



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Headquarters Office

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

TTY 711

May 30, 2025

Brenda Donovan
BP Products North America Inc.
PO Box 6038,
Artesia, CA 90702

RE: UST Compliance Inspection
DEQ UST # 6122 – Arco 5874
DEQ UST # 3985 – Arco 4477
DEQ UST # 3952 – Arco 4192
DEQ UST # 3938 – Arco 889
DEQ UST # 3954 – Arco 4208

Attention Brenda Donovan,

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

If I do not hear from you, the inspection for these facilities is scheduled for July 8th, 2025 starting at approximately 9:00am at the DEQ UST #6122 – Arco 5874 located at: 9220 SE Holgate Blvd, Portland, Or. Then the following will be, Arco 4477 located at: 16141 SE Division St, Portland, Or. Then to Arco 4192 located at: 18030 E Burnside St, Portland, Or.

The final two facilities are scheduled for July 9th, 2025 starting at approximately 9:00am at the DEQ UST #3938 – Arco 889 located at 1511 NE 102nd, Portland, Or and then to DEQ UST #3954 Arco 4208 located at 12140 NE Halsey St, Portland, Or.

Please note that the inspection will require uninterrupted participation and attendance by you or a knowledgeable assistant. For the inspection you need to provide access to tank sumps, under dispenser areas, cathodic protection rectifiers, and leak monitoring equipment. DEQ will not touch the equipment or enter the facility, if you are unable to assist with equipment access, please have your UST Service Provider there. This inspection may also include review of Stage I Vapor Recovery.

To complete this inspection, you will need to have compliance testing records available on-site on the day of the inspection or sent to me prior to the inspection at blakely.gilbert@deq.oregon.gov. If the records are not available during the day of the inspection, you will have five (5) business days 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) 360-4408 or blakely.gilbert@deq.oregon.gov to answer any questions you may have and assist you in the preparation for your inspection.

Sincerely,

A handwritten signature in black ink that reads "Blake GILBERT". The signature is written in a cursive style, with the first name "Blake" in a more fluid script and the last name "GILBERT" in a slightly more formal, capitalized cursive.

