

Department of Environmental Quality Northwest Region

700 NE Multnomah Street, Suite 600 Portland, OR 97232 (503) 229-5263 FAX (503) 229-6945 TTY 711

August 1, 2025

Melinda Schmidt Douglas County Public Works 2586 NE Diamond Lake Blvd Roseburg, OR 97470

RE: UST Compliance Inspection DEQ UST #06703 Douglas Co Shop Sutherlin # 4

Dear Melinda Schmidt:

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.

Thanks for confirming with me the inspection for this facility is scheduled for August 19, starting at approximately 0800 AM. 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. 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 <u>inspection</u> or sent to me prior to the inspection at **dave.pardue@deq.oregon.gov**.

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 including demonstration of overfill alarm if present
- Cathodic protection testing (if applicable)
- Tank lining records (if applicable)
- Monthly walkthrough inspection logs— for the required inspection points be sure to see the <u>Testing</u> Forms section of this page: https://www.oregon.gov/deq/tanks/pages/ustcomplianceforms.aspx

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

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

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

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

Sincerely,

Dave Pardue

Dave Pardue UST Program Coordinator and Inspector



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY INSPECTION PHOTOLOG Page 1 of

FACILITY NAME: Douglas County Shop Fac 6703 DATE: 08/19/2025



1:Tanks



2: Island



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY INSPECTION PHOTOLOG Page 1 of





3:Unleaded fill



4: Diesel fill

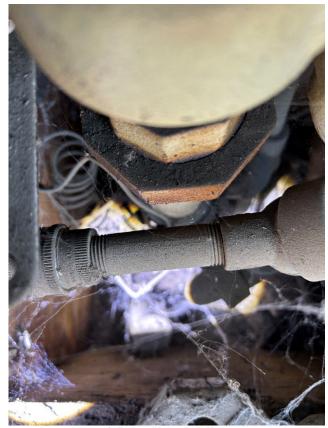


OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY **INSPECTION PHOTOLOG Page 1 of**



5: Unleaded dispenser

FACILITY NAME: Douglas County Shop Fac 6703 DATE: 08/19/2025



6: Below Unleaded disp.



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY **INSPECTION PHOTOLOG Page 1 of**



7: Diesel Dispenser

FACILITY NAME: Douglas County Shop Fac 6703 DATE: 08/19/2025



8: Spike anode below Diesel Disp



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY INSPECTION PHOTOLOG Page 1 of



9: Alarm

FACILITY NAME: Douglas County Shop Fac 6703 DATE: 08/19/2025

SET IN CONTROL OF THE PROPERTY OF THE PROPERTY

10: Op Cert



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY INSPECTION PHOTOLOG Page 1 of

