



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5696

FAX (503) 229-6124

TTY 711

July 8, 2025

City of Portland
Attn: Michael Roy
2835 N Kerby Ave
Portland, OR 97227

RE: UST Compliance Inspection
DEQ UST#1542 -1850 N Interstate Ave
DEQ UST#6482 - 2835 N Kerby Ave
DEQ UST#4646 – 6437 SE Division St
DEQ UST#3003 – 4735 E Burnside St
DEQ UST# 2233 – 1221 SW 1st Ave

Dear City of Portland:

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

The inspection for this facility is scheduled for August 13 and 14, 2025, starting at approximately 9 am at the DEQ UST # listed below. Please confirm receipt of this notification.

August 13th

DEQ UST #1542 - 1850 N INTERSTATE AVE, PORTLAND, OR 97227 at 9 am

DEQ UST #6482 - 2835 N Kerby Ave, Portland, OR 97227-1610

August 14th

DEQ UST #4646 - 6437 SE DIVISION ST, PORTLAND, OR 97206 at 9 am

DEQ UST #3003 - 4735 E BURNSIDE, PORTLAND, OR 97215

DEQ UST #2233 - 1221 SW 1ST AVE, PORTLAND, OR 97204

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.

DEQ staff will not assist with operating tank gauges or the opening of sumps and dispensers.

The DEQ requests the following documentation be submitted electronically prior to the inspection:

- Line and leak detector testing results for the past three years,
- Monthly tank leak detection records, one year's worth

- Class A, B, and C training documentation,
- Financial responsibility mechanism,
- Annual tank gauge certification, last three years
- Last two tests of Spill prevention testing records, was due to start testing in 2020
- Monthly walkthroughs,
- Last two tests of Overfill Prevention Equipment testing, was due to start testing in 2020
- Cathodic protection testing (if applicable).

Please submit these records to ingrid.gaffney@deq.oregon.gov for review. If these records cannot be submitted prior to the inspection, please have them available for review at the facility.

Owners must also be able to operate the tank gauge and print out applicable reports such as the tank setup and in-tank alarm reports. Owners also must be able to sound high fill over alarm from the tank gauge, if applicable.

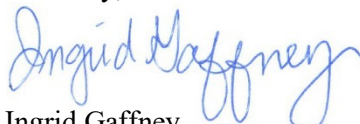
DEQ will not touch any equipment, if you are unable to assist with equipment access, please have your UST Service Provider there. DEQ will need to observe what equipment is in the tank top sumps and under the dispensers. If ball floats are the primary overfill protection device, these will need to be 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 503-229-5048 ingrid.gaffney@deq.oregon.gov to answer any questions you may have and assist you in the preparation for your inspection.

Sincerely,



Ingrid Gaffney
UST Compliance Specialist
Northwest Region

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

*ps
sems*

Inspector: Ingrid Gaffney

Date: 8/13/ 2025

Time: 9 AM

Facility: 1542

I. Site Information

Facility Name: <u>Fleet Management Repair Facility</u>	Permittee: <u>City of Portland</u>	Contact: <u>Lei Peralta</u>
Site Address: <u>1850 N Interstate Ave</u>	Organization:	Phone:
City: <u>Portland, OR 97227</u>	Phone:	<u>971-421-1939</u>

II. Tank Information

DEQ Permit #	<u>BHFC D</u>	<u>BHFC E</u>	<u>BHFC F</u>	<u>BHFC G</u>	
Estimated Gallons	<u>8600</u>	<u>12000</u>	<u>8000</u>	<u>7000</u>	
Substance	<u>GASOLINE</u>	<u>GASOLINE</u>	<u>DIESEL</u>	<u>DIESEL</u>	
Tank Material	<u>XERXES</u>				
Tank Install Date	<u>5/11/2020</u>				
Pipe Material	<u>DW 90 Smith</u>				
Pipe Type	<u>Pressure</u>				
Pipe Install Date	<u>5/11/2020</u>				
Overfill Device	<u>Alarm</u>				

Notes and Comments from the UST database:

☒ Check file before conducting inspection

New 2020 install

If tanks are manifolded, which tanks:

III. Operating Certificate

Compliance ☒ Yes ☐ No

☒ Current ☒ Accurate ☒ Posted for delivery drive to observe

IV. Operator Training

Compliance ☒ Yes ☐ No

Class A/B Operator ☒ Yes ☐ No

Name: Makilei Peralta

Date: 3/11/25

Class C Operator ☐ Yes ☐ No ☒ Cardlock

V. Financial Responsibility

Compliance ☒ Yes ☐ No

Type of coverage: City Government

Begin Date: 8/22/23

End Date: 6/15/33

Coverage amount correct: CFO letter - yes

Number of tanks covered: 4

Financial responsibility could also be in the form of self insurance, bonds, local government, trust fund, and or guarantee

VI. Walkthrough Requirements

Compliance ☒ Yes ☐ No

Spill prevention and release detection equipment checked monthly?

