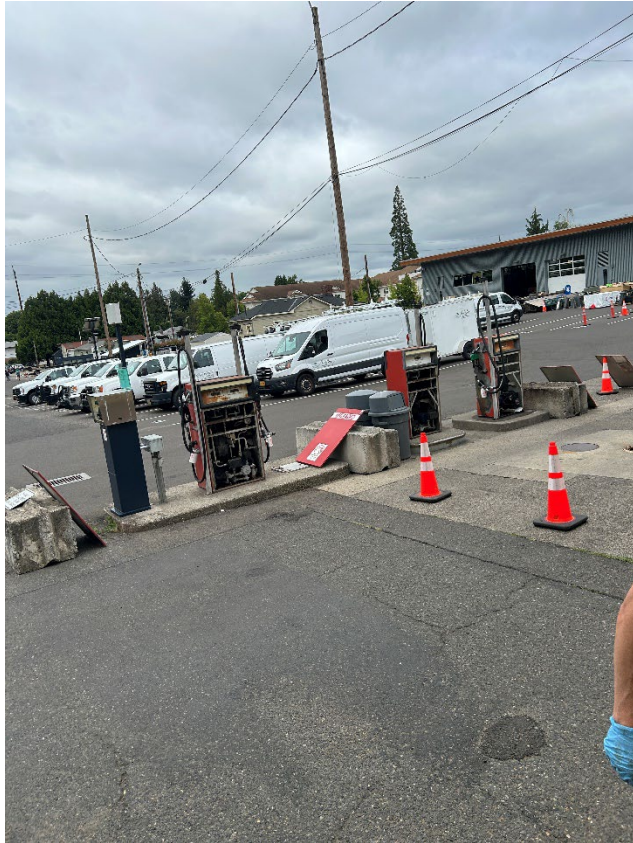




INSPECTION PHOTOLOG

INSPECTION DATE: August 14, 2025



1: 6437 SE Division St, Portland, OR 97206



2: Impressed current rectifier



INSPECTION PHOTOLOG

INSPECTION DATE: August 14, 2025



3: Rectifier information tag

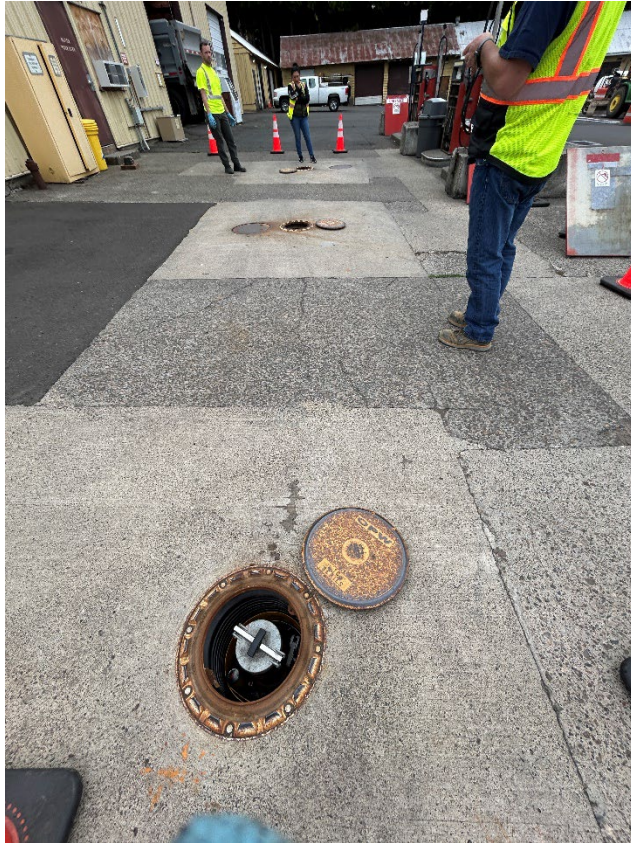


4: Diesel fill

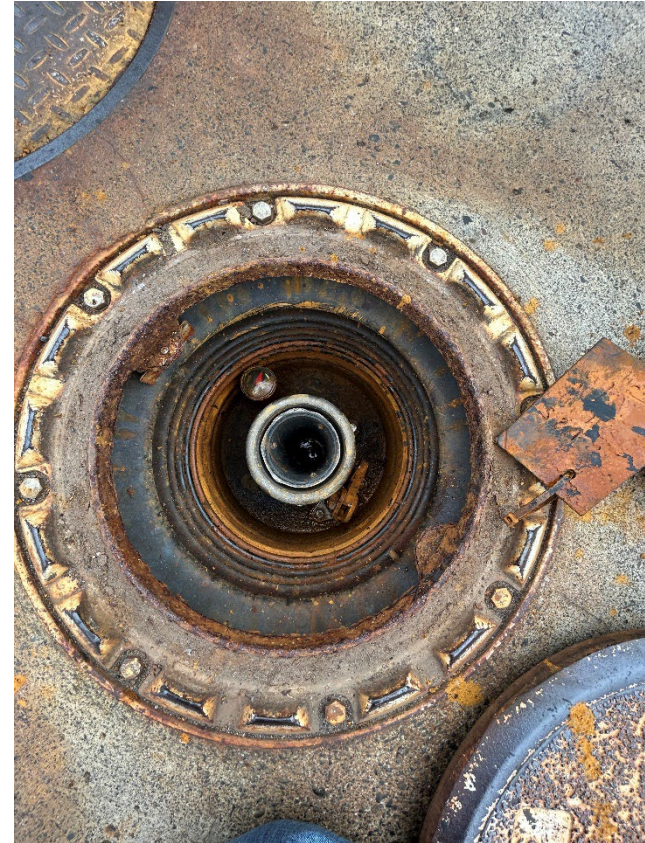


INSPECTION PHOTOLOG

INSPECTION DATE: August 14, 2025



5: Tank nest area looking east



6: Regular fill



INSPECTION PHOTOLOG

INSPECTION DATE: August 14, 2025



7: 10,00 gallon regular fill



8: UDC #1/2



9: Safe suction system pulley



10: UDC #3/4



11: UDC #3/4



12: Emergency shut-off and overfill alarm



13: Annual sensor



State of Oregon
Department of
Environmental
Quality

Program Enforcement No. 2025-FC-9977

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: | 08/13/2025 | Facility ID#: | 4646 |
| Inspector: | Ingrid GAFFNEY | Facility Name: | Portland City of Vehicle Svcs Div Garage |
| DEQ Office: | 700 NE Multnomah St Ste 600 | Facility Address: | 6437 SE DIVISION ST, PORTLAND, Oregon 97206 |
| Phone #: | 503-229-5048 | County: | Multnomah |

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

| | | | | |
|---|--|--|-------------------------------|--|
| Field Citation Issued: | <input type="checkbox"/> In Person | <input checked="" type="checkbox"/> By Email | <input type="checkbox"/> Both | Date Issued: 08/22/2025 |
