



Oregon

Kate Brown, 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

May 19, 2025

Reyna Mendez Circle K
Stores, Inc 255 E. Rincon St
#100 Corona, CA 92879

RE: UST Compliance Inspection
Circle K #9644, Florence OR
DEQ UST #713

Attention Reyna Mendez:

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(s), 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 Thursday, June 5, 2025. The inspection will start at approximately 9:30 am.

Please read this entire notice and contact the DEQ inspector if you have questions about the upcoming inspection.

The inspections will require uninterrupted participation and attendance by you or a knowledgeable assistant. For the inspections 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.

The DEQ requests the following documentation be submitted electronically prior to the inspection to diana.foss@deq.oregon.gov. If these records cannot be submitted prior to the inspection, please have them available for review at the facility.

- Line and leak detector testing results for the past three years,
- Monthly tank leak detection records for the past 2 months,
- Class A, B, and C training documentation,
- Current, valid proof of financial responsibility,
- Annual tank gauge certification records for the past three years
- The past two spill prevention testing records
- Monthly walkthroughs,
- The past two overfill prevention equipment testing records,
- The past two cathodic protection testing records (if applicable).

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 and significant compliance deficiencies, will go through a longer and more formal process through the Office of Compliance and Enforcement and can potentially lead to larger 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 Inspector
UST Compliance Program

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

Inspector: Diana Foss

Date: 6/5/2025

Time: _____

Facility: 713

I. Site Information					
Facility Name: Circle K #9644		Permittee: Reyna Mendez		Contact: Albert Jiminez	
Site Address: 951 Hwy 101		Organization: Circle K Stores		Phone: 360-799-4015	
City: Florence		Phone: 657-262-2358		Amy Leach Tanknology	
II. Tank Information					
DEQ Permit #	BBKAD	BBKAF	BBKAG	BBDHD	
Estimated Gallons	6000	8000	8000	6000	
Substance	gas	gas	gas	gas	
Tank Material	STip3	STip3	STip3	Composite	
Tank Install Date	2/27/1988	2/27/1988	2/27/1988	9/19/1994	
Pipe Material	Flex plastic Environ	Flex plastic Environ	Flex plastic Environ	Flex plastic Environ	
Pipe Type	Pressure	Pressure	Pressure	Pressure	
Pipe Install Date					
Overfill Device	Alarm	Alarm	Alarm	Alarm	
Notes and Comments from the UST database: ☐ Check file before conducting inspection Collapsed syphon line Last CP test 8/9/2019: need 2022 If tanks are manifolded, which tanks: BBKAD & BBDHD (the 2 6ks)					
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: _____ Date: _____ Class C Operator ☐ Yes ☐ No ☐ Cardlock					
V. Financial Responsibility			Compliance ☐ Yes ☐ No		
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					
VI. Walkthrough Requirements			Compliance ☐ Yes ☐ No		
Spill prevention and release detection equipment checked monthly?			☐ Yes ☐ No		
Tank top sumps checked annually?			☐ Yes ☐ No		

☐ No☐ No☐ No

Number of LD tested:_____

☐ No☐ No☐ No☐ No☐ No

Presence of water in sumps? ☐ Yes ☐ No

Check valve directly below suction pump? ☐ Yes ☐ No

☐ No☐ No☐ No☐ No

(Static tests require tank to be 50% full for a valid test)

☐ SIR Ensure pass or fail results within 30-day period. Inconclusive result means release detection requirement not met

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: _____ 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			
☐ 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			
<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: _____			
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 lest test? _____			
Pressure test conducted after tank lining inspection? ☐ Yes ☐ No			

XI. General notes from inspection

Representative onsite: _____

email: _____

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

Inspector Signature: _____

Date: _____

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

Inspector: Diana Foss

Date: 6/5/2025

Time: _____

Facility: 713

I. Site Information					
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City: Florence		Phone: 657-262-2358		Amy Leach Tanknology	
II. Tank Information					
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Estimated Gallons	6000	8000	8000	6000	
Substance	gas	gas	gas	gas	
Tank Material	STIp3	STIp3	STIp3	Composite	
Tank Install Date	2/27/1988	2/27/1988	2/27/1988	9/19/1994	
Pipe Material	Flex plastic Environ	Flex plastic Environ	Flex plastic Environ	Flex plastic Environ	
Pipe Type	Pressure	Pressure	Pressure	Pressure	
Pipe Install Date					
Overfill Device	Alarm	Alarm	Alarm	Alarm	
Notes and Comments from the UST database: ☐ Check file before conducting inspection Collapsed syphon line Last CP test 8/9/2019: need 2022 <i>reppin Jan + Feb 2024 ?</i> If tanks are manifolded, which tanks: BBKAD & BBDHD (the 2 6ks)					
III. Operating Certificate					
☐ Current ☐ Accurate ☐ Posted for delivery drive to observe			Compliance ☒ Yes ☐ No		
IV. Operator Training					
Class A/B Operator ☒ Yes ☐ No Name: <i>Robert Watson</i> Date: <i>8/11/22</i>			Compliance ☒ Yes ☐ No		
Class C Operator ☒ Yes ☐ No ☐ Cardlock					
V. Financial Responsibility					
Type of coverage: <i>guarantee</i> Begin Date: <i>7/22/24</i> End Date: <i>7/22/25</i>			Compliance ☒ Yes ☐ No		
Coverage amount correct: <i>yes</i> Number of tanks covered: <i>4</i>					
Financial responsibility could also be in the form of self insurance, bonds, local government, trust fund, and or guarantee					
VI. Walkthrough Requirements					
Spill prevention and release detection equipment checked monthly? <i>yes</i>			Compliance ☒ Yes ☐ No		
Tank top sumps checked annually? <i>yes</i>			Compliance ☒ Yes ☐ No		

no 2023 test
no overhaul

VII. Release Detection

Compliance

☐ Yes ☐ No

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

Date of last testing: 3/26/25

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: 3/26/25

Last three tests available? ☐ Yes ☐ No

Number of lines tested: 3

Number of LD tested: 3

Leak detector manufacturer make and model: _____

Tank gauge manufacturer make and model: _____

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: 3/7/24

Last two tests available? ☐ Yes ☐ No

Date of last sensor testing: 3/26/25

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

2025

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

tested 1 vapor

Inspector: _____ Date: _____ Time: _____ Facility: _____

VIII. Spill Prevention Compliance ☐ Yes ☒ No

Date(s) of testing: 3/7/24 Number of spill buckets tested? 2

Did spill bucket pass most recent testing? ☐ Yes ☐ No If no, was spill bucket replaced/repaired? ☐ Yes ☐ No