Blake Gilbert
UST Compliance Specialist
Headquarters Office

Inspection Survey

Submitted by: blakely.gilbert_deq

Submitted time: Jul 9, 2025, 3:10:51 PM

Date

Jul 9, 2025

Time

08:31

UST Facility ID

3,938

Inspector

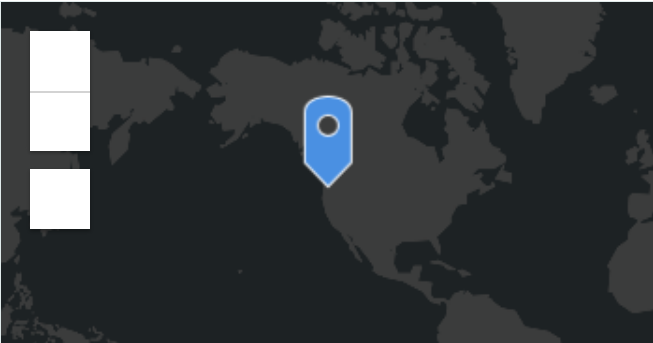
Gilbert

Type of Inspection

Full Compliance

Location

Lat: 45.533568 Lon: -122.558404



Esri, FAO, NOAA, USGS

Powered by Esri

Photograph

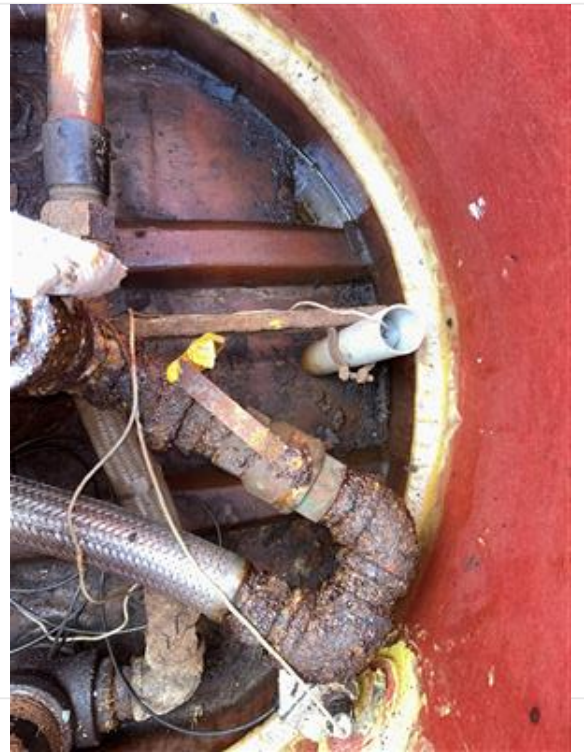


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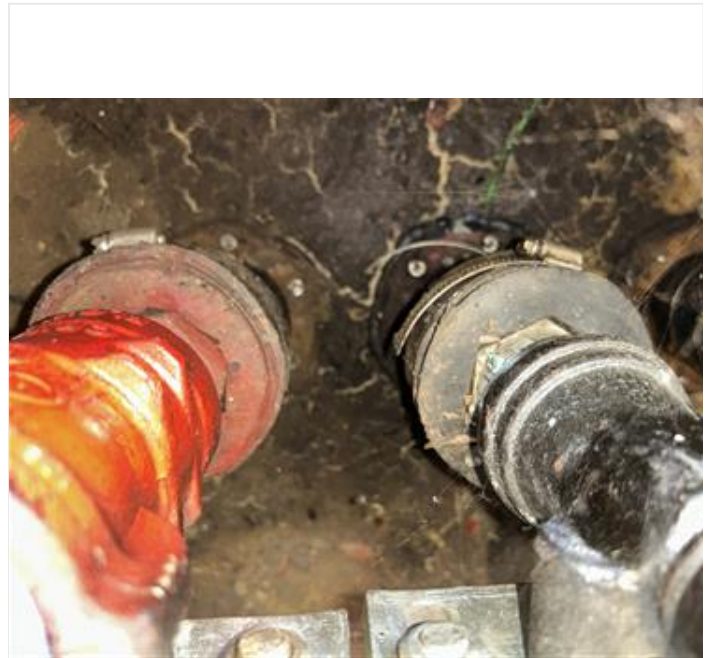
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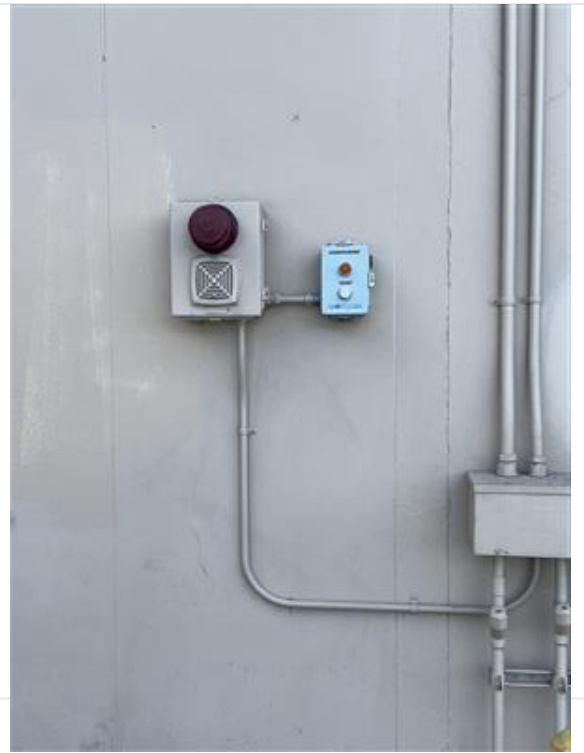


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Notes

Fuel in both reg. Sumps and sensors needs moved to lowest point

VII. Release Detection

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

Compliance

☒ Yes ☐ No

Date of last testing: 7-29-24

8-1-23

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: 7-29-24

Last three tests available?

☒ Yes ☐ No

Number of lines tested: 2

Number of LD tested: 3

Leak detector manufacturer make and model: VR 848480

JLS-350

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: 7-29-24

Last two tests available?

☒ Yes ☐ No

Date of last sensor testing:

Last three tests available?

☐ Yes ☐ No

Float sensors installed correctly?

☐ Yes ☐ No

Interstitial space opened to sump?

☒ Yes ☐ No

Presence of water in sumps?

☐ Yes ☐ No

☒ Safe Suction

Check valve directly below suction pump? ☐ Yes ☐ No

c) Monthly Tank Release Detection (Check all that apply)

☐ Tank Gauge ☐ CSLD ☐ SCALD ☐ Static

Are correct tank sizes programmed at tank gauge?

☐ Yes ☐ No

Tank diameter/length seem appropriate?

☐ Yes ☐ No

Are tanks manifolded?

☒ Yes ☐ No

If so, tank gauge testing setup for manifolded tanks?

☒ Yes ☐ No

If Veeder Root tank gauge leak detection

☐ CSLD set at 99%

☒ Thermal coefficient set correctly?

(Gasoline 0.00070; Diesel 0.00045)

If Incon/Franklin tank gauge leak detection

☐ If SCALD is Vol Qual set to 14% (or 99% confidence)

☐ Is API gravity set correctly?