| Facility Representative Present During Inspection: | Lei Peralta | | | <input type="checkbox"/> Permittee <input type="checkbox"/> Owner <input type="checkbox"/> Other |
| Name of Permittee or Owner: | City of Portland | | | |
| Mailing Address: | 2835 N Kerby Ave , Portland Oregon 97227 | | | |
| Field Citation Penalty – See Page 3 for detailed listing of each violation. | | | | \$ 150 |

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:

09/22/2025

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: 08/22/2025

PROGRAM ENFORCEMENT No.: 2025-FC-9977

FACILITY ID: 4646

Page 3 of 3

| | | | |
|--|---|----------------------------------|---------------------------|
| Violation #1: | Failure to conduct the most recent 3-year corrosion protection test. | | |
| *TCR: | | | |
| Corrective Action: | Complete cathodic protection testing of the impressed current system within 60 days. Maintain records and submit compliance testing results to DEQ by October 22nd , 2025 | | |
| Rule Citation: OAR 340-150-0325(2)(b) | Penalty Amount: \$ 150 | Correct Violation by: 10/22/2025 | Date Violation Corrected: |
| Violation #2: | | | |
| *TCR: | | | |
| Corrective Action: | | | |
| Rule Citation: OAR | Penalty Amount: \$ | Correct Violation by: | 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: |
| | <div style="background-color: yellow; padding: 5px;"> Total Penalty Amount 150 (This Page): \$ </div> | | |

