



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 014
1700 Valley River Dr Ste 400
Eugene, OR 97401

RE: UST Compliance Inspection
DEQ UST #6259
Buy2 014, 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 130 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 Program
Technical Compliance Inspection - UST Inspection Report

Inspector: Dave Pardue

Date: 7/17/2025

130

Facility: 6259

I. Site Information

Facility Name:	Buy2 014	Permittee:	Lutfi Thabet	Contact:	Alex
Site Address:	1320 W Harvard	Organizatic	Thabet Mgmt- Ali	Phone:	541-968-9506
City:	Roseburg	Phone:	541-914-1026		

II. Tank Information

DEQ Permit #	AKFHJ	1	AKFJK	2	AKFJA	3	AHEEH	6
Estimated Gallons	12000		10000	Leg	12000		8000	
Substance	GAS R		DIESEL	from	GAS Prem Dies		GAS Leg? Dies	
Tank Material	SW STEEL		SW STEEL		SW STEEL		COMPOSITE	
Tank Install Date	1966		1976		1966		1989	
Pipe Material	DW-flex		DW-flex		DW-flex		DW-flex	
Pipe Type	press		press		press		PRESS	
Pipe Install Date								
Overfill Device	alarm		alarm		alarm		alarm	

Notes and Comments from the UST database:

☐ Check file before conducting inspection

Tanks 1 and 3 manifolded together- 1 turbine. CP testing in 2017
lots of ethanol corrosion

small crack in regular spill bucket

Road

T1 = heavy corr in man sump

543-573

No sensor → 1 3 No open boat sensor ✓

If tanks are manifolded, which tanks:

III. Operating Certificate

Compliance

☒ Yes

☐ No

☒ Current

☒ Accurate

☐ Posted for delivery drive to observe

IV. Operator Training

Compliance

☒ Yes

☐ No

Class A/B Operator

☒ Yes

☐ No

Name:

Alex Goucher

Date:

Class C Operator

☒ Yes

☐ No

☐ Cardlock

Steven Dehart

7/9/24

V. Financial Responsibility

Compliance

☒ Yes

☐ No

Type of coverage:

sent ✓
vs. on site

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

VI. Walkthrough Requirements

Compliance

☐ Yes

☒ No

Spill prevention and release detection equipment checked monthly?

in correct form

☐ Yes

☐ No

Tank top sumps checked annually?

☒ Yes

☐ No

VII. Release Detection

Compliance

☒ Yes

☐ No

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

Date of last testing:

6/28/24

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:

6/28/24

Last three tests available?

☒ Yes

☐ No

Number of lines tested:

Auto LLD 3

Number of LD tested:

3

Leak detector manufacturer make and model:

VR Auto LLD

Tank gauge manufacturer make and model:

Veeder Root

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?

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

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: 7/18/2025

Time: 1:30

Facility: 6259

VIII. Spill Prevention

Compliance

☐ Yes ☐ No

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

Number of spill buckets tested? 4

Did spill bucket pass most recent testing? ☐ Yes ☒ NoIf no, was spill bucket replaced/repaired? ☒ Yes ☐ NoDuring inspection, visual damage to spill bucket? ☐ Yes ☒ No

was repaired / Contract signed to 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: 6-28-24

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: 6/29/2023

Last two tests available? partial from 2020-rectifier

☐ Yes☒ No

prev cited?