(Regular 63.5; Plus 62.8; Super 51.3; Diesel 32.8)

For all tank gauges doing static tests

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

☒ Interstitial Monitoring [Monthly records must include, date system was checked, observations made, initials of person checking.

Electronic records must include power status (on or off), alarm indication status (yes or no) and sensor malfunction notes (yes or no).]

☐ SIR

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

Tank release detection records available during inspection

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: Blake Gilbert

Date:

7-9-25

Time:

7 AM

Facility:

3938

VIII. Spill Prevention

Compliance

☒ Yes ☐ No

Date(s) of testing:

2-6-24

2-10-21

Number of spill buckets tested?

☒ Yes ☐ No

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

→ Passed retest 3-4-21

☐ 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:

7/26/22

8-6-19 - Retest passed 1-7-21 old

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

(X) General notes from inspection

T-2 Reg Master
Mar 4th 2021 Sudden loss Alarm? Justin looking into it,

Representative onsite: _____ email: _____

T-3 sleek over full Alarm
May 21 2022?
May 2 2023?
OK

1. on "Reg" manifold Tank top Sump Liquid fuel observed in sump.
9/30 ~~9/30~~ Sensor needs moved to ~~test~~ lowest point.
2. on Regular Primers Tank top sump ~~pool~~ Liquid fuel pooled observed in sump.
Justin @ Belshire to get dispatch to investigate -

Justin is getting dispatch to investigate.

Small amount of water only.

Liquid fuel pooled

Liquid fuel

in sump

Sensor needs moved to lower point.

Lot of collection Rack on ST Pan Fittings -

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

Inspector Signature: _____ Blake Gilbert

already d. date: 7-9-25

Reg water meter shows water in Inter RF DW spill bucket

FCI #3938

IN-TANK SETUP

SYSTEM SETUP

JUL 9. 2025 8:37 AM

SYSTEM UNITS

U.S.

SYSTEM LANGUAGE

ENGLISH

SYSTEM DATE/TIME FORM

MON DD YYYY HH:MM:SS

4400 00689

1511 NE 102ND

PORTLAND, OR 97220

91164647905001

T 1: PREMIUM

PRODUCT CODE : 3
THERMAL COEFF : .000700
TANK DIAMETER : 117.00
TANK PROFILE : 20 PTS
FULL VOL : 10369
111.2 INCH VOL : 10197
105.3 INCH VOL : 9891
99.4 INCH VOL : 9478
93.6 INCH VOL : 9006
87.7 INCH VOL : 8448
81.9 INCH VOL : 7864
76.0 INCH VOL : 7228
70.2 INCH VOL : 6563
64.3 INCH VOL : 5893
58.5 INCH VOL : 5199
52.6 INCH VOL : 4505
46.8 INCH VOL : 3835
40.9 INCH VOL : 3155
35.1 INCH VOL : 2531
29.2 INCH VOL : 1933
23.4 INCH VOL : 1385
17.5 INCH VOL : 900
11.7 INCH VOL : 500
5.8 INCH VOL : 188

FLOAT SIZE: 2.0 IN.
WATER MINIMUM : 0.000

WATER WARNING : 0.8
HIGH WATER LIMIT: 1.0
WATER ALARM FILTER: LOW

MAX OR LABEL
VOLUME : 10369

HIGH PRODUCT
% MAX : 95.0
(GALLONS) : 9851

OVERFILL LIMIT
% MAX : 90.0
(GALLONS) : 9332

DELIVERY LIMIT
% MAX : 15.0
(GALLONS) : 1555

LOW PRODUCT
VOLUME : 396

LEAK ALARM LIMIT: 8
SUDDEN LOSS LIMIT: 25
TANK TILT : 0.00
PROBE OFFSET : 0.00

SIPHON MANIFOLDED TANKS
C#: NONE
LINE MANIFOLDED TANKS
C#: NONE

T 2: REGULAR MASTER

PRODUCT CODE : 1
THERMAL COEFF : .000700
TANK DIAMETER : 117.00
TANK PROFILE : 20 PTS
FULL VOL : 10369
111.2 INCH VOL : 10197
105.3 INCH VOL : 9891
99.4 INCH VOL : 9478
93.6 INCH VOL : 9006
87.7 INCH VOL : 8448
81.9 INCH VOL : 7864
76.0 INCH VOL : 7228
70.2 INCH VOL : 6563
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29.2 INCH VOL : 1933
23.4 INCH VOL : 1385
17.5 INCH VOL : 900
11.7 INCH VOL : 500
5.8 INCH VOL : 188