During inspection, visual damage to spill bucket? ☐ Yes ☐ No

☐ 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: None

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: _____

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? _____

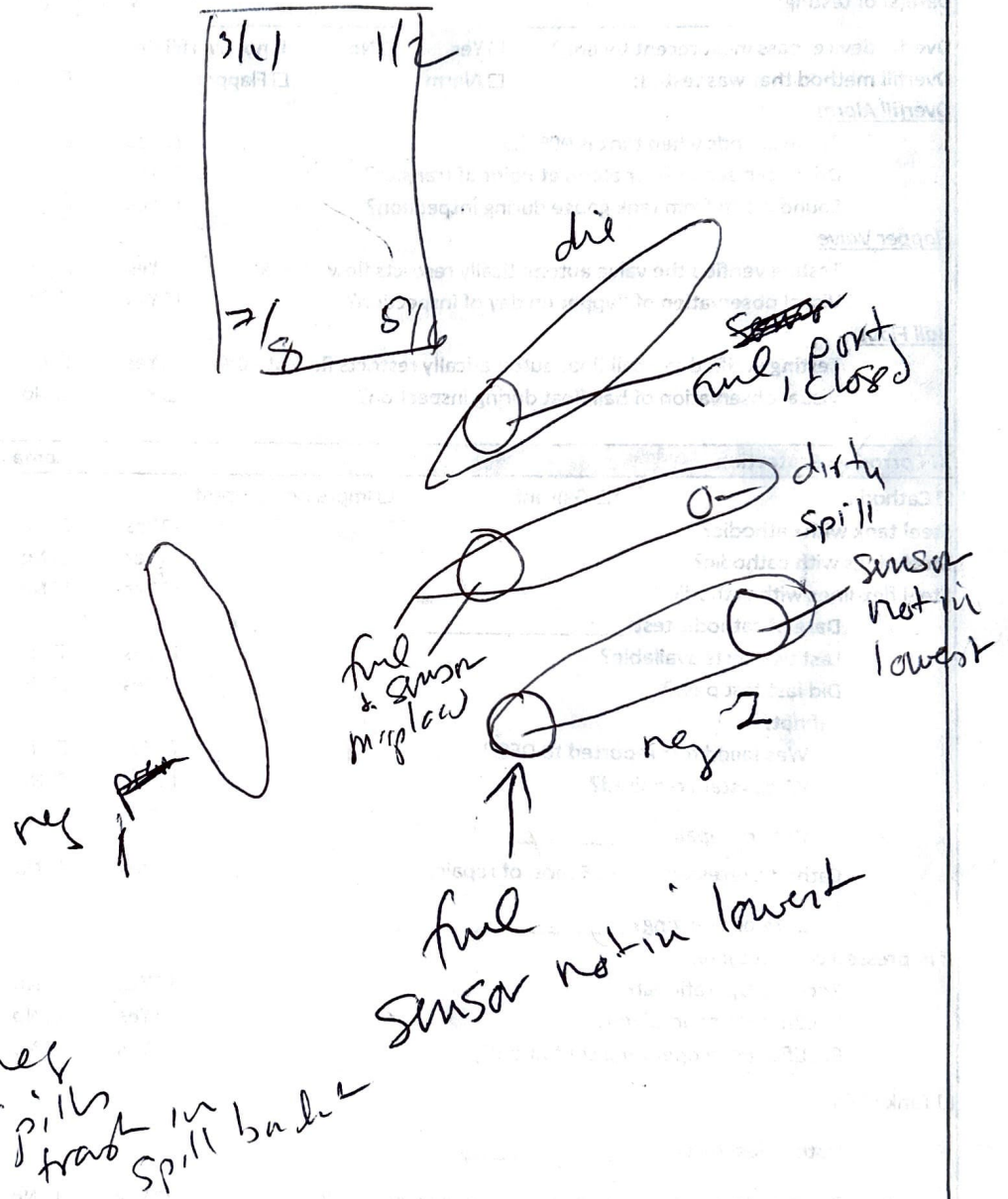
Pressure test conducted after tank lining inspection? ☐ Yes ☐ No

XI. General notes from inspection

Representative onsite: _____

email: _____

2709644@circlek.com



Compliance Determination:

☐ No Violations Observed

☐ Observed violations resulting in enforcement

Inspector Signature: _____

Date: _____

Inspection Survey

Submitted by: diana.foss_deq

Submitted time: Jun 5, 2025, 11:09:33 AM

Date

Jun 5, 2025

Time

09:48

UST Facility ID

713

Inspector

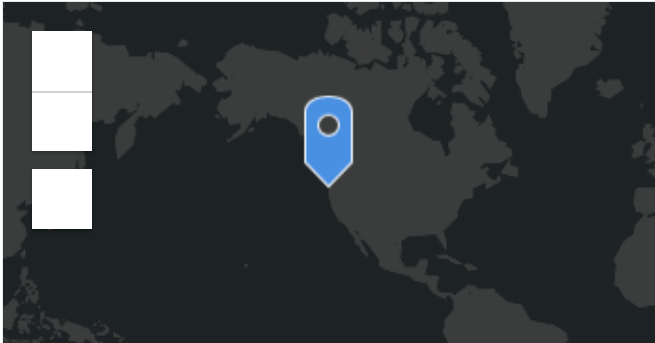
Foss

Type of Inspection

Full Compliance

Location

Lat: 43.975411 Lon: -124.103079



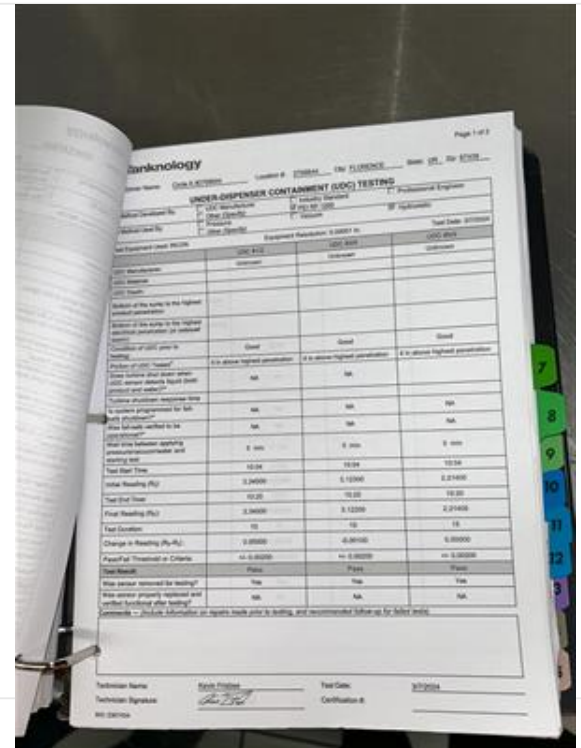
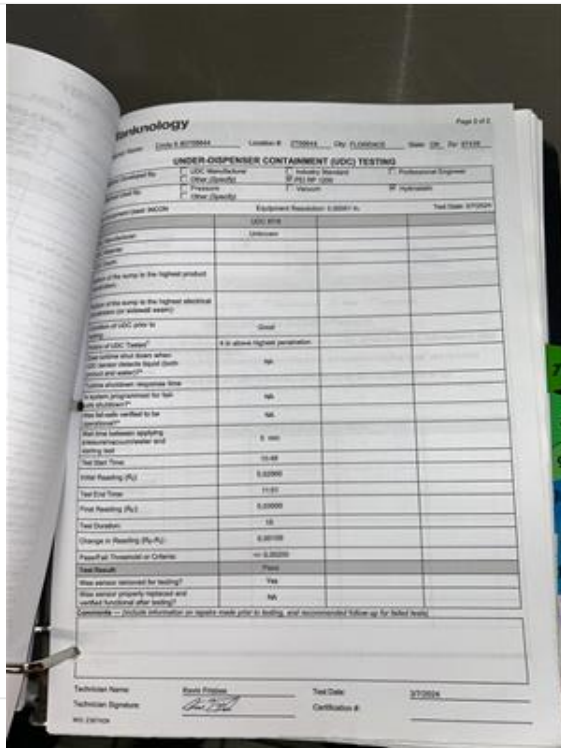
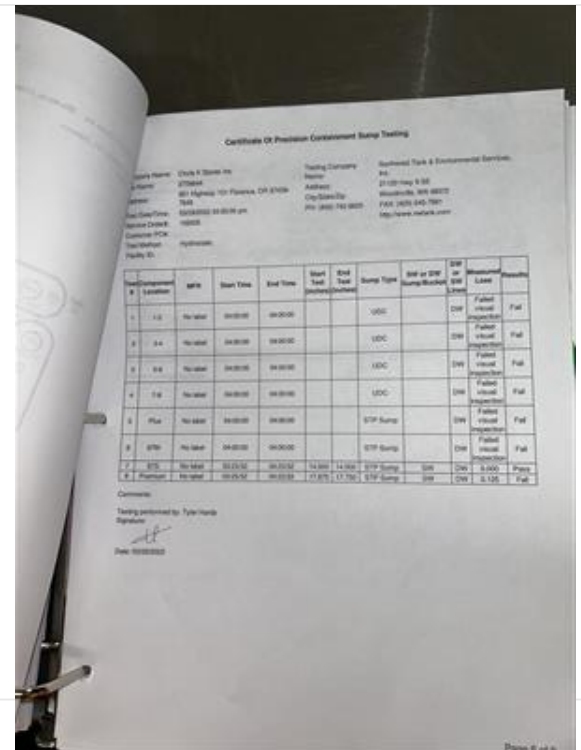
Esri, FAO, NOAA, USGS