☒ Yes ☐ No

Tank top sumps checked annually?

☒ Yes ☐ No

VII. Release Detection

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

Date of last testing: 12/19/24 12/19/23 Last three tests available? ☒ Yes ☐ No
12/30/22

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: 12/19/24 12/19/23 Last three tests available? ☒ Yes ☐ No
12/30/22

Number of lines tested: 4 Number of LD tested: 4

Leak detector manufacturer make and model: LD 2000

Tank gauge manufacturer make and model: Veeder Root TLS 450

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: du 2/2025 2/3/22 Last two tests available? ☐ Yes ☒ No

Date of last sensor testing: 12/19/24 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

Annual Sensor + *

Tank release detection records available during inspection

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
T1:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
T2:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
T3:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
T4:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
T5:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Inspector: _____

Date: _____

Time: _____

Facility: 1542**VIII. Spill Prevention**

Compliance

☒ Yes☐ NoDate(s) of testing: 12/21/23Number of spill buckets tested? 4Did spill bucket pass most recent testing? ☒ Yes☐ NoIf no, was spill bucket replaced/repaired? ☐ Yes☐ NoDuring inspection, visual damage to spill bucket? ☐ Yes☐ No☐ Hydrostatic testing (test takes one hour to complete)☐ Vacuum test (test takes 1 minute, ending vacuum must be 26 inches water column or greater)**IX. Overfill Prevention**

Compliance

☒ Yes☐ NoDate(s) of testing: 12/21/23new install 2020Overfill device pass most recent testing? ☐ Yes☐ NoIf no, overfill device replaced? ☐ Yes☐ NoOverfill method that was tested: ☐ Alarm☐ Flapper☐ Ball FloatOverfill AlarmAlarm sounds when tank is 90% full ☒ Yes☐ NoDriver can see or hear alarm at point of transfer? ☒ Yes☐ NoSound alarm from tank gauge during inspection? ☒ Yes☐ NoFlapper ValveTesting verified the valve automatically restricts flow at 95% ☐ Yes☐ NoVisual observation of flapper on day of inspection? ☐ Yes☐ NoBall FloatTesting verified the ball float automatically restricts flow at 90% ☐ Yes☐ NoVisual observation of ball float during inspection? ☐ Yes☐ No**X. Corrosion Protection**

Compliance

☐ Yes☐ No☐ Cathodic☐ Galvanic☐ Impressed CurrentSteel tank with cathodic? ☐ Yes☐ NoSteel pipes with cathodic? ☐ Yes☐ NoSteel flex-lines with cathodic? ☐ Yes☐ No

Date of cathodic test: _____

Last two tests available? ☐ Yes☐ NoDid last test pass? ☐ Yes☐ No

If not:

Was failed test reported to DEQ? ☐ Yes☐ NoWas 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☐ NoRectifier log maintained? ☐ Yes☐ NoRectifier been operating continuously ☐ Yes☐ No☐ Tank Lining

Date of last test? _____

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

XI. General notes from inspection

Representative onsite: Lei Peralta email: maKiileiperalta@
Mike Driggs NWT portland.oregon.gov

violation

~~no~~ sump udc testing was due 2/2025

Compliance Determination:

☐ No Violations Observed

☒ Observed violations resulting in enforcement

Inspector Signature: David Maggner

Date: 8/13/25



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY

INSPECTION PHOTOLOG

FACILITY NAME: Fleet Management Repair Facility #1542 Page 1

INSPECTION DATE: August 13, 2025



1: 1850 N Interstate Ave, Portland, OR 97227



2: Vents for tanks



INSPECTION PHOTOLOG

INSPECTION DATE: August 13, 2025



3: Tank nest looking north



4: Diesel fill



INSPECTION PHOTOLOG

INSPECTION DATE: August 13, 2025



5: Diesel vapor return



6: Diesel sump



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
INSPECTION PHOTOLOG

FACILITY NAME: Fleet Management Repair Facility #1542 Page 1

INSPECTION DATE: August 13, 2025



7: Diesel fill



8: Vapor return on diesel



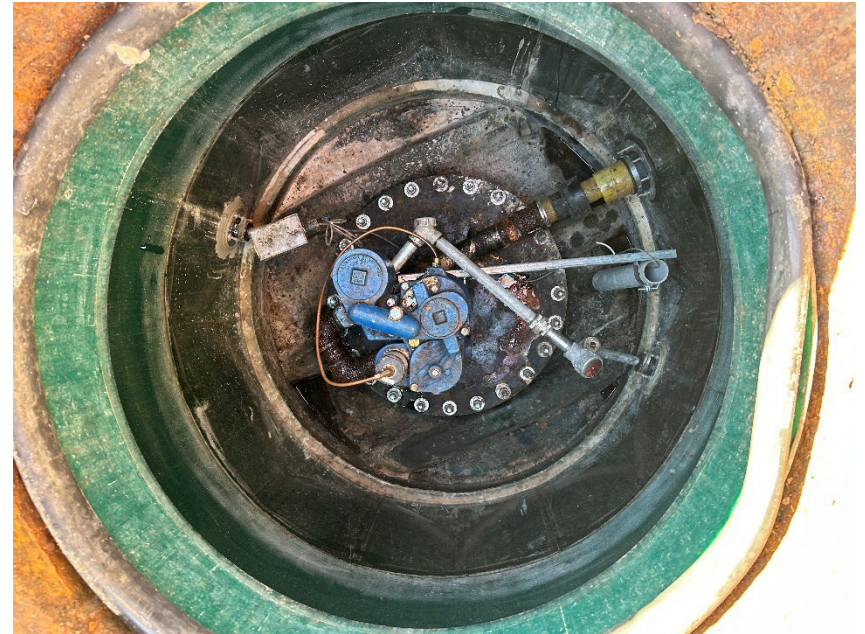
9: Diesel sump



10: Regular fill



11: Regular vapor return



12: Regular sump



INSPECTION PHOTOLOG

INSPECTION DATE: August 13, 2025



13: Regular sump



14: Def sump with sensor



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
INSPECTION PHOTOLOG

FACILITY NAME: Fleet Management Repair Facility #1542 Page 1

INSPECTION DATE: August 13, 2025



15: UDC #1/2



16: UDC #3/4



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
INSPECTION PHOTOLOG

FACILITY NAME: Fleet Management Repair Facility #1542 Page 1

INSPECTION DATE: August 13, 2025



17: UDC #5/6



18: Def fill



State of Oregon
Department of
Environmental
Quality

Program Enforcement No. 2025-FC-9975

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#:	1542
Inspector:	Ingrid GAFFNEY	Facility Name:	FLEET MANAGEMENT REPAIR FACILITY
DEQ Office:	700 NE Multnomah St Ste 600	Facility Address:	1850 N INTERSTATE AVE, PORTLAND, Oregon 97227
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.				\$ 500

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-9975

FACILITY ID: 1542

Page 3 of 3

Violation #1:	Failure to test spill prevention equipment at least once every 3 years		
*TCR:			
Corrective Action:	Complete testing of sumps and UDCs within 30 days. Maintain records and submit compliance testing results to DEQ by September 22, 2025		
Rule Citation: OAR 340-150-0310(8)(b)	Penalty Amount: \$ 500	Correct Violation by: 09/22/2025	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 500 (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



PO BOX 883
Sherwood, OR 97140
888-TLC-TANK
www.NWTLI.com
Since 1959

September 9, 2025

City of Portland
Attn: Lei Peralta

Subject Site: City of Portland
1850 N Interstate Ave, Portland, OR, 97227

This cover letter summarizes the attached results of the test(s) performed at the subject site.