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

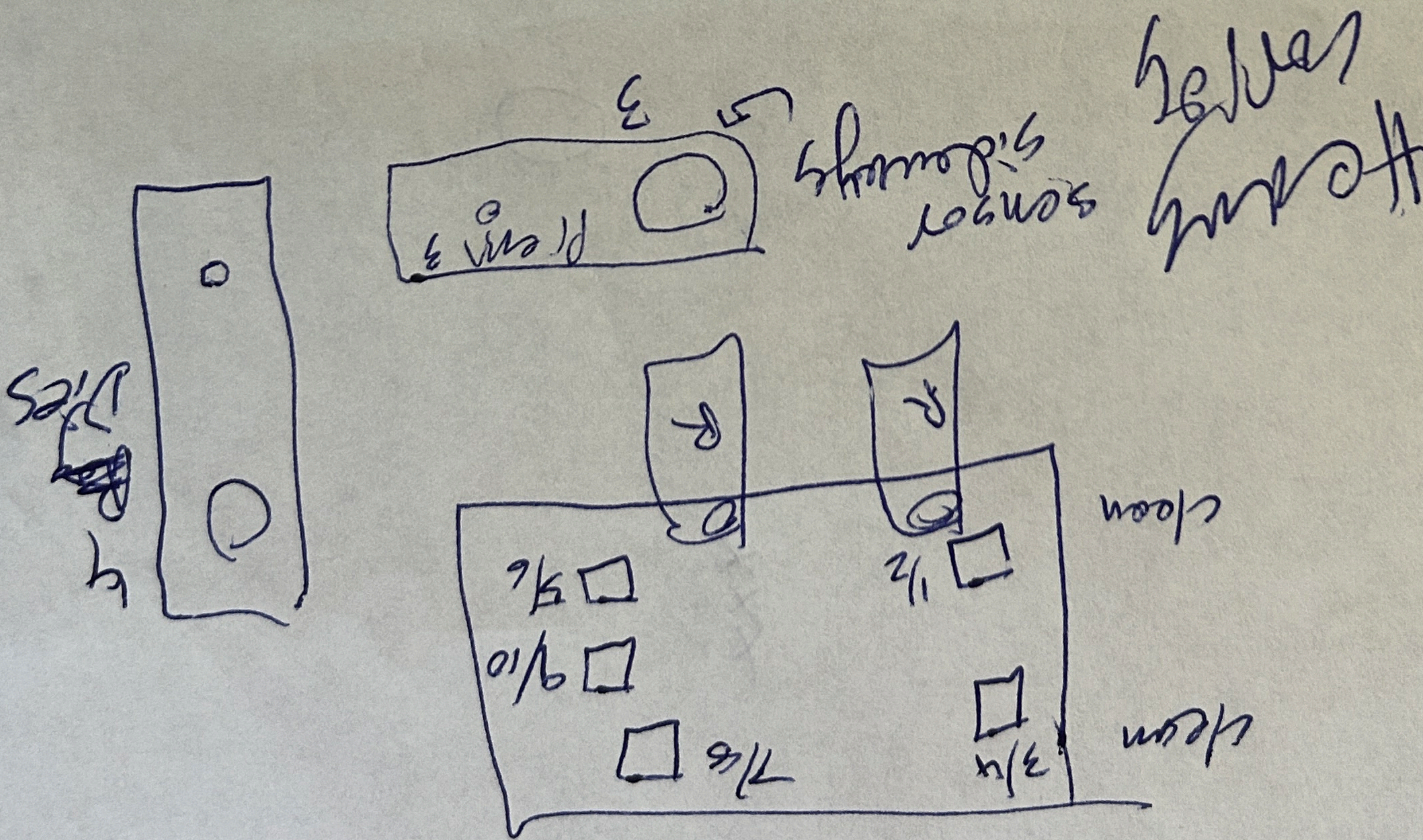
XI. General notes from inspection

Representative onsite:

Alex Gaudier

email:

maintenance@tim-fuel.com



Compliance Determination:

☐ No Violations Observed

☒ Observed violations resulting in enforcement

Inspector Signature:

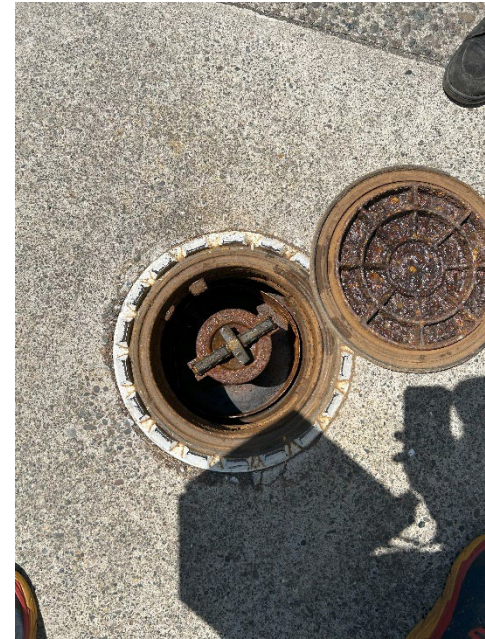
D. Gaudier

Date:

7/17/25



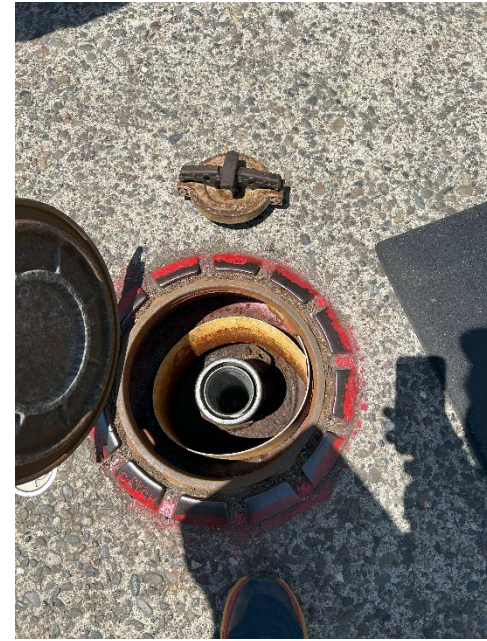
1: Tank nest



2: Regular fill



3: Regular TT Sump



4: Regular fill



5: Regular siphon



6: Diesel TT Sump



7: Premium TT Sump



8: Dispenser 1/2



9: UDC 1/2



10: Dispenser 6/7



11: UDC 6/7



12: UDC 7/8



13: UDC 9/10



Program Enforcement No. 2025-FC-9959

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#:	6259
Inspector:	Dave Pardue	Facility Name:	BUY2 014
DEQ Office:	700 NE Multnomah St	Facility Address:	1320 W HARVARD, 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.				\$ 450

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-9959

FACILITY ID: 6259

Page 3 of 3

Violation #1:	Failure to maintain records from the last two 3-year cathodic protection inspections/tests		
*TCR:			
Corrective Action:	Cathodic protection testing completed. No additional response required.		
Rule Citation: OAR 340-150-0325(6)(b)	Penalty Amount: \$ 300	Correct Violation by: n/a	Date Violation Corrected: 08/15/2025
Violation #2:	Failure to conduct annual periodic operation and maintenance walkthrough inspection.		
*TCR:			
Corrective Action:	submit one month of monthly Walkthrough inspections using the form provided. Submit by September 15, 2025.		
Rule Citation: OAR 340-150-0315(a)(B)	Penalty Amount: \$ 150	Correct Violation by: 09/15/2025	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 450		
	(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

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 - Harvard 76
 Facility address: 1320 W HARVARD Facility ID#: 6259
 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		
2. Product stored	On-Road Diesel	Premium Unleaded	Regular Unleaded 1 (primary)	Regular Unleaded 2 (siphon)		
3. Spill bucket capacity	5 gal	5 gal	5 gal	5 gal		
4. Manufacturer	EBW	EBW	OPW	OPW		
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	8"	7"	8"	8"		
13. Test start time	11:15am	11:15am	11:15am	11:15am		
14. Ending level	8"	7"	8"	8"		
15. Test end time	12:15pm	12:15pm	12:15pm	12:15pm		
16. Test period	1 hour	1 hour	1 hour	1 hour		
16. Level change	0"	0"	0"	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): 6-26-2025 Tester's signature: Kenneth Pike

Re: Results of Full Compliance Inspection 1320 W Harvard St Fac 06259

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

Date Fri 8/15/2025 8:02 AM

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

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

 5 attachments (1 MB)

Buy 2 W Harvard UST CP Field Data, Roseburg, OR, 6-16-20.pdf; Buy 2 Harvard Ave UST CP Survey, Roseburg, OR, 6-29-2023.pdf; Buy 2 W Harvard UST CP Survey, Roseburg, OR, 6-16-20.pdf; Buy 2 Harvard Ave UST CP Field Data, Roseburg, OR, 6-29-2023.pdf; Buy 2 Harvard Ave UST CP Site Map, Roseburg, OR, 6-29-2023.pdf;

Hi Dave,

Thank you for your email. Kindly click the link to find the cathodic protection test reports .
https://buy2stores-my.sharepoint.com/:f:/p/gtmts/Elf_GM1waUVOnWxdNCuii48Bi0n3u-KqKCIWhYQXv62NWA?e=fUJWzF

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: Wednesday, August 13, 2025 7:23 PM

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

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

Subject: Results of Full Compliance Inspection 1320 W Harvard St Fac 06259

Hello Lutfi Thabet–

Thank you for facilitating my inspection of your facility on June 23, 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. Severe corrosion was noted on flex lines and turbines. This is an air quality violation-- the source of vapor in the sumps should be identified and repaired because the corrosion will eventually cause equipment failure and could result in a large release.