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: 09/22/2025

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

Oregon Department of Environmental Quality

Cathodic Protection Test Information Page

| UST Owner | | UST Facility | |
|---|-----------------|---|-----------------------------|
| Name: | | Name City of Portland | Facility ID#: 130428 |
| Address: | | Address: 6437 SE Division St | |
| City: | State | City: Portland | |
| Cathodic Protection Tester | | | |
| UST Supervisor Name Michael Driggs | | Oregon UST Supervisor license# 27762 | |
| UST Service Provider NWTLI | | Exp. Date: 1/21/2027 | |
| Address: PO Box 883 | | Phone: 4159978034 | |
| City: Sherwood | State OR | NACE Cert. #: ICC 8041100 | |
| Cathodic protection system is: (check ✓ one) [] Galvanic [x] Impressed current Date Last Tested: 2/2/2022 | | | |
| Weather Conditions at Time of Testing/Inspection: sunny, clear | | | |
| Temperature: 85f Soil/Backfill Conditions (check ✓): <input type="checkbox"/> moist <input checked="" type="checkbox"/> dry <input type="checkbox"/> sand <input type="checkbox"/> gravel <input type="checkbox"/> soil Describe soil: | | | |
| Cathodic Protection System Certification | | | |
| <input type="checkbox"/> Test required within 6 months of installation of CP system (installation date was _____) | | | |
| <input checked="" type="checkbox"/> Test required at least every 3 years after installation/test noted above | | | |
| <input type="checkbox"/> Test required within 6 months of any repair activity | | | |
| The cathodic protection system is effective, testing was performed according to NACE Standard RP-0285, and is providing cathodic protection to all tanks and product lines: [x] Yes [] No | | | |
| Signature of Tester  | | Date 9/8/2025 | |

UST SYSTEM INFORMATION

| TANK # | YR TANK INSTALLED | CAPACITY | TANK MATERIAL | LINED? Y/N Date | YR CP INSTALLED | PIPING MATERIAL | YR CP INSTALLED |
|--------|----------------------|----------|---------------|-----------------|--------------------|--------------------|--------------------|
| 1 | | 10,310 | Steel | No | 1997 | Steel | 1997 |
| 2 | | 6,260 | Steel | No | 1997 | Steel | 1997 |
| 3 | | 6,260 | Steel | No | 1997 | Steel | 1997 |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

UST SITE PLAN – Draw a diagram showing the important parts of the facility (tanks, lines, manway locations, turbines, vents, rectifier, pump islands, buildings). Indicate reference cell locations where structure-to-soil potential or continuity measurements have been made and label (R-1, R-2, R-3); location of all anodes and wires; location of CP test stations.

Facility Name City of Portland - Tabor Test Date 9/8/2025 Facility # 130428

IMPRESSED CURRENT CP TEST RESULTS REPORT PAGE

RECTIFIER DATA

RECTIFIER MANUFACTURER: Universal

RATED DC OUTPUT: 40 VOLTS 22 AMPS

RECTIFIER MODEL: GSAI

RECTIFIER SERIAL NUMBER: 973186

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

| | DATE | TAP SETTINGS | | DC OUTPUT | | HOUR METER | COMMENTS |
|------------|---------------|--------------|----------|------------|------------|-----------------|----------|
| | | Coarse | Fine | Volts | AMPS | | |
| "As Found" | <u>9/8/25</u> | <u>1</u> | <u>3</u> | <u>6.5</u> | <u>1.0</u> | <u>37769.38</u> | |
| "As Left" | <u>9/8/25</u> | <u>1</u> | <u>3</u> | <u>6.5</u> | <u>1.0</u> | <u>37771.18</u> | |

STRUCTURE TO SOIL POTENTIAL MEASUREMENTS

| ID | STRUCTURE | CONTACT POINT | REFERENCE CELL LOCATION | ON | INSTANT OFF | 100MV | |
|----|----------------------|--------------------|-------------------------|----------------|----------------|--------------|-------------|
| | | | | | | NATIVE | CHANGE |
| | <u>T1/T2/T3/Pipe</u> | <u>Probe Riser</u> | <u>T1 Probe Manway</u> | <u>-1.089</u> | <u>-.901</u> | <u>-.450</u> | <u>.451</u> |
| | <u>T1/T2/T3/Pipe</u> | <u>Probe Riser</u> | <u>T2 Probe Manway</u> | <u>-1.094</u> | <u>-.857</u> | <u>-.451</u> | <u>.406</u> |
| | <u>T1/T2/T3/Pipe</u> | <u>Probe Riser</u> | <u>T3 Probe Manway</u> | <u>-1.041</u> | <u>-.841</u> | <u>-.450</u> | <u>.391</u> |
| | <u>T1/T2/T3/Pipe</u> | <u>Probe Riser</u> | <u>Dispenser 1-2</u> | <u>-1.0547</u> | <u>-.839</u> | <u>-.412</u> | <u>.437</u> |
| | <u>T1/T2/T3/Pipe</u> | <u>Probe Riser</u> | <u>Dispenser 3</u> | <u>-1.036</u> | <u>-.844</u> | <u>-.413</u> | <u>.431</u> |
| | <u>T1/T2/T3/Pipe</u> | <u>Probe Riser</u> | <u>Dispenser 4</u> | <u>-1.076</u> | <u>-.834</u> | <u>-.413</u> | <u>.421</u> |
| | | | | | | | |
| | | | | | | | |