Test Summary					
Tests Performed On: September 9, 2025					
Test Performed	Result	Test Performed	Result	Test Performed	Result
<u>Spill Bucket Test</u>		<u>Containment Test</u>		<u>Containment Test</u>	
T2	Pass	T2 Tanktop	Pass	Diesel Disp	Pass
T3	Pass	T3 Tanktop	Pass	Unlead Disp	Pass
T4	Pass	T4 Tanktop	Pass		
T5	Pass	T5 Tanktop	Pass		

Limitations:

The results for the test(s) are valid only for the specific operating conditions of the test method, and apply only to the condition of the subject tank/line at the time of the test. NWTLI does not express or imply any past or future responsibility as the condition of the tank system. Furthermore, NWTLI is not responsible for any on-going leakage below the limits of the accuracy of the test methods.

Record Keeping:

Local, State and Federal regulations may have specific record keeping and reporting requirements for compliance testing reports.


Thank you for the opportunity to provide you service. Any questions or comments regarding this report, please contact us at testing@NWTLI.com

Sincerely,
Michael Driggs
NWTLI - Director of Testing & Compliance



Spill Bucket Integrity Test Form

<ul style="list-style-type: none">➤ Testing of all spill buckets is required at installation and at least once every three years thereafter.➤ Failed 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 & NLP/ 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.	Date of Test 9/9/25
---	-----------------------------------

UST Facility			Person Conducting Test	
Facility Name City of Portland - Interstate	DEQ Facility ID #		UST Supervisor's Name Michael Driggs	DEQ License # 27762
Physical Address 1850 N Interstate Ave			UST Service Provider NWTLI	DEQ License # 26252
City Portland	County Multnomah	State OR	UST Supervisor's Signature 	
UST Permittee				

Spill Bucket Testing	
Reason for Test	<input type="checkbox"/> New Installation <input checked="" type="checkbox"/> Existing Installation (triannual test) <input type="checkbox"/> Release Investigation
Construction	<input type="checkbox"/> Single-Walled <input checked="" type="checkbox"/> Double-Walled <input type="checkbox"/> Spill Bucket Liner
Type of Test	<input type="checkbox"/> Hydrostatic (Complete "Test Data" table below)
	<input checked="" type="checkbox"/> Vacuum (Attach test equipment manufacturer's data sheet/test protocol to this form)
	<input type="checkbox"/> Other (Specify equipment & method)

DEQ Hydrostatic Test Procedure

- Clean out and properly dispose of all debris, soil and/or fluids from the spill bucket.
- Visually examine to ensure there are no cracks, holes, or broken seals and the fill cap seals properly. **Separation of the bucket from the plow ring is an automatically failed test.**
Note: Visual damage is an automatically failed test. Document the failed test, repair or replace the failed component(s), document the repair or replacement, and retest.
- Fill with water to within 1 ½ inches of top and let stand 5 minutes to allow water to reach ambient temperature.
- After 5 minutes has elapsed, document the initial water level measurement as measured from the bottom of the spill bucket to the nearest 1/16 inch.
- Leave the spill bucket undisturbed for at least one hour then compare the starting fluid level to the ending level.
Note: For accuracy, the location where both the initial and final fluid levels are measured should be the same.
- If the fluid level is the same or it has changed by 1/8 inch or less the spill bucket passes the test.
- If the fluid level is different by more than 1/8 inch, the spill bucket fails the test.
- Properly dispose of all test fluids at the conclusion of testing.

Test Data					
Tank ID (product stored)	2	3	4	5	
Type of Spill Bucket Tested	<input type="checkbox"/> Single-Walled <input checked="" type="checkbox"/> Double-Walled	<input type="checkbox"/> Single-Walled <input checked="" type="checkbox"/> Double-Walled	<input type="checkbox"/> Single-Walled <input checked="" type="checkbox"/> Double-Walled	<input type="checkbox"/> Single-Walled <input checked="" type="checkbox"/> Double-Walled	<input type="checkbox"/> Single-Walled <input type="checkbox"/> Double-Walled
Test Start Time	7:18	7:12	7:25	7:21	
Test End Time	7:19	7:13	7:26	7:22	
Test Beginning Level	-30.0	-30.0	-30.0	-30.1	
Test Ending Level	-28.9	-28.3	-29.4	-29.2	
Test Result (Pass/Fail)	PASS	PASS	PASS	PASS	
Vacuum Test – Gauge Range	Gauge Units		<input type="checkbox"/> in WC <input checked="" type="checkbox"/> Other: inHg		

Comments:



Containment Sump Testing Form

- Testing of all containment sumps used for interstitial monitoring is required at installation and at least once every three years thereafter.
- Failed test results must be reported to DEQ within 72 hours, and may require an investigation of a suspected release.
- You must notify DEQ of any repairs or replacements. Repairs must meet UL2447 & NLPA/ KWA Standard 823 requirements.
- All test water shall be disposed of in accordance with local, state and federal requirements.
- If using a third-party-approved method, instead of the hydrostatic method described below, specify the name of the equipment and method.