Powered by Esri

Photograph



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Page 2 of 2

Franknology

Machine Name: Orbit M ECT888A Location: ET888A Qty: FLORENCE (Rev: 08, Zip: 97439)

PUMP BUMP TESTING

Medical Developer By: ☐ Tech Manufacturer ☐ Industry Standard ☒ Professional Engineer
 Medical Used By: ☐ OEM ☐ PFD ☒ NP ☐ CDS ☐ Vascular ☒ Hypertonic

Medical Used For: ☐ Pressure ☐ Other (Specify): ☐ Vacuum

Test Equipment Used: NACON Equipment Description: 0.00027 In. Test Date: 9/7/2024

Pump Diameter: Pump Depth: Pump Material: Bottom of the pump is the highest electrical penetration (in extended range). Condition of pump prior to testing: Position of Pump Tester: Does bubble shut down when sensor detects liquid (both product and water)? Turbine vibration response time to warning programmed for full scale excursion? Were full scale verified to be operational? Total time between applying pressure/intermediate and starting test. Test Start Time: Initial Reading (Psi): Test End Time: Final Reading (Psi): Test Duration: Change in Reading (Psi, Δ): Pass/Fail Threshold or Criteria: Test Result: Was sensor exposed for testing? Was sensor properly replaced and verified functional after testing?	0.075 Conductor for Test To (Pressure: 1) Polyethylene Good 4 in above highest penetration NA NA NA 8 min 11:58 1.30070 12.11 3.94950 15 min -4.30420 +/- 0.00200 Fail Yes NA
--	---

Comments: — Include information on repair made prior to testing and recommended follow-up for failed tests

Technician Name: Kevin Egle Test Date: 9/7/2024
 Technician Signature: [Signature] Certification #: _____
 WO 191614

Page 1 of 3

Tankology

Customer Name: Chick K RT2044K Location: P: 07044K City: FLORENCE Date: 06/20/2016

PIPING PUMP TESTING

Installed By: ☒ Tank Manufacturer ☐ Other (Specify) _____	Industry Standard: ☐ ASME B31.3 ☒ Other (Specify) _____	Professional Engineer: ☐ _____ ☒ Registered Professional Engineer
Test Method Used By: ☐ ASME B31.3 ☒ Other (Specify) _____	Test Method: ☐ ASME B31.3 ☒ Other (Specify) _____	Test Method: ☐ ASME B31.3 ☒ Other (Specify) _____

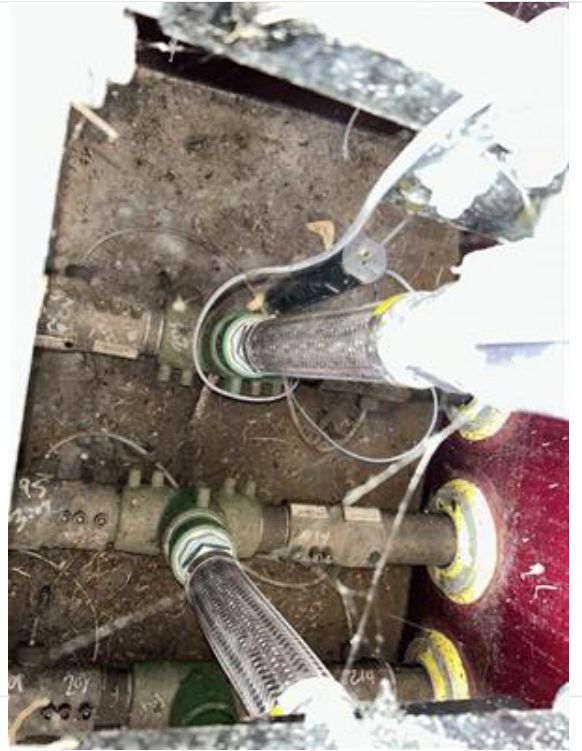
Test Equipment Used: INCON Equipment Resolution: 0.00001 in. Test Date: 07/05/2016

Test Equipment Used: <u>INCON</u>	Equipment Resolution: <u>0.00001 in.</u>	Test Date: <u>07/05/2016</u>
Pump Orientation: <u>STP Containment for Tank T2</u> <u>UNDESIGNED - 1</u>	STP Containment for Tank T2 <u>UNDESIGNED - 1</u>	STP Containment for Tank T2 <u>FLUB - 1</u>
Pump Depth: _____	_____	_____
Pump Material: <u>Polystyrene</u>	Polystyrene	Polystyrene
Bottom of the pump to the highest product penetration: _____	_____	_____
Bottom of the pump to the highest electrical penetration (or without steam): _____	_____	_____
Condition of pump prior to testing: _____	Good	Good
Purpose of Pump Testing: _____	4 in above highest penetration	4 in above highest penetration
Does system shut down when pump sensor detects leak (both product and water)? _____	4 in above highest penetration	4 in above highest penetration
Turbine shut down - regular time _____	_____	_____
Is system programmed for full scale shutdown? _____	_____	_____
Have full scale verified to be operational? _____	_____	_____
What time between applying pressure/reducer and starting test _____	0 min	0 min
Test Start Time: _____	11:11	11:11
Initial Reading (Psi) _____	4.80100 in.	2.00000 in.
Test End Time: _____	11:26	12:11
Final Reading (Psi) _____	4.80100 in.	2.00000 in.
Test Duration: _____	15 min	15 min
Change in Reading (Psi/R) _____	0.00000 in.	0.00000 in.
Pass/Fail Permitted or Critical _____	<= 0.00000	<= 0.00000
Test Result: _____	Pass	Pass
Was sensor removed for testing? _____	Yes	Yes
Was sensor properly replaced and verified functional after testing? _____	NA	NA

Comments - Include information on repairs made prior to testing, and recommended follow-up for failed tests

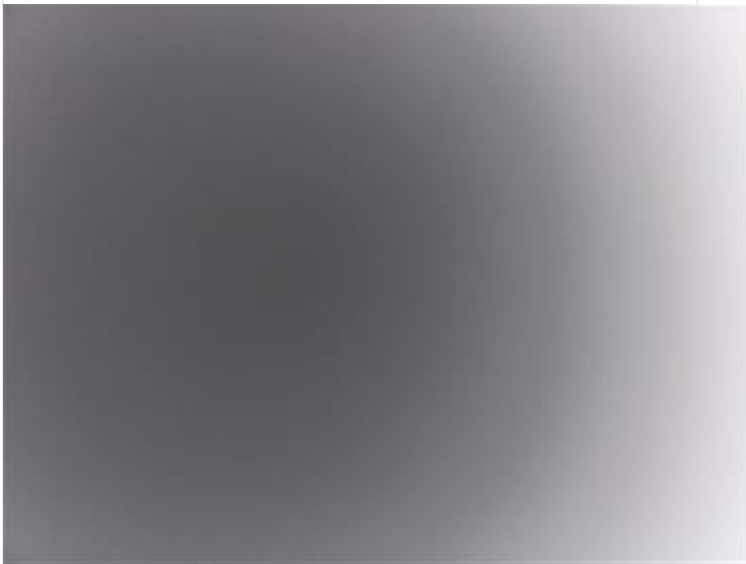
Technician Name: _____
 Technician Signature: [Signature]
 Date: 07/05/2016
 Test Date: _____
 Certification #: _____

