



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Headquarters Office

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

TTY 711

August 5, 2025

Rajiv Kumar
H&N Petroleum, LLC
805 Park St
Lebanon, OR 97355

RE: UST Compliance Inspection
DEQ UST # 9194
Lebanon Fast Gas

Rajiv Kumar:

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 this facility, located at 1550 S. Main St in Lebanon, is scheduled for September 3, 2025, starting at approximately 11:00 am. We will go there immediately after the previous inspection at H&N Chevron. Please note that the inspection will require uninterrupted participation and attendance by you or a knowledgeable assistant. For the inspection, you will 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 inspection or sent to me prior to the inspection at diana.foss@deq.oregon.gov. If the records are not available before or during the inspection, the 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 back to the most recent DEQ inspection
- Overfill Prevention Equipment testing back to the most recent DEQ inspection
- 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 503-869.0770 or diana.foss@deq.oregon.gov to answer any questions you may have and assist you in the preparation for your inspection.

Sincerely,

Diana Foss

Diana Foss
Senior Policy Analyst
UST Compliance

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

Inspector: Foss Date: 9/3/25 Time: _____ Facility: 9194

I. Site Information		
Facility Name: <u>Lebanon Fast Gas</u>	Permittee: <u>Rajiv Kumar</u>	Contact
Site Address: <u>1550 S Main</u>	Organization: <u>Amal Petroleum</u>	Phone
City: <u>Lebanon</u>	Phone:	

II. Tank Information					
DEQ Permit #	<u>BFA55</u>	<u>BFBKK</u>	<u>BHAKB</u>	<u>BHAKC</u>	
Estimated Gallons	<u>14k</u>	<u>6k</u>	<u>6k</u>	<u>6k</u>	
Substance	<u>gas</u>	<u>die</u>	<u>gas</u>	<u>die</u>	
Tank Material	<u>composite</u>	_____ →			
Tank Install Date	<u>1999</u>	_____ → <u>2021</u>		<u>2021</u>	
Pipe Material	<u>flex</u>	_____ →			
Pipe Type					
Pipe Install Date					
Overfill Device	<u>alarm</u>	_____ →			

Notes and Comments from the UST database: Check file before conducting inspection

If tanks are manifolded, which tanks:

III. Operating Certificate		Compliance	
<input type="checkbox"/> Current	<input checked="" type="checkbox"/> Accurate	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
		<input type="checkbox"/> Posted for delivery drive to observe	

IV. Operator Training		Compliance	
Class A/B Operator <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Name: <u>Rajiv Kumar</u>	Date: <u>8/26/10</u>	<input type="checkbox"/> No
Class C Operator <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Cardlock		

V. Financial Responsibility		Compliance	
Type of coverage: <u>insurance</u>	Begin Date: <u>12/31/24</u>	End Date: <u>12/31/25</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Coverage amount correct: <u>yr</u>	Number of tanks covered: <u>4</u>		

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

VI. Walkthrough Requirements		Compliance	
Spill prevention and release detection equipment checked monthly?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Tank top sumps checked annually?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

VII. Release Detection

Compliance

Yes No

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

Date of last testing: 8/6/25 8/23/24 1/3/23 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: _____ Last three tests available? Yes No

Number of lines tested: _____ Number of LD tested: _____

Leak detector manufacturer make and model: _____

Tank gauge manufacturer make and model: _____

MLLD on turbine manifold? Yes No

MLLD product appropriate? (Example, diesel Red Jacket FX series on diesel system?) Yes No

If ELLD and no line testing: Annual 0.1 gph results from tank gauge? Yes No

Interstitial Monitoring

[Monthly records must include, date system was checked, observations made, initials of person checking. Electronic records must include power status (on or off), alarm indication status (yes or no) and sensor malfunction notes (yes or no).]

Date of last sump testing: _____ *NO sump test* Last two tests available? Yes No

Date of last sensor testing: 8/6/24 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

fail

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

2x 24

Tank release detection records available during inspection

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

VIII. Spill Prevention Compliance Yes No

Date(s) of testing: _____ *no spill* Number of spill buckets tested? _____

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

During inspection, visual damage to spill bucket? Yes No

Hydrostatic testing (test takes one hour to complete)

Vacuum test (test takes 1 minute, ending vacuum must be 26 inches water column or greater)