FACILITY NAME: Douglas County Shop Fac 6703 DATE: 08/19/2025



11: Unleaded vent



12: Diesel Vent

								Compliance	L	Yes	(AIVO)
VII. Releas	se Detectio	etection Ope	rability Tosti	ng (Sometime	es referred	to as Tank	Gauge Cert	tification)			
a) Annual							1	an tests available?		Yes	KNO
	Date of la	ast testing:	14/251	202	27 V	. 0	Last thre	e tests available:	cott		
					70	24 04	M	7 1 29			
		tection (Check	CONTRACTOR OF THE PROPERTY OF		m	19912	g	ee tests available?			
Pressuriz	zed Piping	k Detector (N	ess testing (LLD)	□ Electronic	Leak Dete	ctor (ELLD)	Ucheck for s	wiftcheck requirement			
Mech	Idilical Leaf	, Detector N						ee tests available?		□Yes	□No
	Date of la	ast testing:									
	Number	of lines tested	d:				Number	r of LD tested:			
	Leak dete	ector manufac	cturer make	and model: _				THE SHALE			
	Tank gaug	ge manufactu	ırer make an	d model:							
		+hina mani	fold?							□ Yes	□ No
	MILD pro	duct approp	riate? (Exam	ple, diesel Re	d Jacket EX	series on	diesel syste	em?)		□ Yes	
	If ELLD ar	nd no line tes	ting: Annual	0.1 gph resul	lts from tar	ik gauge?					
- Intonctiti	ial Manifer	rina						tranic records must in	clude		
[Monthly re	ecords must i	include, date sys	stem was check	ed, observation	is made, initia	als of person o	checking. Elec	tronic records must in	cruac		
power stati	us (on or off)	, alarm indication	on status (yes o	r no) and sensor	rmaltunction	notes (yes or	110).]				
Date of	last sump	testing:					Last tw	o tests available?		□Yes	□No
Date of	last samp							: - - -		□Yes	□No
		or testing:					Last thr	ree tests available?			
		alled correct			□Yes	□ No					
		opened to su			☐ Yes	□ No					
The second secon	Property Committee of the Committee of t	er in sumps?				7					
X Safe Suc		alve directly b	pelow suction	n pump?	Yes	□No					
a) NAcosth		lease Detect						If Veeder Root tank gau	ige leak detection	on	
X Tank Ga		CSLD	SCALD			,		☐ CSLD set at 99% ☐ Thermal coefficient			
		sizes progran	nmed at tank	gauge?		Yes	□No	(Gasoline 0.00070); Diesel 0.0004		
		ength seem a				Yes	PNO	If Incon/Franklin tank g	set to 14% (or !		ice)
Are tai	nks manifo	olded?				□Yes	X No	□ Is API gravity set co (Regular 63.5; Plu		1.3; Diesel 32	2.8)
If so,	, tank gaug	ge testing set	up for manife	olded tanks?		□Yes	□No	For all tank gauges doin	ng static tests		
								(Static tests require t		un for a valid	rear)
□ Intersti	itial Monito	oring [Month	ly records must	include, date sy	stem was che	ecked, observa	ations made,	initials of person check	ing.		
Electronic	records must	t include power	status (on or of	f), alarm indicat	ion status (ye	s or no) and s	ensor malfun	ction notes (yes or no).			
SIR	Ensure	pass or fail resul	ts within 30-day	y period. Inconc	lusive result n	neans release	detection red	quirement not met			
		Drobo ou	t alarms?								
		FTODE OU	t diaiiiis:								
									24	1/	
		cion records a				5 V	A	A		LINOV	Dec
T1: Jan T2: Jan		□ Mar	□Apr	□ May	Jun		Aug	Sep	LOCT	Nov	Dec
T3: Jan		□ Mar	□Apr	□ May	Jun	Jul	☐ Aug		□ Oct	□ Nov	□ Dec
T4: 🗆 Jan		□ Mar	□ Apr	□ May	Jun	Jul	□ Aug		□ Oct	□Nov	□ Dec
T5: □ Jan	□ Feb	□ Mar	□ Apr	□ May	Jun	Jul	□ Aug		□ Oct	□ Nov	□ Dec
IJ. L. Jali	Піср	Livial	□ Ahi	Liviay	Juli	Jul	LI Aug	, Deh	ПОСС	LI IVOV	L Dec