UST FACILITY

Permittee Name	Facility Name City of Portland - Interstate	Facility ID#:
Street Address 1850 N Interstate Ave	City Portland	

CONTRACTOR/PERSON CONDUCTING INSPECTIONS

UST Service Provider Name NWTLI	DEQ License # 26252
UST Supervisor Name Michael Driggs	DEQ License # 27762

I certify, under penalty of law, that the testing data provided on this form accurately documents the UST system equipment was checked in accordance with the manufacturer's guidelines and the applicable national industry standards.

Michael Driggs		9/9/2025
Print Name of person conducting inspection	Signature of person conducting inspection	Inspection Date

DEQ Hydrostatic Test Procedure

- Clean out and properly dispose of all debris, soil and/or fluids from the containment sump.
- Visually examine to ensure there are no cracks, holes, or broken seals.
Note: Visual damage is an automatically failed test. Document the failed test, repair or replace the failed component(s), document the repair or replacement, and retest.
- Fill with water to 4" above the highest seam or penetration and let stand 15 minutes to allow water to settle.
- After 15 minutes has elapsed, document the initial water level measurement as measured from the bottom of the containment sump to the nearest 1/16 inch.
- Leave the containment sump undisturbed for at least one hour then compare the starting fluid level to the ending level.
Note: For accuracy, the location from the bottom of the sump where both the initial and final fluid levels are measured must be the same.
- If the fluid level is the same or it has changed by 1/8 inch or less, containment sump passes the test.
- If the fluid level is different by more than 1/8 inch, the containment sump fails the test.
- Remove test liquid from containment sump, replace sensors at lowest point in sump, affixed to stable structure, open communication of piping secondary with containment sump.

TEST RESULTS

Third party-approved method (if applicable)							
Sump Location (Ex: RUL STP, Disp 1/2)	T2 Tanktop	T3 Tanktop	T4 Tanktop	T5 Tanktop	Diesel Disp	Unlead Disp	
1. Indicate whether sump uses low-level sump procedures to comply with interstitial monitoring requirements.	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>
2. Liquid and debris removed; sump wiped clean prior to test?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>

Visual inspection includes inspection of all seals, gaskets, side walls, test boots and penetrations.
If cracks, loose parts or separation of the containment sump is found, the sump fails the visual inspection.
Do not introduce water if the sump fails the visual inspection.

3. Water Level is a minimum of 4" above the highest penetration fitting or seam?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>
4. Sensor is positioned in the lowest portion of the sump?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>
Sump Location (Ex: RUL STP, Disp 1/2)	T2 Tanktop	T3 Tanktop	T4 Tanktop	T5 Tanktop	Diesel Disp	Unlead Disp	
5. Sensor generates an audible/visual alarm?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>
6. Sensor triggers appropriate positive shutdown as required by Division?	YES <input type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>
7. Starting Water Level (inches)	32 7/8	33 1/4	33 5/8	34 1/2	17 1/4	17 3/8	
8. Test Start Time (AM/PM)	7:28	7:31	8:50	8:55	10:01	10:09	
9. Ending Water Level (inches)	32 7/8	33 1/4	33 5/8	34 1/2	17 1/4	17 3/8	
10. Test End Time (AM/PM)	8:28	8:31	9:50	9:55	11:01	11:09	
11. Test Period (Minimum Test Time 1 hour)	1hr	1hr	1hr	1hr	1hr	1hr	
12. Test Results? (PASS/FAIL)	PASS	PASS	PASS	PASS	PASS	PASS	
For a passing test result, each sump must pass a visual inspection and have a water level change of less than 1/8 inch in 1 hour.							
AFTER TEST STEPS							
13. Measuring device removed from sump?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>
14. Removed all test water from the sump?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>
15. Sensor is positioned in lowest point of the sump?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>
16. Secondary piping test boots or valve cores returned to open position?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>
17. Secure all sump lids, manhole covers or dispenser doors?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>
18. Does the test liquid contain any visible product or sheen?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>
19. Has the test liquid been properly characterized?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>
20. Method of Test Water Management / Disposal?	<input type="checkbox"/> Private <input type="checkbox"/> Recycler or Treatment Facility		<input type="checkbox"/> Public Owned <input type="checkbox"/> Treatment Works		<input checked="" type="checkbox"/> Waste Hauler		<input type="checkbox"/> Other _____ Describe