FLOAT SIZE: 2.0 IN.
WATER MINIMUM : 0.000

WATER WARNING : 0.8
HIGH WATER LIMIT: 1.0
WATER ALARM FILTER: MED

MAX OR LABEL
VOLUME : 10369

HIGH PRODUCT
% MAX : 95.0
(GALLONS) : 9851

OVERFILL LIMIT
% MAX : 90.0
(GALLONS) : 9332

DELIVERY LIMIT
% MAX : 15.0
(GALLONS) : 1555

LOW PRODUCT
VOLUME : 396

LEAK ALARM LIMIT: 8
SUDDEN LOSS LIMIT: 25
TANK TILT : 0.00
PROBE OFFSET : 0.00

SIPHON MANIFOLDED TANKS
C#: NONE
LINE MANIFOLDED TANKS
C#: 03

T 3: REGULAR SLAVE

PRODUCT CODE : 1
THERMAL COEFF : .000700
TANK DIAMETER : 117.00
TANK PROFILE : 20 PTS
FULL VOL : 10369
111.2 INCH VOL : 10197
105.3 INCH VOL : 9891
99.4 INCH VOL : 9478
93.6 INCH VOL : 9006
87.7 INCH VOL : 8448
81.9 INCH VOL : 7864
76.0 INCH VOL : 7228
70.2 INCH VOL : 6563
64.3 INCH VOL : 5893
58.5 INCH VOL : 5199
52.6 INCH VOL : 4505
46.8 INCH VOL : 3835
40.9 INCH VOL : 3155
35.1 INCH VOL : 2531
29.2 INCH VOL : 1933
23.4 INCH VOL : 1385
17.5 INCH VOL : 900
11.7 INCH VOL : 500
5.8 INCH VOL : 188

FLOAT SIZE: 2.0 IN.
WATER MINIMUM : 0.000

WATER WARNING : 0.8
HIGH WATER LIMIT: 1.0
WATER ALARM FILTER: MED

MAX OR LABEL
VOLUME : 10369

HIGH PRODUCT
% MAX : 95.0
(GALLONS) : 9851

OVERFILL LIMIT
% MAX : 90.0
(GALLONS) : 9332

DELIVERY LIMIT
% MAX : 15.0
(GALLONS) : 1555

LOW PRODUCT
VOLUME : 396

LEAK ALARM LIMIT: 8
SUDDEN LOSS LIMIT: 25
TANK TILT : 0.00
PROBE OFFSET : 0.00

SIPHON MANIFOLDED TANKS
C#: NONE
LINE MANIFOLDED TANKS
C#: 02



State of Oregon
Department of
Environmental
Quality

Program Enforcement No. 2025-FC-9942

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:	07/09/2025	Facility ID#:	3938
Inspector:	Blakely GILBERT	Facility Name:	ARCO 889
DEQ Office:	700 NE Multnomah St Suite 600	Facility Address:	1511 NE 102ND ST, PORTLAND, Oregon 97220
Phone #:	503-360-4408	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:	☐ In Person	☒ By Email	☐ Both	Date Issued: 07/15/2025
Facility Representative Present During Inspection:	☐ Permittee ☐ Owner ☐ Other			
Name of Permittee or Owner:	BP Products North America Inc.			
Mailing Address:	PO Box 6038 , Artesia California 90702			

Field Citation Penalty – See Page 3 for detailed listing of each violation. \$ 300

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

Or pay online through your YDO account

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

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

08/15/2025

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: 07/15/2025

PROGRAM ENFORCEMENT No.: 2025-FC-9942

FACILITY ID: 3938

Page 3 of 3

Violation #1:	Failure to investigate or confirm a suspected release.		
*TCR:			
Corrective Action:	Initiate investigation to confirm source of the leak for Regular Unleaded within 5 days . Submit finding and testing results along with repair documentation to DEQ by 8/15/25		
Rule Citation: OAR 340-150-0163(1)(f)	Penalty Amount: \$ 300	Correct Violation by: 08/15/2025	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:
	Total Penalty Amount 300		
	(This Page): \$		

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

RETURN THIS FORM TO THE DEQ INSPECTOR LISTED ON PAGE 1 ON OR BEFORE: 08/15/2025

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



Work Order

Job: 637723

10107 South Tacoma Way Ste A-2
Lakewood, WA 98499
(253)572-3822
SMEDispatch@sme-solutions.com
Contractor License: 174332/SMESOL*935CH/974078

PO # : 71822308

Ref #: 71822308

Site:

Arco 00889
1511 NE 102nd St
Portland, OR 97220

Work Performed

Category:	Tanks-Lines	Unit#:	ALL
Component:	Turbine Sump	Item :	
Failure:	Liquid Needs Removal	Serial#:	
Repair:	Cleaned	Task#:	1
Enter Date/Time of Service (Military Time):	07-15-2025 12:15	The following data was recorded by (Tech First/Last Name):	Daniel f
Inspected all piping for seepage:	PASS	Inspected all gaskets and/or seals ensuring tight connection:	PASS
Cleaned all dirt & debris from sump lid track(s):	PASS - CLEANED	Removed all liquid from bottom of sump(s):	REMOVED & CLEANED
Total volume of liquid removed (GAL):	.25	Confirmed sensor operational, at lowest point and attached supporting Sensor Placement picture(s) to job:	DOES NOT APPLY
Confirm ALL sump lid screws and/or camlocks in place, rust free and operational:	PASS - REPAIRED	While addressing this task I created and cleared the following new Monitoring System alarm(s):	n/a
Waste Disposal left on site:	NO WASTE GENERATED	Attached picture of waste drum label with an accumulation date clearly written:	ON SITE SUPPLIED DRUM
Name of person site keys returned to OR Did Not Use:	n/a	Update Site Maintenance Log, TAKE PICTURE and attach picture to job:	LOG NOT AVAILABLE WHEN REQUESTED
The status of this task is:	CLOSED – COMPLETE	The following data was recorded by (Tech First/Last Name):	Daniel f

Brief Summary of Repairs or Additional Details:

Arrived on site and checked in, cleaned out both regular tanks and got about .25 gal out of each. Found the sensors to be out of place and will need two man with CSE gear to move both reg sensor into proper position. All functions normal at this time. Will need a return trip for sensors

Work Performed

Category:	Tanks-Lines	Unit#:	ALL
Component:	Lid- Turbine Sump	Item :	
Failure:	Inspect Gasket(s)	Serial#:	
Repair:	Adjusted	Task#:	2
Enter Date/Time of Service (Military Time):	07-15-2025 12:30	The following data was recorded by (Tech First/Last Name):	Daniel f
Removed all liquid and/or debris from sump(s):	COMPLETE	Waste Disposal left on site:	LIQUID
Attached picture of waste drum label with an accumulation date clearly written:	ON SITE SUPPLIED DRUM	While addressing this task I created and cleared the following new Monitoring System alarm(s):	n/a
Update Site Maintenance Log, TAKE PICTURE and attach picture to job:	LOG NOT AVAILABLE WHEN REQUESTED	Name of person site keys returned to OR Did Not Use:	n/a



Work Order

Job: 637723

Contractor License: 174332/SMESOL*935CH/974078

PO # : 71822308

Ref #: 71822308

The status of this task is: **CLOSED - COMPLETE** The following data was recorded by (Tech First/Last Name): **Daniel f**

Brief Summary of Repairs or Additional Details:

Arrived on site and checked in, cleaned out both regular tanks and got about .25 gal out of each. Found the sensors to be out of place and will need two man with CSE gear to move both reg sensor into proper position. All functions normal at this time. Will need a return trip for sensors

Work Performed

Category:	Tanks-Lines	Unit#:	ALL
Component:	Lid- Turbine Sump	Item :	
Failure:	Inspect Camlock(s)	Serial#:	
Repair:	No Problem Found	Task#:	3

Enter Date/Time of Service (Military Time): **07-15-2025 12:45** The following data was recorded by (Tech First/Last Name): **Daniel f**

Update Site Maintenance and ISD Logs, TAKE PICTURES and attach to job: **LOG NOT AVAILABLE WHEN REQUESTED** Name of person site keys returned to or Did Not Use: **n/a**

The status of this task is: **CLOSED - COMPLETE** The following data was recorded by (Tech First/Last Name): **Daniel f**

Brief Summary of Repairs or Additional Details:

Arrived on site and checked in, cleaned out both regular tanks and got about .25 gal out of each. Found the sensors to be out of place and will need two man with CSE gear to move both reg sensor into proper position. All functions normal at this time. Will need a return trip for sensors

Work Performed

Category:	Tanks-Lines	Unit#:	ALL
Component:	Turbine Sump	Item :	
Failure:	Water Intrusion	Serial#:	
Repair:	Cleaned	Task#:	4

Enter Date/Time of Service (Military Time): **07-15-2025 13:00** The following data was recorded by (Tech First/Last Name): **Daniel f**

Reviewed Site Maintenance Log AND Fieldpoint Service History for recent service: **LOG NOT AVAILABLE WHEN REQUESTED** Issue reported is for grade: **REGULAR**

Confirmed Sensor(s) in lowest position: **DOES NOT APPLY** Waste Disposal left on site: **LIQUID**

Attached picture of waste drum label with an accumulation date clearly written: **ON SITE SUPPLIED DRUM** While addressing this task I created and cleared the following new Monitoring System alarm(s): **N/a**

Update Site Maintenance Log, TAKE PICTURE and attach picture to job: **LOG NOT AVAILABLE WHEN REQUESTED** Name of person site keys returned to OR Did Not Use: **n/a**