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

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acin't j	Douglas County St. 2043 Comstock Suth	TOP Suttremment	Permittee: Melinda Schmidt	Contact			
te Address: ty: Tank Information EQ Permit #	7043 Comstock Suth			Correct	ontact		
ty: Tank Information Q Permit #	Suth	112 2 somgrock	Organization:				
Tank Information Q Permit #			Phone: 541-440-6039				
Q Permit #							
	AHCHH	5 AHCHJ	6	SE SELIE ISSUED	1831 SAR DE STATE STATE OF THE		
IIIIalea Gallollo	10000	4000					
bstance	diesel	gas	SINDS NEWS TOWNS TO STATE OF THE STATE OF TH				
nk Material	SW STEEL	SW Steel					
nk Install Date	1989	1989	en la signati, sinem production de la	STATE OF THE STATE	musis more	A motete term	
ne Material	SW FRP	SW FRP				and his system	
	S SUCT	S SUCT					
oe Type	1989?	1989?			one shorters are		
verfill Device	ALARM	ALARM					
tonks are monifolds	d which tanks	427					
		427		ompliance	YYes	□ No	
tanks are manifolde Operating Certification Current	ate /	429 ccurate	Posted for delivery drive		Yes	□ No	
Operating Certification	ate	429 ccurate	Posted for delivery drive		Yes	□ No	
Operating Certification Current Operator Training ass A/B Operator	ate Ac	o Name:	Posted for delivery drive	to observe			
Operating Certification Current Operator Training ass A/B Operator Ass C Operator	ate Ac	o Name:	Joseph Clinge Omor Assall	to observe ompliance	Ves		
Current Operator Training ass A/B Operator ass C Operator NA Financial Responsible oe of coverage: verage amount corrections Financial Responsible Operator NA Finan	ate AYes No oility ect: 1/2 M	Name:	Do son Clridge Omor Assal Begin Date: 416 125 Number of tanks covered:	compliance Compliance End C	Wes 4/8/21	□ No	
Current Operator Training ass A/B Operator See of Coverage: Perage amount corrected responsibility could	ate A Yes No Oility ect: 1/2 M d also be in the form o	Name:	Posted for delivery drive to So son Clibre of Assal Sold Sold Sold Sold Sold Sold Sold Sol	compliance Date: Compliance End C	Yes Yes	□ No	
Current Current Current Coperator Training Coperator Training Coperator Cope	Yes No olility A color of the form of	Name:	Posted for delivery drive to So son Clibre of Assal Sold Sold Sold Sold Sold Sold Sold Sol	compliance Compliance End C	Yes Yes Oate: 4/16/	□No 26	

nspector: AADVE Date: 9/19/69 Time:		Compliance	Yes	AND
	Number of s	pill buckets tested?		
Date(s) of testing: None				□No
Ma Spill bucket pass most recent to	vas spill bucket re	placed/repaired?	Yes	
ouring inspection, visual damage to spill bucket?				
Hydrostatic testing (test takes one hour to complete) Vacuum test (test takes 1 minute, ending vacuum must be 26 inches water column or greater)				
Coverfill Prevention		Compliance	Yes	□No
acti. d	1-75			
ate(s) of testing:	0 ~,			
verilli device pass most recent testing.	verfill device rep		□Yes	□No
verfill method that was tested:	per	☐ Ball Float		
verfill Alarm	(Voc	□No		
Alarm sounds when tank is 90% full	Yes V.Yes	□ No		
Driver can see or hear alarm at point of transfer?	Yes	□ No		
Sound alarm from tank gauge during inspection?	41.63			
apper Valve Tasting werified the valve automatically restricts flow at 05%	□Yes	□No		
Testing verified the valve automatically restricts flow at 95% Visual observation of flapper on day of inspection?	Yes	□No		
Il Float Testing verified the ball float automatically restricts flow at 90%	□Yes	□No		
Visual observation of ball float during inspection?	□Yes	□No		
visual observation of ball float during inspection.				15
Corrosion Protection		Compliance	Yes	KNO
Cathodic	ent		1. 10	
eel tank with cathodic?	□Yes	□No	10 recor	de
eel pipes with cathodic?	□Yes	□No		
eel 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?				
impressed current system:	T Voc			
Rectifier Operational?	☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes☐ Yes	□ No □ No		
Rectifier log maintained?	□Yes	□ No		
Rectifier been operating continuously	□ res			
Tank Lining				
Date of lest test?				
Pressure test conducted after tank lining inspection?	□Yes	□ No		

Representative onsite: Melinde Schmidt email: Melinde, Schmidt Baylos Countype of gov	
valedad of fill on w	
compliance Determination: No Violations Observed Observed violations resulting in enforcement Spector Signature: Date: 4 19 24	