[illegible][illegible]



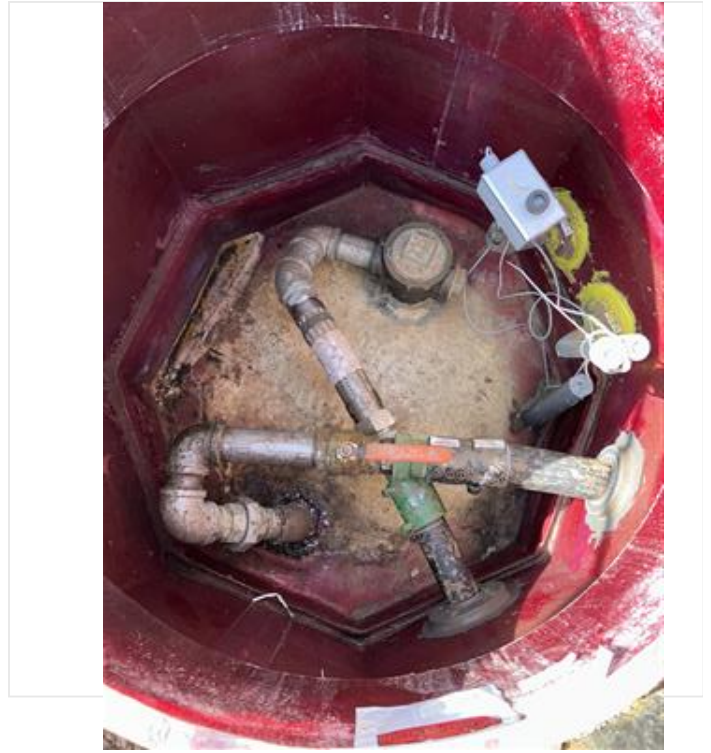
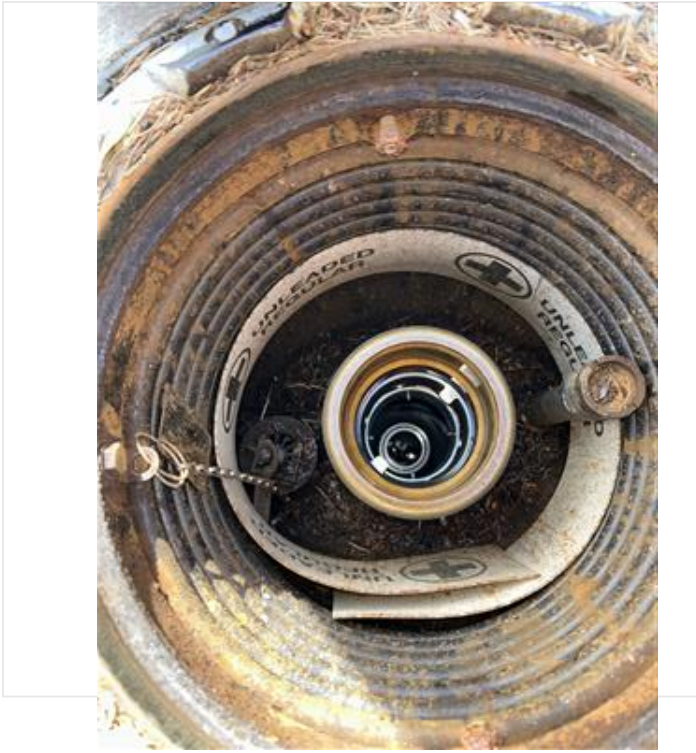
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State of Oregon
Department of
Environmental
Quality

Program Enforcement No. 2025-FC-9923

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:	06/04/2025	Facility ID#:	713
Inspector:	Diana Foss	Facility Name:	CIRCLE K #9644
DEQ Office:	DEQ Headquarters, Land Quality Division 700 NE Multnomah Street, Suite 600	Facility Address:	951 Hwy 101, FLORENCE, Oregon 97439
Phone #:	503-869-0770	County:	Lane

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 Mail	☐ Both	Date Issued: 06/09/2025
Facility Representative Present During Inspection:	☐ Permittee ☐ Owner ☐ Other			
Name of Permittee or Owner:	Circle K Stores, Inc.			
Mailing Address:	255 E Rincon St Ste 100 , Corona California 92879			
Field Citation Penalty – See Page 3 for detailed listing of each violation.				\$ 750

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:

07/07/2025

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.

Department of Environmental Quality (DEQ) Underground Storage Tank Program
UST FIELD CITATION

Facility Representative initials: _____

DATE ISSUED: 06/09/2025

PROGRAM ENFORCEMENT No.: 2025-FC-9923

FACILITY ID: 713

Page 3 of 3

Violation #1:	Failure to conduct one of the 3-year corrosion protection tests within the last six years.		
*TCR:			
Corrective Action:	Submit passing CP test		
Rule Citation: OAR 340-150-0325(2)(b)	Penalty Amount: \$ 300	Correct Violation by: 07/07/2025	Date Violation Corrected:
Violation #2:	Failure to operate or maintain a method or combination of methods for release detection such that the method can detect a release from any portion of the UST system.		
*TCR:			
Corrective Action:	Submit photographic proof that the liquid has been removed from the STP sumps and all sensors are positioned in the lowest part of the sumps. Submit photographic proof that the interstitial opening in the diesel STP sump is open. Submit photographic proof that the interstitial opening in UDC 7/8 is open		
Rule Citation: OAR 340-150-0400(1)(c)	Penalty Amount: \$ 300	Correct Violation by: 07/07/2025	Date Violation Corrected:
Violation #3:	Failure to allow access at reasonable time to interview persons, inspect equipment and site conditions, collect samples, take still or video pictures, conduct an investigation or review and copy records.		
*TCR:			
Corrective Action:	No further corrective action		
Rule Citation: OAR 340-150-0135 (2)	Penalty Amount: \$ 150	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 600		
	(This Page): \$		

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

RETURN THIS FORM TO THE DEQ INSPECTOR LISTED ON PAGE 1 ON OR BEFORE: _____ 07/07/2025 _____

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

Technician: Tyler Hardy
Technician Certification: (See forms)



Subcontracted Services

Page 1 of 1

Site Name & ID #: Circle K #2709644 - 2709644

Address: 951 Highway 101 P.O. Box 1832

City, State, Zip: FLORENCE, OR 97439

Phone #: 541-997-4125

WO #: 2385686

Test Date: 6/22/2025

Subcontractor Name:

Address:

City, State, Zip:

Phone #:

Tanknology Contact:

	Tank Tank-2 Regular	Tank Tank-3 Mid Grade	Tank Tank Premium	Tank	Tank	Tank	Tank	Tank
Product	UNLEADED	MIDGRADE	PREMIUM					
Tank Size	6259	8048	8048					
Tank Tightness Test								
Line Tightness Test								
Leak Detector Test								
Spill Bucket Leak Test								
Stage I Pressure Decay								
Tank Interstitial								
Line Interstitial								
Turbine Sump Test								
Fill Sump								
Static Torque								
Drop Tube Integrity								
Tank Cathodic Protection	P	P	P					
Line Cathodic Protection								