The status of this task is: **CLOSED - COMPLETE** The following data was recorded by (Tech First/Last Name): **Daniel f**

Brief Summary of Repairs or Additional Details:

Arrived on site and checked in, cleaned out both regular tanks and got about .25 gal out of each. Found the sensors to be out of place and will need two man with CSE gear to move both reg sensor into proper position. All functions normal at this time. Will need a return trip for sensors

Work Performed



Work Order

Job: 637723

Contractor License: 174332/SMESOL*935CH/974078

PO # : 71822308

Ref #: 71822308

Category:	Monitoring	Unit#:	ALL
Component:	Sensor - Turbine Sump	Item :	
Failure:	Verify Placement	Serial#:	
Repair:	Confirmed	Task#:	5
Enter Date/Time of Service (Military Time):	07-18-2025	The following data was recorded by (Tech First/Last Name):	TODD
Confirmed alarm status on site monitoring system:	DOES NOT APPLY	Captured/Printed System Setup:	COMPLETE
Performed System Archive Backup:	COMPLETE	Verified Power requirements:	PASS
Confirmed Communication:	PASS	Verified Functionality:	PASS
Verified Programming:	PASS	Added MONITOR CERT TASK to job due to Monitoring Component REPLACED and/or COLD START performed:	DOES NOT APPLY
Cleared alarm on monitoring system:	DOES NOT APPLY	While addressing this task I created and cleared the following new Monitoring System alarm(s):	NA
Update Site Maintenance Log, TAKE PICTURE and attach picture to job:	COMPLETE	Name of person site keys returned to OR Did Not Use:	DNU
The status of this task is:	CLOSED - COMPLETE	The following data was recorded by (Tech First/Last Name):	TODD

Brief Summary of Repairs or Additional Details:

Put metal strapping on sensor so that we were able to place it closer to proper position which is lowest point in sump where line goes through sump wall.

Work Performed

Category:	Tanks-Lines	Unit#:	NA
Component:	TLM Sump	Item :	
Failure:	Liquid Needs Removal	Serial#:	
Repair:	Removed Unknown Liquid	Task#:	6
Enter Date/Time of Service (Military Time):	07-15-2025 13:15	The following data was recorded by (Tech First/Last Name):	Daniel f
Inspected all piping for seepage:	PASS	Inspected all gaskets and/or seals ensuring tight connection:	PASS - REPAIRED
Cleaned all dirt & debris from sump lid track(s):	PASS	Removed all liquid from bottom of sump(s):	REMOVED & CLEANED
Total volume of liquid removed (GAL):	.25	Confirmed sensor operational, at lowest point and attached supporting Sensor Placement picture(s) to job:	DOES NOT APPLY
Confirm ALL sump lid screws and/or camlocks in place, rust free and operational:	PASS	While addressing this task I created and cleared the following new Monitoring System alarm(s):	n/a
Waste Disposal left on site:	NO WASTE GENERATED	Attached picture of waste drum label with an accumulation date clearly written:	DRUM NOT REQUIRED/USED
Name of person site keys returned to OR Did Not Use:	n/a	Update Site Maintenance Log, TAKE PICTURE and attach picture to job:	LOG NOT AVAILABLE WHEN REQUESTED
The status of this task is:	CLOSED – COMPLETE	The following data was recorded by (Tech First/Last Name):	Daniel f

Brief Summary of Repairs or Additional Details:



Work Order

Job: 637723

Contractor License: 174332/SMESOL*935CH/974078

PO # : 71822308

Ref #: 71822308

Arrived on site and checked in, cleaned out both regular tanks and got about .25 gal out of each. Found the sensors to be out of place and will need two man with CSE gear to move both reg sensor into proper position. All functions normal at this time. Will need a return trip for sensors

Work Performed

Category:	Tanks-Lines	Unit#:	NA
Component:	Lid- TLM Sump	Item :	
Failure:	Inspect Camlock(s)	Serial#:	
Repair:	Inspect Passed	Task#:	7
Enter Date/Time of Service (Military Time):	07-15-2025 13:30	The following data was recorded by (Tech First/Last Name):	Daniel f
Update Site Maintenance and ISD Logs, TAKE PICTURES and attach to job:	LOG NOT AVAILABLE WHEN REQUESTED	Name of person site keys returned to or Did Not Use:	n/a
The status of this task is:	CLOSED - COMPLETE	The following data was recorded by (Tech First/Last Name):	Daniel f

Brief Summary of Repairs or Additional Details:

Arrived on site and checked in, cleaned out both regular tanks and got about .25 gal out of each. Found the sensors to be out of place and will need two man with CSE gear to move both reg sensor into proper position. All functions normal at this time. Will need a return trip for sensors