Program Enforcement No. 2025-FC-9987



This section for DEQ use only

Department of Environmental Quality Underground Storage Tank Program

Environmental Quality		Field Citati For UST Viola		Page 1 of 3						
	DEQ Information		l	JST Facility Information						
Inspection Date:	08/19/2025		Facility ID#:	6703						
Inspector:	Dave Pardue		Facility Name:	DOUGLAS COUNTY SHOP - SUTHERLIN #4						
DEQ Office:	700 NE Multnomah St		Facility Address:	1212 S Comstock Rd, Sutherlin, Oregon 97479-9374						
Phone #:			County:	Douglas						
Oregon DEQ inspected the facility listed above and identified the UST violations listed on page 3 of this Field Citation.										
Field Citation Issued:	☐ In Person	☑ By Email	☐ Both	Date Issued: 09/05/2025						
Facility Representative Pre	esent During Inspection:	Melinda Schmidt		☐ Permittee ☐ Owner ☐ Other						
Name of Permittee or Owi	ner:	Douglas CO Public	Douglas CO Public Works Dept							
Mailing Address:		2586 NE Diamond	Lake Blvd , Roseburg Ore	egon 97470						
Field Citation Penalty -	- See Page 3 for a detailed	listing of each violat	ion.	\$ 900						
Check one option Option 1 - I ac penalty. Option 2 - I do referred to the	Underground Permittee should select	Storage Tank (US Option 1 or Option by the following DEQ Reven 700 NE Multno Portland, Or red violation(s) ha e in the expedited	T) violations, OAR 340 1 2 below and return a date: 10/15/2025 ue Section mah St. #600 regon 97232 ve occurred, and I am	signed copy of this form to DEQ remitting the listed field citation and understand that my file will be I 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.

Page 2 of 3

	Department of Environmental Quality (DEQ) Underground Storage Tank Program Facility Representa								
			ELD CITATION						
DATE ISSUED: 09/	05/2025	PROGRAM ENFORCEMENT No.: 2025-I	-C-9987	FACILI	ту ID: 6703	Page 3 of 3			
Violation #1: *TCR:	(C1e) Failure to test spill p	revention equipment and/or equipme	nt used for interstitial mo	nitoring of piping	at least once every 3 years.				
Corrective Action:	Submit results of spill bucket t	esting to DEQ by October 15, 2025.							
Rule Citation: OAR 34	40-150-0310(8)(b)	Penalty Amount: \$ 500	Correct Violation by:	10/15/2025	Date Violation Corrected:				
Violation #2: *TCR:		maintain or calibrate RD equipment per rectly installed, is defective, damaged,			rvice checks for operability or rui	nning condition			
Corrective Action:	no additional response require	d.							
Rule Citation: OAR 34	40-150-0400(1)(c)	Penalty Amount: \$ 100	Correct Violation by: n/a		Date Violation Corrected: 09/05/2025				
Violation #3: *TCR:	Failure to maintain records	from the last two 3-year cathodic pro	tection inspections/tests	1					
Corrective Action:	Complete corrosion protection	testing (include spike anodes) and submit	results by October 15, 2025.						
Rule Citation: OAR 34	40-150-0325(6)(b)	Penalty Amount: \$ 300	Correct Violation by:	10/15/2025	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: \$ 900							
	YOU MUST CORRECT	T THE VIOLATIONS AS REQUIRED, ENT	ER THE DATES CORRECTE	D, SIGN THE STA	TEMENT BELOW, AND				
	RETUR	RN THIS FORM TO THE DEQ INSPECTOR	R LISTED ON PAGE 1 ON (OR BEFORE: 10/1	<u>15/2025</u>				
	Re	etain a copy of this form and all docum	entation of corrective act	ions for your reco	ords.				
	I hereby certify that the	UST violations noted above have been o	corrected:		/				
	-		Permittee/Ov	vner Signature	Date				