ATG Certification		Stage II Pressure Decay		Healy Quarterly Inspection	
Impact Valve		Vapour Tie		Rule 461 Insp.	
E-Stop		Air or Vapour /Liquid		Overfill Survey	
6-Click Test		Dry DBP		Regulatory Annual Inspn.	
10 Gallon / Min		Wet DBP		Regulatory Quarterly Inspn.	
MD Helium Pinpoint		Flow Rate		Regulatory Monthly Inspn.	
Continuity		Liquid Removal		Customer Annual Inspn.	
Disp. Sump Test		Healy Bag Test		Customer Quarterly Inspn	
Vent / Vapour Interstitial		Healy Line Integrity		Customer Monthly Inspn	
Other Sump Test		Healy Clean Air Separator		Rhode Island Mon Well	
Other Sump Test		ISD (Exhibit 9)		Tank Tilt Survey	
Cathodic Protection Survey	P	Healy Boot Test		Tank Diameter Measurement	
Rectifier Check		Pressure Vent Cap		Stage I Survey	
3-6 Mo. Follow Up CP Needed				Subcontracted Maintenance	
Flex Cathodic Protection					

Other Tests and Comments (these comments may need to be added to the main comments screen so the customers can view them)

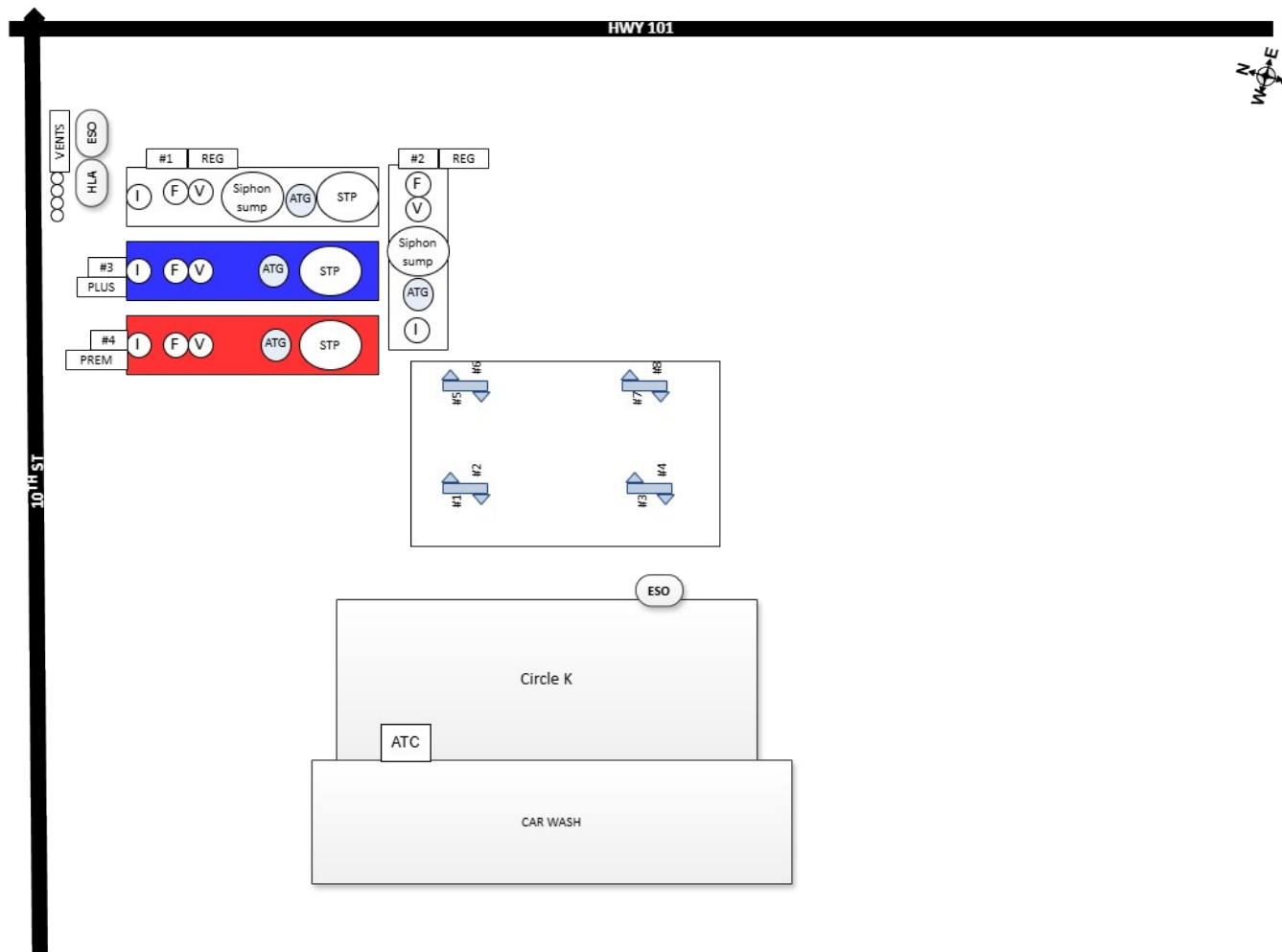
CP Testing on tanks #2-4 passes. Tank #1 is clad and does not require CP testing.



Site Diagram

(This site diagram is for reference only and is not drawn to scale)

Work Order: 2385686
Site ID / Name: 2709644 / Circle K #2709644
Address: 951 Highway 101 P.O. Box 1832
City: FLORENCE State: OR Zip: 97439



Site Map

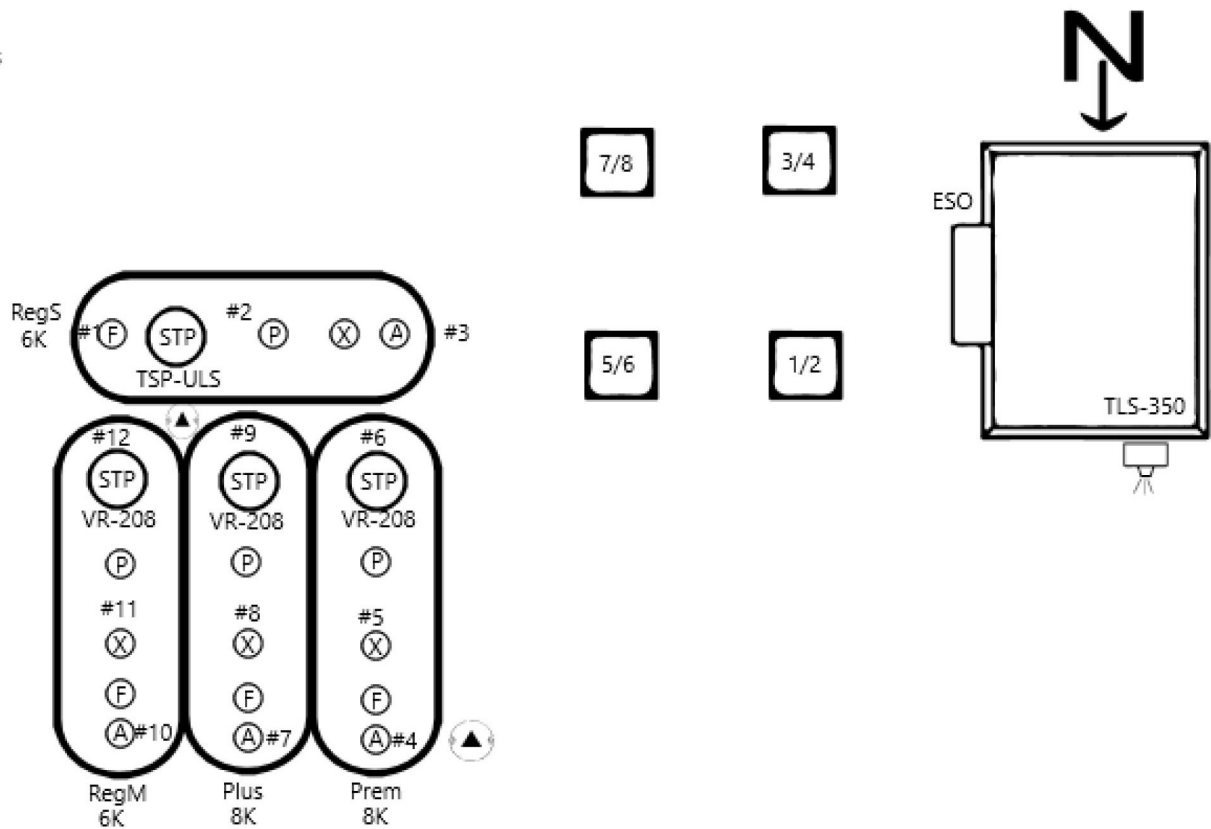
Customer Name: Circle K Stores Inc **Site Name:** 2709644