CP TEST STATION REQUIREMENTS

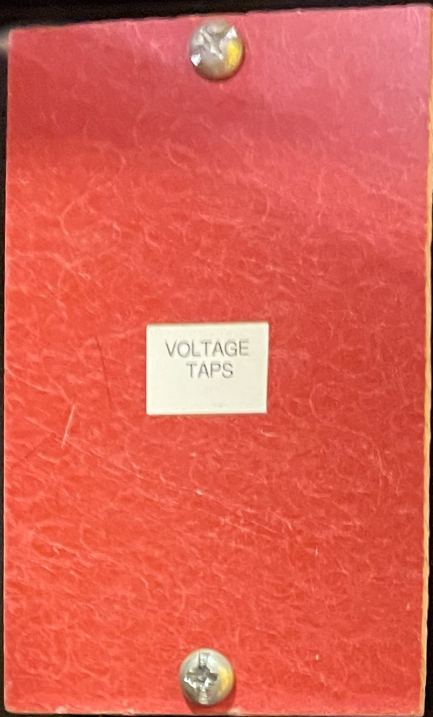
Have previous test records been reviewed? ☒ Yes ☐ No

Is this CP test consistent with previous tests? ☒ Yes ☐ No

If test procedures have changed since last test, please explain:

Have potential measurements been made at all tanks and piping including any buried flex-connectors? ☒ Yes ☐ No

COMPLETE IF ANY REPAIRS OR MODIFICATIONS TO THE CP SYSTEM ARE MADE OR ARE NECESSARY



(603) 853-6781
This equipment has been inspected in accordance with industry standards regarding an ETL report.
Date 12-17-97
Engr VADER
FIELD
EVALUATION Ref 3575463
M 350900

Universal
RECTIFIERS, INC.

CATHODIC PROTECTION RECTIFIER

| | | | |
|------------|-------|---------------|----------|
| MODEL | GSAI | SERIAL NUMBER | 973186 |
| A.C. VOLTS | 115 | A.C. AMPS | 10.9 |
| D.C. VOLTS | 40 | D.C. AMPS | 22 |
| AMB. TEMP. | 50 °C | PHASE | 1 Hz, 60 |

UNIVERSAL RECTIFIERS, INC.
P.O. BOX 1640 ROSENBERG, TEXAS 77471

POWER



MAIN DISCONNECT



A.C. FUSE



30A



POSITIVE



SHUNT



NEGATIVE

NOTICE
This Unit Wired
For 115 V.A.C.
1φ Phase

FW: City of Portland 2025 Containment / CP Tests

From Peralta, Lei <Makiilei.Peralta@portlandoregon.gov>

Date Tue 10/7/2025 1:00 PM

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

 4 attachments (8 MB)

20250908 1221 SW 1st Ave Portland OR CP Report.pdf; 20250908 2835 N Kerby Ave Portland OR Containment Report.pdf;
20250908 6437 SE Division St Portland OR CP Report.pdf; 20250909 1850 N Interstate Ave Portland OR Containment Report.pdf;

You don't often get email from makiilei.peralta@portlandoregon.gov. [Learn why this is important](#)

Hi Emily,

This was the response from our service provider, he did the CP testing, but is holding off on the bucket and sumps to do with our annual inspection.

Best Regards,

Lei Peralta



[The City of Portland is committed to providing meaningful access. To request translation, interpretation, modifications, accommodations, or other auxiliary aids or services, contact 311 \(503-823-4000\), for Relay Service & TTY: 711.](#)

From: Mike Driggs <miked@nwtli.com>

Sent: Tuesday, October 7, 2025 12:20 PM

To: Peralta, Lei <Makiilei.Peralta@portlandoregon.gov>

Cc: Roy, Mike <Michael.Roy@portlandoregon.gov>; Brad Boston <bradb@nwtli.com>; John Woods <johnw@nwtli.com>

Subject: City of Portland 2025 Containment / CP Tests

The following sites will have buckets and sumps done during the December normal compliance routine.

- 1st and jeff (buckets)
- Kelly (buckets and sumps)
- Tabor (buckets)

NW TANK LINING & INSPECTION, INC.

Mike Driggs | Director of Testing & Compliance
415-997-8034

UST/AST Testing & Compliance Solutions



Re: Oregon DEQ UST Inspection Determination: City of Portland Vehicle Services #4646 Tabor

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

Date Wed 10/8/2025 9:44 AM

To UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>; Makiilei.Peralta@portlandoregon.gov
<makiilei.peralta@portlandoregon.gov>

Good morning,

Thank you for sending the CP test, that satisfies the corrective action requirement.