Oregon Department of Environmental Quality Spill Bucket Integrity Test Form

State of Oregon										
Part Testing of all spill buckets is required at installation and at least once every three years thereafter. Pailed test results must be reported to DEQ. Tanks without functional spill prevention may not receive fuel deliveries. Notify DEQ of any repairs or replacements. Repairs must meet UL2447 & NLPA/ KWA 823 requirements. If using a non-hydrostatic, third-party-approved method, specify the name of the equipment and method. All test water must be disposed of in accordance with local, state and federal requirements.										
	Conducting	Test								
Facility Name Douglas County S	UST Facility Shop Sutherlin	DEQ Facilit		pervisor's Name		DEQ License #				
Physical Address 704 Comstock			UST Ser	vice Provider		DEQ License #				
^{City} Sutherlin	County Douglas		State UST Sup	pervisor's Signature						
UST Permittee Melinda Schmid	dt									
Spill Bucket Testing										
Reason for Test	☐ New Installation	Exi	sting Installation (riannual test)	Release Inve	stigation				
Construction	Single-Walled	☐ Doı	uble-Walled	Spill Bucket Lin	er					
	Hydrostatic (Compl	ete "Test Da	ata" table below)							
Type of Test C	☐ Vacuum (Attach tes	st equipment	t manufacturer's d	ata sheet/test proto	col to this form)					
	Other (Specify equi	pment & me	thod)							
1		EQ Hydro	ostatic Test Pro	ocedure						
Note: Visual dam component(s), do 3. Fill with water to w 4. After 5 minutes ha bucket to the near bucket to the spill bucket: For accurace for the fluid level is the second component of the second	o ensure there are no plow ring is an automatic age is an automatic ocument the repair of ithin 1 ½ inches of to s elapsed, document est 1/16 inch. Eket undisturbed for a cy, the location where the same or it has chadifferent by more than	o cracks, ho matically fa cally failed r replacem p and let sta the initial w t least one h both the initianged by 1/6 n 1/8 inch, th	iles, or broken seriled test. test. Document ent, and retest. and 5 minutes to a rater level measuremour then compartial and final fluid 8 inch or less the he spill bucket fai	als and the fill cap sethe failed test, repeallow water to react rement as measure the starting fluid levels are measure spill bucket passes	h ambient temped from the bot level to the ended should be the	the failed perature. tom of the spill ing level.				
Tank ID (product s	· · · · · · · · · · · · · · · · · · ·		Γ2 UNLEADEΓ							
Type of Spill Bucket	t Tested Single	e-Walled Le-Walled L	Single-Walled Double-Walled	☐ Single-Walled ☐ Double-Walled	Single-Walled Double-Walled					
Test Start Tim	ie 12:37P	'M 1	2:37PM							
Test End Tim	e 1:37PI	M 1	:37PM							
Test Beginning L	evel 9 1/4	7	7 7/8							
Test Ending Le	vel 9 1/4	7	7 7/8							
Test Result (Pass	FASS PASS	F	PASS							
Vacuum Test – Gauç	ge Range		Gauge Units	in WC C	ther:	_				
Comments:										

Cathodic Protection Test Form



Underground Storage Tank Compliance Program

Steel underground storage tank (UST) systems are required to have cathodic protection (CP) systems to prevent corrosion and possible failure of UST system components. These CP systems are required to be inspected and tested at regular intervals to demonstrate they are providing the necessary protection. This report form is intended to provide a format, technical references, and guidelines for adequate performance and documentation of cathodic protection (CP) system testing.

CP System Testing Frequency and Reporting

Oregon Administrative Rule (OAR) 340-150-0325(2), requires inspection and testing of CP systems within six months of installation and at least every three years thereafter. Owners and permittees of UST systems are required to report any failed CP system test results within 24 hours and submit a report of the test results. Passing CP system test results do not need to be reported to the DEQ. However, owners and permittees are required to keep records of CP system tests and must have the last two test results available for review during an inspection. Although only the last two CP test results are required to be kept, DEQ recommends that copies of all CP tests results be maintained for the operating life of the UST system.