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



Lei Peralta (she/her)

Fuel & Energy Program Coordinator

Bureau of Fleet & Facilities, **CityFleet**

makiilei.peralta@portlandoregon.gov

d: 503-823-1816 | c: 971-421-1939

www.portland.gov

[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: Fleet Management Repair Facility #1542

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

Date Wed 10/8/2025 9:06 AM

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

Thank you for sending the testing reports and updates - everything looks great.

The UST inspection for **DEQ facility 1542 Fleet Management Repair Facility located at 1850 N Interstate Ave Portland, OR** is officially CLOSED and COMPLETE.

Thank you for your 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: Wednesday, October 1, 2025 7:01 PM

To: 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: Fleet Management Repair Facility #1542

Good afternoon,

UST facility 1542 Fleet Management Repair Facility located at 1850 N Interstate Ave Portland, OR

Please provide an update on the sump and UDC hydrostatic testing. As a reminder the service provider needs to submit their reports through Your DEQ Online as well.

Corrective Actions:

1. Complete testing of sumps and UDCs within 30 days. Maintain records and submit compliance testing results to DEQ by September 22, 2025



Emily Litke (she/her)

Duty Officer, Underground Storage Tanks

DEQ Headquarters, Land Quality Division

700 NE Multnomah Street, Suite 600

Portland OR 97232-4100

503-806-9516

Emily.LITKE@deq.oregon.gov

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

Sent: Friday, August 22, 2025 4:33 PM

To: 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: Fleet Management Repair Facility #1542

Good afternoon,

UST facility 1542 Fleet Management Repair Facility located at 1850 N Interstate Ave Portland, OR

Please review the attached field citation. **The deadline for payment of the \$500 penalty and completion of the corrective action is 9/22/25.**

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 9:14 AM

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

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

Subject: RE: Oregon DEQ UST Inspection Determination: Fleet Management Repair Facility #1542

Hi All

I made an error! Sorry!

Corrective Actions:

1. **Complete testing of sumps and UDCs within 30 days.** Maintain records and submit compliance testing results to DEQ by **September 22, 2025 via the UST Duty officer email: ust.dutyofficer@deq.oregon.gov** (Service provider will submit online too, via YDO)

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

From: GAFFNEY Ingrid * DEQ

Sent: Friday, August 22, 2025 8:57 AM

To: makiilei.peralta@portlandoregon.gov

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

Subject: Oregon DEQ UST Inspection Determination: Fleet Management Repair Facility #1542

Importance: High

Hello Lei (City of Portland):

Thank you for meeting with DEQ to perform the inspection at 1850 N Interstate Ave, Portland, OR 97204 on August 13, 2025. Thank you for having Mike Driggs from NWTs present to preform 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. C1e – Failure to conduct the most recent 3-year spill prevention equipment test. Last test was performed February 2nd, 2022. Due February 2025. **OAR 340-150-0310(8)9b) 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 **September 22, 2025 via the UST Duty officer email: ust.dutyofficer@deq.oregon.gov (Service provider will submit online too, via YDO)**

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

\$ 500.00

—

Paid

\$ 500.00

=

Due

\$ 0.00

Penalty

▶ 2025-fc-9975

UST - Field Citation

\$ 500.00

1 Results

Add Penalty

Send to FIMS

Payment

Credit Card

8/27/2025

8/27/2025

DEQEDM000059230

\$ 500.00

Type	Amount
Credit Card	500

E-Payment Confirmation#

DEQEDM000059230

E-Payment Settle Date

08/27/2025

Ref#

Payment Date


08/27/2025

Comments

(Remaining Length: 4000)

Site Info

FLEET MANAGEMENT REPAIR FACILITY



1850 N INTERSTATE AVE, PORTLAND, OR 97227

6000 ✓

200450

CEM_FacilityIdentifier=18986 UST (1542)

Stationary

Inspection Info

10574 Completed

UST

Full Compliance Inspection (FCI) TCR only

Start Date 8/13/2025

End Date 8/13/2025

Created & Updated Info