The UST inspection for **DEQ facility 4646 Portland City of Vehicles Services Division Garage located at 6437 SE Division St Portland, OR** is officially CLOSED COMPLETE.

Thank you for the communication throughout this process and keeping your facility in compliance with Oregon rules and regulations.

On a side note - please let me know if the names of any of the City of Portland UST facilities are incorrect. It is very simple to update the name. I see that this facility is also references as Mt Tabor Yard.



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 22, 2025 5:01 PM

To: GAFFNEY Ingrid * DEQ <Ingrid.GAFFNEY@deq.oregon.gov>; Makiilei.Peralta@portlandoregon.gov <makiilei.peralta@portlandoregon.gov>
Cc: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>
Subject: Re: Oregon DEQ UST Inspection Determination: City of Portland Vehicle Services #4646 Tabor

Good afternoon,
UST facility 4646 City of Portland Vehicle Services located at 6437 SE Division St Portland, OR

Please review the attached field citation. The deadline for payment of the \$150 penalty is 9/22/25. The deadline for completion of the CP testing is 10/22/25.

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](#) –



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: GAFFNEY Ingrid * DEQ <Ingrid.GAFFNEY@deq.oregon.gov>

Sent: Friday, August 22, 2025 9:45 AM

To: Makiilei.Peralta@portlandoregon.gov <makiilei.peralta@portlandoregon.gov>

Cc: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>; LITKE Emily * DEQ <Emily.Litke@deq.oregon.gov>

Subject: Oregon DEQ UST Inspection Determination: City of Portland Vehicle Services #4646 Tabor

Hello Lei (City of Portland):

Thank you for meeting with DEQ to perform the inspection at 6437 SE Division St, Portland, OR 97206 on August 14, 2025. Thank you for having Mike Driggs from NWTs present to perform a safe and efficient inspection.

Since DEQ observed a violation, enforcement will be issued per the enforcement guidance. Below are the listed violations.

You will receive the enforcement documentation via a separate email from the UST Duty officer email. The payment can be made via [Your DEQ Online Website](#).

***Please email the UST duty officer from this point forward with all communications about the violation or when sending over the final testing records and any repair documentation. DO NOT SEND THEM TO ME. Contact the UST Duty Officer at 503-229-5034 or ust.dutyofficer@deq.oregon.gov**

Violations:

1. D5a – Failure to conduct the most recent 3-year corrosion protection test of the impressed current system. Last test was performed February 2nd, 2022. Due February 2025.
OAR 340-150-0325(2)(b) Class I

Corrective Actions:

1. Complete cathodic protection testing of the impressed current system within 60 days. Maintain records and submit compliance testing results to DEQ by **October 22nd , 2025 via the UST Duty officer email: ust.dutyofficer@deq.oregon.gov (Service provider will submit online too, via YDO)**

Observations of Note:

- The site has American safe suction, from what was observed, with the check valve at the tank not below the suction pump. The site needs to perform line testing every 3 years per the rules moving forward. OAR 340-150-410 (5). The rule is attached for reference. If Mike Driggs did this when he checked the system, and I missed it let me know.

Regards,

Ingrid Gaffney
UST Compliance Inspector
DEQ UST Program
700 NE Multnomah St, Ste 600
Portland, OR 97232
503-875-1246
<https://www.oregon.gov/deq/Pages/index.aspx>
she/ her

Fee

\$ 150.00

—

Paid

\$ 150.00

=

Due

\$ 0.00

Penalty

▶ 2025-fc-9977

UST - Field Citation

\$ 150.00

1 Results

Add Penalty

Send to FIMS

Payment

Credit Card

8/27/2025

8/27/2025

DEQEDM000059228

\$ 150.00

| Type | Amount |
|-------------|--------|
| Credit Card | 150 |

| | |
|-------------------------|-----------------------|
| E-Payment Confirmation# | E-Payment Settle Date |
| DEQEDM000059228 | 08/27/2025 |
| Ref# | Payment Date |
| | 08/27/2025 |

Comments

Site Info

Portland City of Vehicle Svcs Div Garage

6437 SE DIVISION ST, PORTLAND, OR 97206

5567 ✓

199967

ORQ000013656 UST (4646)

Stationary

Inspection Info

10573 Completed

UST

Full Compliance Inspection (FCI) TCR only

Start Date 8/13/2025

End Date 8/13/2025

Created & Updated Info