CP Testing Standards & References

Oregon rules specify that inspection and testing of CP systems must be done in accordance with the National Association of Corrosion Engineers (NACE RP-0285), "Standard Recommended Practice: Corrosion Control of Underground Storage Tank Systems by Cathodic Protection." In addition, some UST manufacturers have specific procedures described for testing a CP system. For example, the Steel Tank Institute (STI), which manufactures the commonly found STI-P3 tanks, has a recommended practice for CP testing as well as a manufacturer's certification for testing STI tanks.

CP Test Station

Oregon rules also require a permanent CP "test station" be installed or a written CP system test procedure be established. As described in OAR 340-150-0320(3)(d), a CP "test station" must have an electrical connection to the structure (tank and/or pipe) and access for placing a reference cell. A written test procedure must contain sufficient detail to ensure repeatable test procedures.

Steel Tank Integrity Assessment

Of critical importance in designing, installing, and testing of all CP systems is assessing the integrity or condition of the steel tank to be protected. Steel tanks and piping that have had CP systems installed must complete an integrity assessment of the steel tank as described by OAR 340-150-0560. Documentation of the integrity assessment must be kept with the permanent facility records and be available for review at the time of a DEQ inspection.

Protection Of All UST System Components

Oregon Administrative Rule 340-150-0325(1) requires CP for all UST system components that routinely contain product. This includes all stainless steel flex-lines, steel fittings, and steel piping, including those in dispensers and sumps, that may be in contact with soil, backfill material, and water. These steel UST system components must be isolated from the soil, backfill and water or have a CP system installed. CP systems installed to protect these portions of a UST system must be tested just as the CP systems that protect the tank(s).





UST System Modifications & Repairs Notifications

Both 30 & 3 day notices are required to modify a UST system. Modifying a UST system includes installation of a CP system that did not previously exist. For example, installation of spike anodes or ankle bracelets to pipe and/or fittings that did not previously have CP. Another modification example would be installing an impressed current CP system after a galvanic system has failed. An example of a CP system repair would be installing new anodes after failure of existing anodes

UST Supervisor & Service Provider Licenses

Installation, modification, testing, repair and replacement work with CP systems always requires both an Oregon CP Supervisor license and an Oregon Service Provider license. Design of field-installed CP systems must be done by a corrosion expert or engineer with appropriate background in CP system design.

Oregon Department of Environmental Quality Cathodic Protection Test Information Page

UST Owner		UST Facility							
Name: Melinda Schmidt		Name Douglas County Shop - Surtherlin #4 Facility ID#: 6703							
Address: 2586 NE Diamond Lake Blvd		Address: 704 S. Comstock							
City: Roseburg	State OR	City: Sutherlin							
Cathodic Protection Tester									
UST Supervisor Name Terry McRoberts		Oregon UST Supervisor license#26976							
UST Service Provider Pump Pipe & Tank Se	rvices	Exp. Date: 10-14-2026							
Address: PO Box 146		Phone: 541-535-6542							
^{City:} Talent	State OR	NACE Cert. #: N/A							
Cathodic protection system is: (check √ one) [√ Ga	Ivanic [] Impress	ed current Date Last Tested: Unknown							
Weather Conditions at Time of Testing/Inspection:	lear, warm								
Temperature: 76 Soil/Backfill Conditions (check √):☑ moist ☐ dry ☐	sand ☐ gravel ☑ soil Describe soil: Typ Backfill							
Cathodic Protection System Certificati	on								
□ Test required within 6 months of installation of CP system (installation date was) □ Test required at least every 3 years after installation/test noted above □ 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 Terry McRobert	z Date 8-19	9-2025							

	UST SYSTEM INFORMATION												
TANK#	YR TANK INSTALLED	CAPACITY	TANK MATERIAL	LINED? Y/N Date	YR CP INSTALLED	PIPING MATERIAL	YR CP INSTALLED						
1 D/F		10,000	Steel	?		FG							
2 Unl		4,000	Steel	?		FG							

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.