Documentation

1. The next to last cathodic protection test report was not provided- the last two test reports must be retained.
2. 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 maintain records from the last two 3-year corrosion protection tests. 340-150-0325(6)(b). D.9a.
2. Failure to perform complete Monthly Operation and Maintenance Walkthrough inspections 340-150-0315(1)(a)(A). A16.

Corrective Action- begin immediately.

1. Conduct corrosion protection tests every 3 years- maintain records of the last two tests.
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 15, 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>

RE: Results of Full Compliance Inspection 1320 W Harvard St Fac 06259

From PARDUE Dave * DEQ <Dave.PARDUE@deq.oregon.gov>
Date Fri 8/15/2025 7:51 AM
To UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>

Hi Emily-

Oops on the date: July 17 is correct.
I should have stated "In the future, maintain the last two inspection reports from corrosion protection testing". They are up to date- no testing needed as a corrective action.

Thanks,
Dave

From: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>
Sent: Thursday, August 14, 2025 11:52 AM
To: PARDUE Dave * DEQ <Dave.PARDUE@deq.oregon.gov>
Subject: Fw: Results of Full Compliance Inspection 1320 W Harvard St Fac 06259

Hey Dave,

I have a question about the corrective actions and need a little clarification.

Do you want the facility to submit CP testing? or was this violation due to a records issue and they already completed CP testing?

- its hard to tell what you want for the corrective action.

Also could you clarify the date of the inspection. Your email states June 23 2025 and your inspection report states July 17 2025.



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

From: PARDUE Dave * DEQ <Dave.PARDUE@deq.oregon.gov>
Sent: Wednesday, August 13, 2025 4:23 PM
To: TMI-Fuel@buy2stores.com <tmi-fuel@buy2stores.com>
Cc: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>
Subject: Results of Full Compliance Inspection 1320 W Harvard St Fac 06259

Hello Lutfi Thabet–

Thank you for facilitating my inspection of your facility on June 23, 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. Severe corrosion was noted on flex lines and turbines. This is an air quality violation-- the source of vapor in the sumps should identified and repaired because the corrosion will eventually cause equipment failure and could result in a large release.

Documentation

1. The next to last cathodic protection test report was not provided-- the last two test reports must be retained.
2. 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 maintain records from the last two 3-year corrosion protection tests. 340-150-0325(6)(b). D.9a.
2. Failure to perform complete Monthly Operation and Maintenance Walkthrough inspections 340-150-0315(1)(a)(A). A16.

Corrective Action- begin immediately.

1. Conduct corrosion protection tests every 3 years- maintain records of the last two tests.
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 15, 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>

Fee

\$ 450.00

—

Paid

\$ 450.00

=

Due

\$ 0.00

Penalty

▶ 2025-fc-9959

ⓘ UST - Field Citation

\$ 450.00

1 Results

⊕ Add Penalty

➡ Send to FIMS

Payment

▼ Check by Mail 9914573558

📅 9/15/2025

ⓘ 54973

\$ 450.00

Type

Check by Mail

Amount

450

E-Payment Confirmation#

E-Payment Settle Date

mm/dd/yyyy

Ref#

Payment Date

09/15/2025

Comments

2025-FC-9959

(Remaining Length: 3988)

Site Info

BUY2 014



1320 W HARVARD, ROSEBURG, OR 97470

83149 ✓

299196

CEM_FacilityIdentifier=22175 UST (6259)

Stationary

Inspection Info

10494 Completed

UST

Full Compliance Inspection (FCI) TCR only

Start Date 7/17/2025

End Date 7/17/2025

Created & Updated Info