Site Address: 951 Highway 101, Florence

Job Number: 128906

Facility ID:

VR-420
All Annulars



Galvanic Cathodic Protection Evaluation

I. UST Facility	II. UST Owner
Facility Compliance Tag#: UBI#: N/A Facility Name: 2709644 Address: 951 Highway 101 City: Florence County: Lane State: OR ZIP Code: 97439-7648 Phone: (602) 728-8000 Ext 7233	Name: Circle K Stores Inc Address: 255 E Rincon St., Suite 100 City: Corona State: CA Phone: 951-270-5108
	III. CP Tester
	Tester's Name: Tyler Hardy Company Name: Northwest Tank & Environmental Services, Inc. Address: 11000 N. MoPac Expy City: Suite 500 State: Austin TX Phone: (800) 742-9620 Certification Type: STI Cathodic Protection ICBO U4
IV. Cathodic Protection Tester's Evaluation	
Pass	Criteria that are used to determine that cathodic protection is adequate as required by the Washington State Underground Storage Tank Regulations shall be in accordance with a code of practice developed by a nationally recognized association (i.e. NACE)
CP Tester's Signature: 	Date CP Survey Performed: 06/22/2025
V. Retrofit or Repair Design	
All retrofitting or repairs to CP systems shall be designed by a corrosion expert. Attach a copy of both the design of the retrofit or repair, and a copy of the Underground Storage Tank Retrofit and Repair checklist. All UST systems that have undergone a retrofit or repair shall be tested when they are installed, and again within one and six months of installation.	
CP Experts Name: Tyler Hardy Nationally Recognized Organization: Corrosion Expert's Signature:	Company: Tanknology Certification Number: 8176958 Date: 3/20/2027
VI. Criteria Applicable to Evaluation	
Continuity Survey: COMPLETE	All USTs must show continuity using an approved testing method
Neg. 850 On Tanks: N/A , Components: 3 Piping: N/A, Components: N/A Other: N/A, Components: N/A	A negative (cathodic) potential of at least -850 mV with the cathodic protection applied. This potential is with respect to a saturated copper-copper sulfate reference electrode containing electrolyte.
850 Instant Off Tanks: N/A , Components: N/A Piping: Pass, Components: 1 Other: N/A , Components: N/A	A negative polarized potential of at least -850 mV relative to a saturated copper-copper sulfate reference electrode (Instant Off Potential)
100 mV Pol. Tanks: N/A, Components: N/A Piping: N/A, Components: N/A Other: N/A , Components: N/A	A minimum of 100 mV cathodic polarization between the structure surface and a stable reference electrode contacting the electrolyte.
VII. Action Required as a Result of this Evaluation	
None: Pass	

Remarks: (Include type of gear ex: Multimeter, Interruptor Cycle):

Galvanic Cathodic Protection System Continuity Survey							
Structure "A"	Structure "B"	Point "A" to Point "B" or Fixed Cell Location > 30'	Structure "A" Fixed Voltage - > 30'	Structure "B" Fixed Voltage - > 30'	Point to Point or Fixed Voltage Difference	Continuous or Isolated	Method and Standard Used (e.g. RP -0285, R051)
1 (Tank)	2 (Tank)				634	Isolated	Pt to Pt RP-0285
2 (Tank)	3 (Tank)				2	Continuous	Pt to Pt RP-0285
2 (Tank)	4 (Tank)				2	Continuous	Pt to Pt RP-0285

Galvanic Cathodic Protection System Survey									
Structure	Contact Point	Half Cell Location	Local Voltage (On)	Remote Voltage (On)	Local Voltage (Instant Off)	Local Voltage (Depolarized)	Voltage Change	Pass or Fail	Method and Standard Used (e.g. RP -0285, R051)
2 (Tank)	Inside of Tank	4	-1098	R1-1018,R2-1057				Pass	-850 on R051
2 (Tank)	Inside of Tank	5	-1144					Pass	-850 on R051
2 (Tank)	Inside of Tank	6	-1080					Pass	-850 on R051
3 (Tank)	Inside of Tank	7	-1035	R1-1000,R2-1014				Pass	-850 on R051
3 (Tank)	Inside of Tank	8	-1054					Pass	-850 on R051
3 (Tank)	Inside of Tank	9	-1088					Pass	-850 on R051
4 (Tank)	Inside of Tank	10	-925	R1-944,R2-994				Pass	-850 on R051
4 (Tank)	Inside of Tank	11	-986					Pass	-850 on R051
4 (Tank)	Inside of Tank	12	-994					Pass	-850 on R051

	Tanknology Inc. 11000 N. MoPac Expressway, Suite 500 Austin, TX 78759 (800) 964-0010 JOB CLEARANCE FORM & SITE SAFETY CHECKLIST - OVF	Policy 100-29-A Rev: H Revised: 6/25/2022
---	---	---

Site Name/ID: Circle K 2709644	Street Address: 951 Hwy 101	W.O. # 2385686
Arrival Time: 9:45 am	Departure Time:	Travel Time:
Others on site:		Date: 6/22/25

Scope of Work and Tasks Performed (JSA's must be available for all tasks):

CP

Repairs to Equipment or Parts Provided:

Follow-up actions required, equipment isolated, comments:

PPE - PERSONAL PROTECTIVE EQUIPMENT REQUIRED (Check ✓ items used or mark ~ if not applicable)

☒ Safety Vest/Shirt (all jobs)	☒ Gloves (all jobs)	☐ Splash Goggles (if needed)	☐ Hearing Protection (if needed)
☒ Safety Toe Boots (all jobs)	☒ Safety Glasses (all jobs)	☐ Hard Hat (if needed)	☐ Other

✓ PRE-TEST PROCEDURES (Check ✓ each item completed or mark ~ if not applicable)

1. ☒ Discuss safety procedures with site personnel. Nearest hospital: _____
2. ☒ Get ATG printout & check fuel/water levels. Prior to fuel delivery the system must be placed back into working order.
3. ☒ Barricade work area (cones, flags, bars/tape) and place Fire Extinguishers & "No Smoking" Signs at perimeter.
4. ☒ Confined Space Entry – If required complete separate CSE Checklist. If NO CSE check the following reason:
☐ No CS's ☐ CS's not opened ☐ No entry only visual ☐ No entry - used tools ☐ Work from prone position w/o risk of falling in
5. ☒ Implement Lockout/Tagout per API 1646 (when accessing product piping during tasks)
 - ☐ Secure nozzles with "Out of Service" bags and nylon ties.
 - ☐ Secure the circuit breaker(s) with lockout devices and tags.
 - ☐ Close ball valves or check valves on product piping.
 - ☐ Disconnect electrical "bayonet" connector from the STP(s).
 - ☐ All applicable equipment disabled during test(s).
 - ☐ Verify LOTO is complete by trying to operate pumps.