		IMPRE	SSED CU	RRE	NT (CP T	ES	ST RESU	LTS REF	PORT F	AGE	
					RE	ECTIF	IEF	R DATA				
REC	ΠFIER	MANUFA	CTURER:				R	ATED DC O	UTPUT:	VOLT	S AN	/IPS
REC	ΓIFIER	MODEL:					RI	ECTIFIER S	ERIAL NUI	MBER:		
RECT AMPS		OUTPUT	AS INITIALI	Y DE	SIGN	ED O	RL	AST RECO	MMENDED) (if availa	able): V	OLTS
	TAP SETTINGS DC OUTPUT HOUR					00141451						
		DATE	Coarse	Fine	;	Volt	s	AMPS	METER			NIS
"As F	ound"											
"As L	eft"											
			STRUCT	JRE T	o so	IL PC	OTE	NTIAL MEA	SUREME	NTS		
	ОТВ	HOTHER	CONTACT D	OINT		EDENO	\F_0	ELL LOCATION		INSTANT	100MV	
ID	SIR	UCTURE	CONTACT P	OINI	KEF	EKENC	ECI	ELL LOCATION	ON	OFF	NATIVE	CHANGE
				CP TE	ST S1	ΓΑΤΙΟ) N	REQUIREM	ENTS		<u> </u>	
Have p	revious te	st records bee	en reviewed?	Yes 🗆	l No			Is this CP test	consistent with	previous tes	ts? 🗆 Yes	□ No
			ed since last test,									
Have p	otential m	easurements	been made at all	tanks a	nd pipin	g includ	ding a	any buried flex-co	onnectors?	Yes 🗆	No	
С	OMPLI	ETE IF AN	IY REPAIRS	SOR				NS TO THE SARY	CP SYSTI	M ARE	MADE OF	RARE

Facility Name______Test Date_____Facility #_____

GALVANIC (SACRIFICIAL) CP TEST RESULTS REPORT PAGE								
STRUCTURE TO SOIL POTENTIAL MEASUREMENTS								
ID	STRUCTURE	CONTACT POINT	REFERE	ENCE CELL LOCATION	mV	COMMENTS		
D/F R1	Steel UST	Probe Riser	Tank Top Soils		-1.003	Pass		
D/F R2	Steel UST	Probe Riser	West Parking Lot Remote		-0.996	Pass		
R/U R3	Steel UST	Probe Riser	Tank Top Soils		-1.077	Pass		
R/U R4	Steel UST	Probe Riser	West Parking Lot Remote		-0.953	Pass		
		CP TEST S	STATION	REQUIREMENTS				
Have previous CP system test records been reviewed? ☐ Yes ☑ No				Has this CP test been performed consistent with previous CP system tests? Yes No				
If test p	procedures have changed	since last test, please expla	in:					
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
Describe any repairs or modifications to the cathodic protection system that are made or are necessary.

Non-discrimination statement

DEQ does not discriminate on the basis of race, color, national origin, disability, age, sex, religion, sexual orientation, gender identity, or marital status in the administration of its programs and activities. Visit DEQ's Civil Rights and Environmental Justice page.



Re: Results of Full Compliance Inspection 1212 S Comstock Facil 6703

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

Date Wed 10/15/2025 10:29 AM

To UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>; Melinda D. Schmidt <melinda.schmidt@douglascountyor.gov>

Good morning,

I see that payment of the penalty was processed on 10/14/25. The UST inspection for DEQ facility 6703 Douglas County Shop - Sutherlin #4 located at 1212 S Comstock is officially CLOSED and COMPLETE.

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



Emily Litke (she/her)

Duty Officer, Underground Storage Tanks

DEQ Headquarters, Land Quality Division

700 NE Multnomah Street, Suite 600

Portland OR 97232-4100

503-806-9516

Emily.LITKE@deq.oregon.gov

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

Sent: Tuesday, September 30, 2025 12:36 PM

To: Melinda D. Schmidt < melinda.schmidt@douglascountyor.gov >

Subject: Re: Results of Full Compliance Inspection 1212 S Comstock Facil 6703

Thank you for sending these reports - they both look great. I will mark the corrective actions COMPLETE.

