for the following:

1. Replacement of 2 spill buckets that failed 2023 testing appears to have been performed, but no records of the repair or retesting are available.

Documentation

1. Monthly walkthrough inspections are not being performed. The daily inspection logs you keep at your facilities are almost sufficient, but do not include one thing: **checking the under-dispenser containment-the UDCs**. This is a required monthly check that must be documented. Note that the forms you submitted (that lack the UDC inspection) may be in use across many of your facilities.

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; see below for the violation/corrective action.

Alleged Violations:

1. Failure to retest spill buckets after installation and submit compliance certification statement. 340-150-0310(1). C1c.
2. Failure to perform complete Monthly Operation and Maintenance Walkthrough inspections 340-150-0315(1)(a)(A). A16.

Corrective Action- begin immediately.

1. Send spill bucket repair/replacement/retesting documentation to DEQ **by September 01, 2025**.
2. **Open, inspect, and record the observations of the UDCs under every dispenser once every month.** Collect complete information on forms to record Monthly Walkthrough inspections, and maintain the records on site for the last 12 months, on a rolling basis, for example the last half of 2024 and first half of 2025. You may use the form found here: <https://www.oregon.gov/deq/tanks/pages/ustcomplianceforms.aspx> (which also has some helpful reminders). Complete and submit to DEQ the first Monthly Operation and Maintenance Walkthrough inspection form by **September 01, 2025**.

Next Steps –

Please direct your responses to ust.dutyofficer@deq.oregon.gov. This team will work with me on documents you submit or corrective actions completed to ensure the work is sufficient to close the inspection.

These violations will fit into the field citation guidance and that team will issue enforcement based off a preset calculation matrix.

Regards,

Dave

Dave Pardue
UST Program Coordinator and Inspector
503-360-4287

New UST Service Provider Rules: <https://www.oregon.gov/deq/rulemaking/pages/ust2025.aspx>

YDO is now live for the UST Program- Set up your account here:

<https://www.oregon.gov/deq/permits/Pages/UST-in-YDO.aspx>

To manage your account and link facilities see this link:

<https://www.oregon.gov/deq/permits/Documents/YDO-Account-Registration-and-Management.pdf>