SIGN IN

General Safety Checks:

All site personnel have been informed.
 Is a fuel delivery due today? _____
 LOTO procedures have been discussed.
 Work areas barricaded to protect workers, staff & public.

Lead Technician Name

Tyler Hardy

Lead Technician Signature

[Signature]

Site Representative Name

Kayleigh Herring

Site Representative Signature

[Signature]

✓ POST-TEST PROCEDURES (Check ✓ each item completed or mark ~ if not applicable)

1. ☒ Remove all "Lockout/Tagout" devices and nozzle bags/ties.
2. ☒ Run all pumps and verify there are no leaks:
 - ☐ Leak Detector & Vent Tubes
 - ☐ Impact Valve Test Ports under dispensers
 - ☐ STP Functional Elements & Relief Screws
3. ☒ Get ATG printout. Confirm water levels same as start or explain difference: _____
4. ☒ Check following components operational:
 - ☒ ATG probes, sensors, & caps
 - ☒ Ball floats, dry breaks & caps
 - ☒ Containment sumps are dry
 - ☒ Manhole covers and sump lids
 - ☒ Spill containers & drain valves
 - ☒ Drop tubes, flapper valves, fill adapters & caps
 - ☒ Shear valves are open
 - ☒ Dispensers & POS operational
 - ☒ Dispenser panels are replaced
 - ☒ Vents & Extractors (not capped, plugged or isolated)
 - ☒ Cathodic protection operational
 - ☒ Siphon lines and manifold valves open
5. ☒ Remove barricades.

SIGN OUT & Operator Verification of Work (OVF)

General Safety Checks:

Work area has been left clean & safe.
 Site staff aware of work status including any remaining isolation.
 Changes to equipment are documented and communicated.
 All incidents, near incidents, and unsafe situations reported.

Lead Technician Name

Tyler Hardy

Lead Technician Signature

[Signature]

Site Representative Name

Jacob Merrill

Site Representative Signature

[Signature]

Site Representative Comments:

Foxtrot Construction Inc

+13104907737
fermin@foxtco.com
www.foxtco.com



INVOICE

BILL TO

Circle K
Circle K
255 E Rincon St
Corona, CA 92879

SHIP TO

Circle K
Circle K
255 E Rincon St
Corona, CA 92879

INVOICE # 41315**DATE** 06/27/2025**DUE DATE** 07/27/2025**TERMS** Net 30**TRACKING NO.**

FP-38414

JOB SITE

2709644 - Florence

PURCHASE ORDER

FWKD5656574

DEPARTMENT

Fueling

ACTIVITY	QTY	RATE	AMOUNT
Fueling-Labor 06/27/2025	2	70.00	140.00

Description of Problem:- Liquid sensor

Details of Work Completed:- Arrived to site for liquid sensor not working continued to speak with manager to find out which sensor was not working we continued to find the paper work and speak with Reyna she wanted 7/8 udc sensor looked at and verify it was going into alarm she also wanted all sump sensors tested and verify they are in the lowest point of the sump. Continued to test all udc sensor and sump sensors some sumps an but of liquid in them but in total I removed about five gallons of water out of all of them. Continued to verify all sensor are sending an alarm to the veeder root a few sump sensors had to be moved to the lowest. Verified all liquid sensors are sending an alarm when flipped job is complete.

Fueling-Travel Time	1	85.00	85.00
----------------------------	---	-------	-------

Circle K
951 Highway 101
Florence, OR 97439

SUBTOTAL	225.00
TAX	0.00
TOTAL	225.00
BALANCE DUE	\$225.00



1:



2:



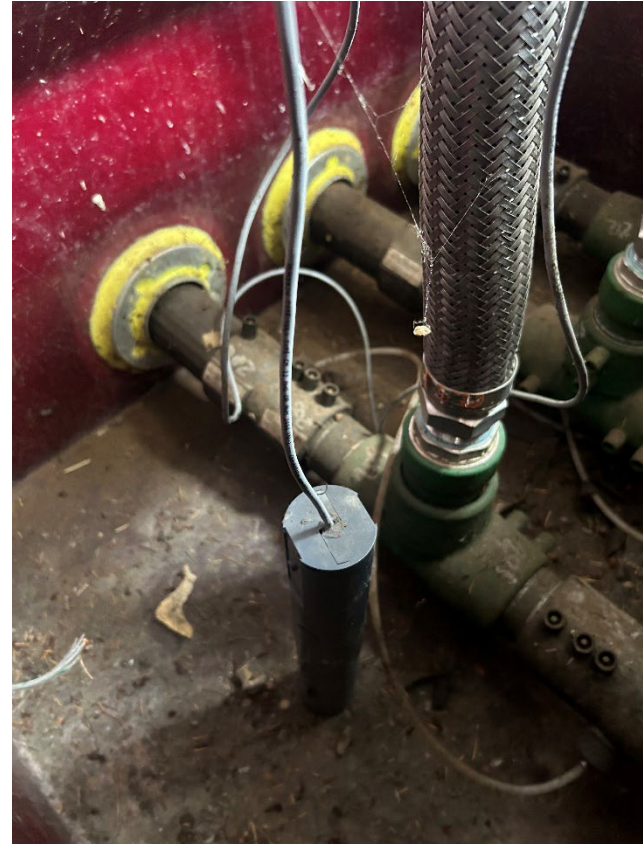
3:



4:



5:



6:



7:



1:



2:



3:



4:



5:

RE: UST Inspection Circle K #9644 6/5/25 9:30 am

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

Date Mon 9/15/2025 11:04 AM

To LITKE Emily * DEQ <Emily.Litke@deq.oregon.gov>

Yes, sorry I didn't communicate that to you.

I did update the corrective action in YDO. I think we need to figure out a way to use that information in tracking.



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

Sent: Monday, September 15, 2025 10:59 AM

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

Subject: Fw: UST Inspection Circle K #9644 6/5/25 9:30 am

Hey Diana,

Do you have insight for Circle K #9644 in Florence. Did they send you CP records? I show that they are still missing.

Emily

From: Gomez, Jesenia <jesenia.gomez@circlek.com>

Sent: Monday, September 15, 2025 7:39 AM

To: LITKE Emily * DEQ <emily.litke@deq.oregon.gov>

Cc: UST Duty Officer * DEQ <ust.dutyofficer@deq.oregon.gov>; West Coast Environmental <WC-ESS@circlek.com>; 2709644 Store Mailbox <2709644@circlek.com>; Fricke, Linda <linda.fricke@circlek.com>

Subject: RE: UST Inspection Circle K #9644 6/5/25 9:30 am

Good Morning Emily,

We received in an email stating violation #1 regarding CP testing was still open, please see email below and email attached. Thank you!

**NATIONAL FUEL DAY – Please DO NOT SCHEDULE
TESTING/INSPECTIONS/REPAIRS ON AUGUST 28TH, 2025**

**Please send any/all resultant paperwork to Operational Excellence
(businessexecution@circlek.com) within 24 hours of receipt and file the same
appropriately in your environmental binder.**

Thank you,
Jesenia Gomez

**West Coast Environmental Compliance Specialist
Environmental Shared Services**

C: 623-755-4464 | Email: Jesenia.gomez@circlek.com & WC-ESS@circlek.com



Part of Alimentation Couche-Tard

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From: 2709644 Store Mailbox <2709644@circlek.com>
Sent: Friday, September 12, 2025 11:36 AM
To: Business Execution <businessexecution@circlek.com>
Cc: Fricke, Linda <linda.fricke@circlek.com>; Van Slyck, Richard <rvanslyc@CircleK.com>
Subject: Fw: UST Inspection Circle K #9644 6/5/25 9:30 am

Jessica Rochelle
Store Manager
Circle K - West Coast Division

e: str09644@circlek.com
t. (541) 997-4125

Circle K #2709644
951 HWY 101
Florence, OR 97439

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

Sent: Friday, September 12, 2025 11:00 AM

To: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>; Mendez, Reyna <rmendez@circlek.com>;
2709644 Store Mailbox <2709644@circlek.com>

Subject: Re: UST Inspection Circle K #9644 6/5/25 9:30 am

CAUTION: This email originated from outside Circle K. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

UST Facility 713 Circle K #9644 located at 951 Hwy 101, FLORENCE, Oregon 97439

Please provide an update on the payment of the \$750 penalty and a passing cathodic protection test.