As soon as payment of the \$900 penalty is received by the DEQ, then this UST inspection can be closed - deadline 10/15/25.

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 -



Thank you, Melinda 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: Melinda D. Schmidt < melinda.schmidt@douglascountyor.gov >

Sent: Thursday, September 25, 2025 6:31 AM

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

Subject: RE: Results of Full Compliance Inspection 1212 S Comstock Facil 6703

Please see attached corrected violations.



Douglas County Fleet Services | 2586 NE Diamond Lake Blvd. | Roseburg, OR 97470 Phone: 541-440-6039 | Fax: 541-440-4257 | Email: Melinda.Schmidt@douglascountyor.gov

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

Sent: Friday, September 5, 2025 5:29 PM

To: Melinda D. Schmidt <melinda.schmidt@douglascountyor.gov> **Cc:** UST Duty Officer * DEQ <UST.DutyOfficer@DEQ.oregon.gov>

Subject: Re: Results of Full Compliance Inspection 1212 S Comstock Facil 6703

You don't often get email from <u>ust.dutyofficer@deq.oregon.gov</u>. <u>Learn why this is important</u> Good afternoon,

Please review the attached field citation. The deadline for payment of the \$900 penalty and completion of the corrective actions is 10/15/25.

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.

<u>Department of Environmental Quality: Welcome to Your DEQ Online: Online Services: State of Oregon</u>

<u>PaymentsforEEOs.pdf</u> – 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

From: PARDUE Dave * DEQ < <u>Dave.PARDUE@deq.oregon.gov</u>>

Sent: Thursday, September 4, 2025 10:30 AM

To: melinda.schmidt@douglascountyor.gov < melinda.schmidt@douglascountyor.gov >

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

Subject: Results of Full Compliance Inspection 1212 S Comstock Facil 6703

Hello Melinda Schmidt-

Thank you for facilitating my inspection of your facility on August 19, 2025. I appreciate your assisting with the inspection by opening the sumps/equipment for visual observation.

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

Equipment (at the time of inspection) appeared to be clean and in good order.

Documentation

- 1. No records of Spill Prevention testing were available.
- 2. Annual Release Detection Operability Testing was not performed/records retained for 2024.
- 3. Corrosion Protection Testing records are not available.

This email has two intended recipients: you (permittee) and our enforcement/follow-up team. Because of this split audience, there might be some jargon used which is for DEQ internal purposes. I'll be asking for paperwork/documentation by a specific time; see below for the violation/corrective action.

Alleged Violations:

- 1. Failure to test spill prevention equipment at least once every 3 years. 340-150-0310(8)(b). C1e.
- 2. Failure to perform Annual Release Detection Operability Testing (no records from 2024) 340-150-0400(2). G5.
- 3. Failure to maintain records from the last two 3-year cathodic protection tests. 340-150-0325(6)(b). D9a.

Corrective Action- begin immediately.

- 1. Submit results of spill bucket testing to DEQ by October 15, 2025.
- 2. No specific corrective action- continue to test annually- maintain records.
- 3. Complete corrosion protection testing (include spike anodes) and submit results by October 15, 2025.

Next Steps –
Please direct your responses to ust.dutyofficer@deq.oregon.gov . DO NOT SEND RECORDS TO ME. This team will work with me on documents you submit or corrective actions completed to ensure the work is sufficient to close the inspection.
These violations will fit into the field citation guidance and that team will issue enforcement based off a preset calculation matrix.
Regards,
Dave
Dave Pardue
UST Program Coordinator and Inspector
503-360-4287

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

YDO is now live for the UST Program- Set up your account here: https://www.oregon.gov/deq/permits/Pages/UST-in-YDO.aspx

To manage your account and link facilities see this link:

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