Work Performed

Category:	Tanks-Lines	Unit#:	NA
Component:	Lid- TLM Sump	Item :	
Failure:	Inspect Gasket(s)	Serial#:	
Repair:	Adjusted	Task#:	8
Enter Date/Time of Service (Military Time):	07-15-2025 13:45	The following data was recorded by (Tech First/Last Name):	Daniel f
Removed all liquid and/or debris from sump(s):	COMPLETE	Waste Disposal left on site:	LIQUID
Attached picture of waste drum label with an accumulation date clearly written:	ON SITE SUPPLIED DRUM	While addressing this task I created and cleared the following new Monitoring System alarm(s):	n
Update Site Maintenance Log, TAKE PICTURE and attach picture to job:	LOG NOT AVAILABLE WHEN REQUESTED	Name of person site keys returned to OR Did Not Use:	n/a
The status of this task is:	CLOSED - COMPLETE	The following data was recorded by (Tech First/Last Name):	Daniel f

Brief Summary of Repairs or Additional Details:

Arrived on site and checked in, cleaned out both regular tanks and got about .25 gal out of each. Found the sensors to be out of place and will need two man with CSE gear to move both reg sensor into proper position. All functions normal at this time. Will need a return trip for sensors

Work Performed

Category:	Monitoring	Unit#:	NA
Component:	Sensor - Turbine Sump	Item :	
Failure:	Verify Placement	Serial#:	
Repair:	Relocated	Task#:	9
Enter Date/Time of Service (Military Time):	07-18-2025	The following data was recorded by (Tech First/Last Name):	Stephen Owens
Confirmed alarm status on site monitoring system:	DOES NOT APPLY	Captured/Printed System Setup:	COMPLETE



Work Order

Job: 637723

Contractor License: 174332/SMESOL*935CH/974078

PO # : 71822308

Ref #: 71822308

Performed System Archive Backup:	COMPLETE	Verified Power requirements:	PASS
Confirmed Communication:	PASS	Verified Functionality:	PASS
Verified Programming:	PASS	Added MONITOR CERT TASK to job due to Monitoring Component REPLACED and/or COLD START performed:	DOES NOT APPLY
Cleared alarm on monitoring system:	DOES NOT APPLY	While addressing this task I created and cleared the following new Monitoring System alarm(s):	n/a
Update Site Maintenance Log, TAKE PICTURE and attach picture to job:	LOG NOT AVAILABLE WHEN REQUESTED	Name of person site keys returned to OR Did Not Use:	did not use
The status of this task is:	CLOSED - COMPLETE	The following data was recorded by (Tech First/Last Name):	Stephen Owens

Brief Summary of Repairs or Additional Details:

Sensor moved to correct position.

Labor and Travel

Start Date	Tech Name	Travel	Labor	Total Hours
7/15/2025 12:00 PM	DANIELF	0.25	1.50	1.75
7/18/2025 8:00 AM	TODDS	1.00	3.00	4.00
7/18/2025 8:30 AM	ALEXANDERL	0.50	2.75	3.25
7/18/2025 10:15 AM	STEPHENO	1.75	1.25	3.00
Totals:		3.50	8.50	12.00

Parts and Materials

Entry Date	Description	Qty
7/09/2025	Administrative Fees	1.00
7/15/2025	Mileage Charges	3.00
7/09/2025	Misc Safety Equipment	1.00

We do not guarantee solutions to all problems with one service call. Due to part and equipment issues, intermittent problems, and other reasons, multiple trips may be required. Travel charges will be added for each service call required. Your signature below acknowledges that the times recorded and work described is accurate. If applicable, parts and labor warranty is limited to that offered by the manufacturer only. Customer is responsible to verify that all programming (i.e. pricing, PLU, etc.) is accurate. SME Solutions, LLC is not responsible for any damages, loss, or expenses incurred due to electronic system failure, data breach, or corruption including, but not limited to, connectivity for hardware, software operation, virus or malware, or program setting /reports that may be related to our work. We are not responsible for down time or loss of business or revenues due to the work being performed. Current labor and travel rates, in effect at the time of this work, will be charged. This is not a final invoice. All terms and conditions in your current customer agreement or quote for this specific job are in effect.

Signature:

Signed By Manager

Date Signed 7/18/2025 11:58:00 AM



SME SOLUTIONS, LLC

Contractor License: 174332/SMESOL*935CH/974078

Work Order

Job: 637723

PO # : 71822308

Ref #: 71822308



Re: DEQ UST # 3938 - Arco 889

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

Date Tue 8/5/2025 8:50 AM

To UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>; Donovan, Brenda <brenda.donovan@bp.com>

Good morning,

Payment of the penalty was processed on 8/4/25. The UST inspection for DEQ facility #3938 ARCO 889 located at 1511 NE 102nd St Portland, OR 97220 is officially **CLOSED and COMPLETE**.