Violation #1 still needs to be addressed, I understand that CP testing can take a while to get scheduled.

Corrective Actions (email documentation for each requested item)

Violation #1 – submit passing CP test

Violation #2 –

1. ~~Submit photographic proof that the liquid has been removed from the STP sumps and all sensors are positioned in the lowest part of the sumps. COMPLETE~~
2. ~~Submit photographic proof that the interstitial opening in the diesel STP sump is open. COMPLETE~~
3. ~~Submit photographic proof that the interstitial opening in UDC 7/8 is open. COMPLETE~~



Emily Litke (she/her)

Duty Officer, Underground Storage Tanks

DEQ Headquarters, Land Quality Division

700 NE Multnomah Street, Suite 600

Portland OR 97232-4100

503-806-9516

Emily.LITKE@deq.oregon.gov

From: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>
Sent: Wednesday, July 9, 2025 1:01 PM
To: rmendez@circlek.com <rmendez@circlek.com>; 2709644@circlek.com <2709644@circlek.com>
Cc: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>
Subject: RE: UST Inspection Circle K #9644 6/5/25 9:30 am

Good afternoon,

UST Facility 713 Circle K #9644 located at 951 Hwy 101, FLORENCE, Oregon 97439

Please provide an update on the payment of the \$750 penalty and documentation for the corrective actions.

Corrective Actions (email documentation for each requested item)

Violation #1 – submit passing CP test

Violation #2 –

1. Submit photographic proof that the liquid has been removed from the STP sumps and all sensors are positioned in the lowest part of the sumps.
2. Submit photographic proof that the interstitial opening in the diesel STP sump is open.
3. Submit photographic proof that the interstitial opening in UDC 7/8 is open



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: Mendez, Reyna <rmendez@circlek.com>

Sent: Thursday, June 5, 2025 6:34 PM

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

Cc: 2709644 Store Mailbox <2709644@circlek.com>; GILBERT Blakely * DEQ <Blakely.GILBERT@deq.oregon.gov>

Subject: Re: UST Inspection Circle K #9644 6/5/25 9:30 am

Hello Diana,

I will have vendors out on site by tomorrow to survey and get working on repairs immediately to bring out site back into compliance. I will keep you posted with any progress. Thank you.

Thank you,

Reyna Mendez

West Coast Environmental Compliance Specialist

North American Environmental Shared Services

P: 602_728_8000 ext.7233

F: 602_307_7437

Email: rmendez@circlek.com & ess-westcoast@circlek.com

Part of Alimentation Couche-Tard

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

Sent: Thursday, June 5, 2025 4:00:43 PM

To: Mendez, Reyna <rmendez@circlek.com>

Cc: 2709644 Store Mailbox <2709644@circlek.com>; GILBERT Blakely * DEQ <Blakely.GILBERT@deq.oregon.gov>

Subject: RE: UST Inspection Circle K #9644 6/5/25 9:30 am

CAUTION: This email originated from outside Circle K. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi, Reyna,

Nate from Tanknology was great this morning, and the store staff were super helpful.

I told the manager that, now that you're doing interstitial monitoring, she doesn't have to run tank leak detection tests every month; the sensor output is fine. Similarly, you don't have to do line tightness tests anymore, although you certainly can if you want to.

As I specify below, I saw no evidence of any overfill testing at this site. According to Oregon Administrative Rule OAR 340-150-0163(3):

The permittee may not operate an UST that does not meet the conditions and requirements of the operation certificate and all other applicable rules and statutes. The permittee must:

- a. Immediately take all actions necessary to bring the UST system into compliance; or
- b. Submit a 30-day notice of permanent closure to the department and immediately begin to manage the UST system in compliance with the conditions and requirements of a general permit for permanent closure in accordance with OAR 340-150-0166 or 340-150-0168.

Attached to this email, you will find a temporary closure certificate. This supersedes your operating certificate, effective immediately. Your facility has been placed on the Do Not Deliver List on DEQ's website, and you may not receive fuel deliveries while your tank(s) are in temporary closure. Please remove the operating certificate from where you have it posted.

I observed the following compliance issues this morning.

1. The sensors in the sumps were not in the lowest parts of the sumps



Three of your STP sumps had liquid in them, and the sensors were all placed away from where the liquid was collecting.

2. The interstitial opening in the diesel STP sump piping was closed.
3. The interstitial port in the 7/8 UDC was closed
4. You had no annual testing for 2023 (line leak detectors, ATG certification, annual walkthrough)
5. You had no CP testing for 2022
6. You had no overfill testing at all
7. You had no spill bucket testing performed prior to 10/1/2020
8. The spill bucket testing results from 2024 did not include all 4 buckets for the actual tank fill. There were 2 UST spill buckets and one vapor bucket tested.
9. The containment sump testing you had from 2024 showed hydro tests that were not performed according to a nationally-recognized code of practice

The corrective actions for these violations are due July 7, 2025.

- 1) Submit photographic proof that the liquid has been removed from the STP sumps and all sensors are positioned in the lowest part of the sumps
- 2) Submit photographic proof that the interstitial opening in the diesel STP sump is open
- 3) Submit photographic proof that the interstitial opening in UDC 7/8 is open
- 5) Submit a passing CP test
- 6) Submit a passing overfill test that includes measurements to support the determination. I've attached a test document to use
- 8) Submit passing hydrostatic tests for all of your non-vapor spill buckets that follow a nationally-recognized code of practice such as the PEI RP-1200
- 9) Submit passing hydrostatic tests for all of your containment sumps that follow a nationally-recognized code of practice such as the PEI RP-1200

These violations are being referred to DEQ's Office of Compliance Enforcement for formal enforcement action. An Environmental Law Specialist will contact you when this case comes up.

Thank you for your prompt action to bring your facility back into compliance. Please let me know if you have any questions.



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

Sent: Monday, May 19, 2025 9:40 AM

To: Mendez, Reyna <rmendez@circlek.com>

Subject: UST Inspection Circle K #9644 6/5/25 9:30 am

Hi, Reyna,

Thank you for speaking with me this morning. I will be inspecting your UST facility in Florence, OR on 6/5/2025 at approximately 9:30 am. Attached is an inspection notification letter with the details.

The number below is my cell, in case anyone needs to contact me the day of the inspection.

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

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Fee	–	Paid	=	Due
\$ 750.00		\$ 750.00		\$ 0.00

Penalty

▶ 2025-FC-9923

UST - Field Citation

\$ 750.00

1 Results

⊕ Add Penalty

 Send to FIMS

Payment

▼ Check by Mail 10795633

9/29/2025

55792

\$ 750.00

Type

Amount

Check by Mail

750

E-Payment Confirmation#

E-Payment Settle Date

Ref#

Payment Date

55792

09/29/2025

Comments

2025-FC-9923

(Remaining Length: 3988)

Site Info

CIRCLE K #9644



951 Hwy 101, FLORENCE, OR 97439

81387 ✓

297434

CEM_FacilityIdentifier=18424 UST (713)

Stationary

Inspection Info

7988 Completed

UST

 Full Compliance Inspection (FCI) TCR only

	Start Date	6/4/2025	End Date	6/6/2025
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Created & Updated Info