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



Emily Litke (she/her)

Duty Officer, Underground Storage Tanks

DEQ Headquarters, Land Quality Division

700 NE Multnomah Street, Suite 600

Portland OR 97232-4100

503-806-9516

Emily.LITKE@deq.oregon.gov

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

Sent: Friday, July 18, 2025 3:30 PM

To: Donovan, Brenda <brenda.donovan@bp.com>; UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>

Subject: RE: DEQ UST # 3938 - Arco 889

Hey Brenda,

Thank you for sending this work order – everything looks great. I will mark the corrective actions as complete.

As soon as the payment of the \$300 penalty is received, then this UST inspection can be closed. I appreciate your swift communication.

**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: Donovan, Brenda <brenda.donovan@bp.com>
Sent: Friday, July 18, 2025 1:53 PM
To: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>
Subject: RE: DEQ UST # 3938 - Arco 889

Hello Emily – Attached please find completed work order documentation from SME Solutions dated July 15, 2025 to inspect and clean the sumps indicated in the citation from Blake Gilbert below. SME technician inspected, cleaned, and verified all functions normal (see page 1 highlighted section).

SME technicians returned today, July 18, 2025, with confined space entry to move the sensors to the lowest spot in the sump as verbally indicated during Blake's inspection. See page 3 highlighted section for Technicians notes.

I believe this closes out the corrective actions from this inspection.
Please let me know if you need anything else.

Thanks,

Brenda Donovan

HSSE& C Advisor – Pacific NW

Bp, US Convenience



Mobile: 971-322-7607

Email: Brenda.Donovan@bp.com

This email is confidential. It may also be privileged or otherwise protected by legal rules. If you have received it by mistake or are not the addressee please let me know by reply and then delete it from your system. Do not copy, forward or distribute the email or disclose its contents to anyone.

From: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>
Sent: Tuesday, July 15, 2025 5:57 PM
To: UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>
Cc: Donovan, Brenda <brenda.donovan@bp.com>
Subject: Re: DEQ UST # 3938 - Arco 889

Good afternoon,
UST facility 3938 ARCO 889 located at 1511 NE 102nd St Portland, OR 97220

Please review the attached field citation. **The deadline for payment of the \$300 penalty is 8/15/25. The corrective action has a initial deadline of 7/20/25 for investigation into the regular unleaded sump and 8/15/25 deadline for final testing/invoices.**

Corrective Actions:

1. Initiate investigation to confirm source of the leak for Regular Unleaded **within 5 days (7/20/25). The product was pooling in each regular unleaded sump.** Submit findings and testing results along with repair documentation to DEQ by 8/15/25.

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 on submitting payments online

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

itservicedesk@deq.oregon.gov or

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

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

Sent: Monday, July 14, 2025 3:14 PM

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

Cc: brenda.donovan@bp.com <brenda.donovan@bp.com>

Subject: DEQ UST # 3938 - Arco 889

Brenda,

Thank you for having Justin meet with DEQ to perform the inspection at Arco 889 – 1511 NE 102nd, Portland. DEQ UST #3938 July 9, 2025

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

Note:

The product was pooling in each regular unleaded sump.

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

***Please email the UST duty officer 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. L2 -Failing to investigate or confirm a suspected release in Both Regular Unleaded STP Sumps

340-150-0510(1) Class I. \$300.00 fine.

Corrective Actions:

1. Initiate investigation to confirm source of the leak for Regular Unleaded **within 5 days** either schedule or have a licensed technician assess the necessary repairs. **The product was pooling in each regular unleaded sump.** Submit finding and testing results along with repair documentation to DEQ by **July 18, 2025, via the UST Duty officer email.**



Blake Gilbert (he/him)

Inspector, Underground Storage Tanks
DEQ Headquarters, Land Quality Division
700 NE Multnomah Street, Suite 600
Portland OR 97232-4100
C 503-360-4408

Fee	—	Paid	=	Due
\$ 300.00		\$ 300.00		\$ 0.00

Penalty

▶ 2025-fc-9942

UST - Field Citation

\$ 300.00

1 Results

Add Penalty Send to FIMS

Payment

▼ Check by Mail 4000012346

8/4/2025

52550

\$ 300.00

TypeAmount

Check by Mail300

E-Payment Confirmation#E-Payment Settle Date

mm/dd/yyyy

Ref#Payment Date

5255008/04/2025

Comments

2025-FC-9942

(Remaining Length: 3988)

Site Info

ARCO 889

Google

1511 NE 102ND ST, PORTLAND, OR 97220

23355 ✓

233061

dbo.Incident.LustId=3594 UST (3938)

Stationary

Contact Info

Inspection Info

10671 Completed

UST