IX. Overfill Prevention Compliance Yes No

Date(s) of testing: 8/6/25

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

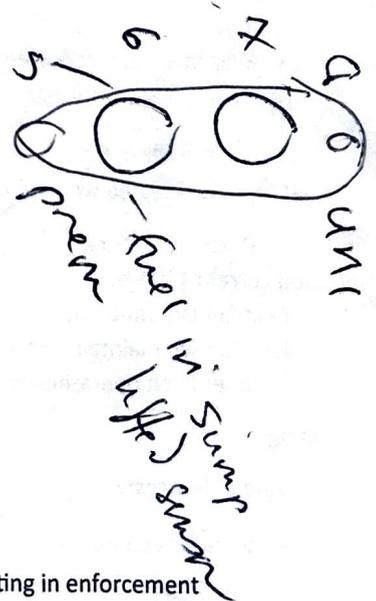
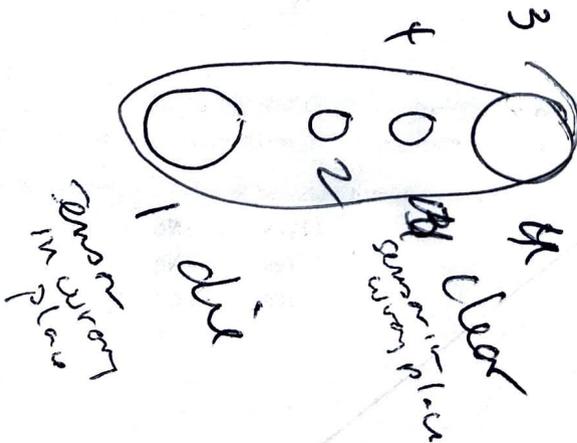
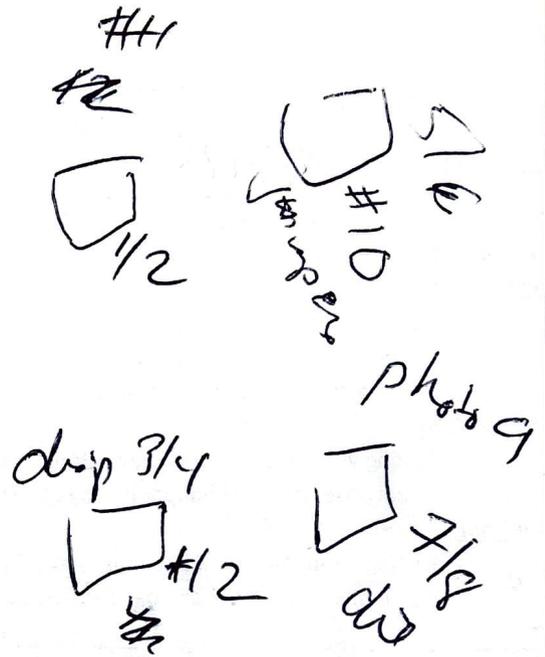
Tank Lining

Date of lest test? _____

Pressure test conducted after tank lining inspection? Yes No

XI. General notes from inspection

Representative onsite: _____ email: _____



Compliance Determination: No Violations Observed Observed violations resulting in enforcement

Inspector Signature: _____ Date: _____



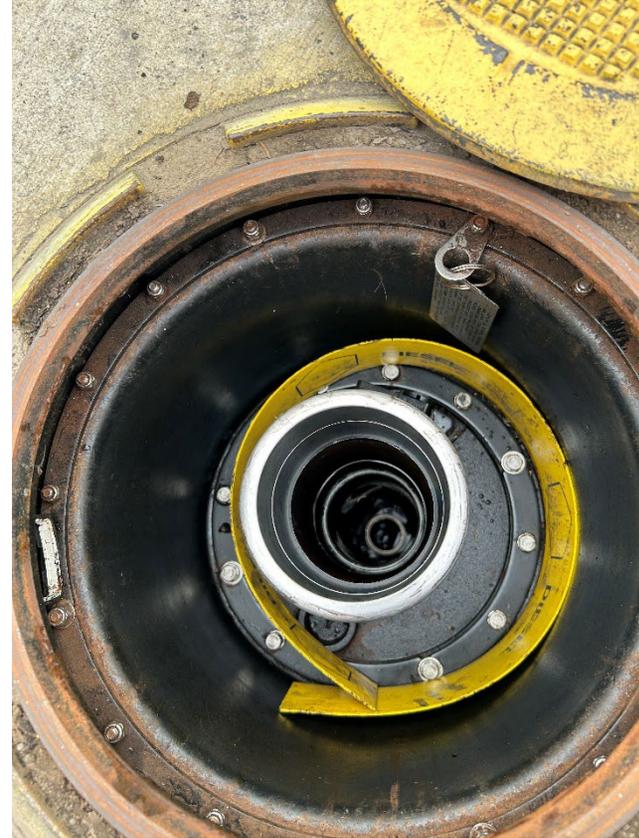
Tank nest1:



Site:



Diesel STP:



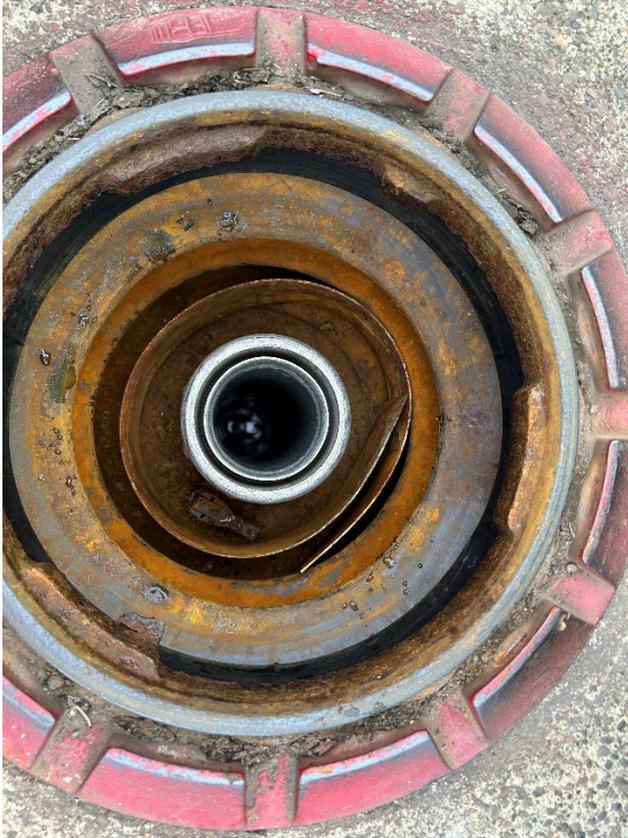
Diesel spill:



Clear STP:



Clear Spill:



Prem spill2:



Prem STP3:



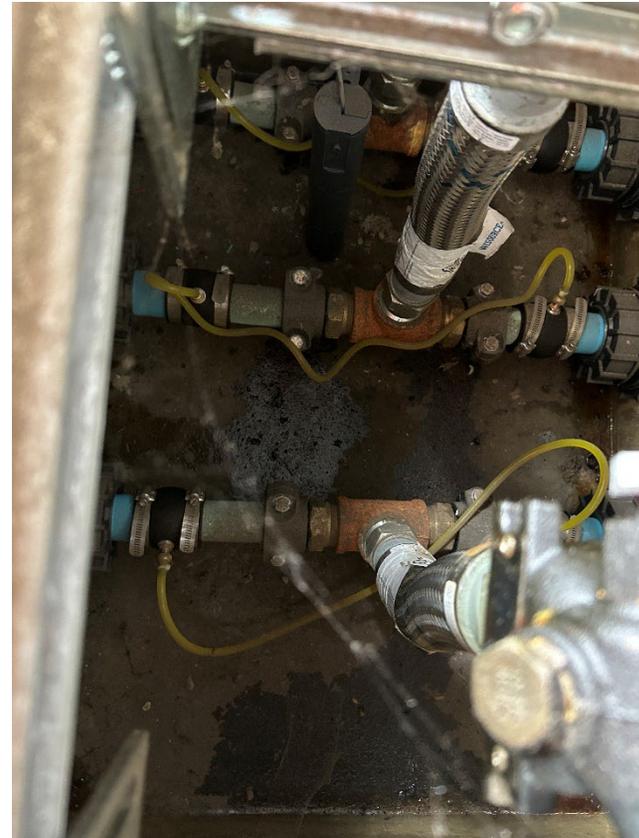
Reg STP:



4:



Disp 7/8:



5:



Disp 1/2:



6:



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September 04, 2025

Rajiv Kumar
H & N Petroleum LLC
1550 S Main St
Lebanon, Oregon 97355

RE: Pre-enforcement Notice
LEBANON FAST GAS
DEQ UST Facility ID No. 9194
2025-PEN-9974

Rajiv Kumar,

The Oregon Department of Environmental Quality (DEQ) believes LEBANON FAST GAS has violated Oregon's environmental regulations at the underground storage tank (UST) facility 9194 located at 1550 S MAIN ST, LEBANON, Oregon 97355.

On 09/03/2025, the Department of Environmental Quality (DEQ) conducted an inspection at the above facility. Based upon this investigation, the Department has concluded that H & N Petroleum LLC is responsible for the following violations of Oregon environmental law:

Violations:

Violation Description	OAR	Corrective Action
Failure to investigate or confirm a suspected release.	340-150-0163(1)(f)	1
Failure to operate or maintain a method or combination of methods for release detection such that the method can detect a release from any portion of the UST system.	340-150-0400(1)(c)	2
Failure to test spill prevention equipment and/or equipment used for interstitial monitoring of piping at least once every 3 years.	340-150-0310(8)(b)	3
Failure to inspect overfill equipment at least once every 3 years.	340-150-0310(9)	4
Failure to complete initial overfill, spill prevention or sump testing requirements by October 1, 2020.	340-150-0310(10)	5
Failure to test automatic line leak detectors within 12 months of previous test.	340-150-0410(2)	6
Failure to perform line tightness testing within 12 months of previous test.	340-150-0410(3)	7
Failure to test the electronic and mechanical components of the release detection system within 12 months of the previous test	340-150-0400(2)	8

In order to correct the violations cited above, you must take the following actions by the date indicated:

Corrective Actions:

#	Corrective Action Description	Due Date
1	Investigate presence of fuel in premium sump. Submit results to DEQ.	10/06/2025
2	No further corrective action. Sensors moved to correct position while on site	

#	Corrective Action Description	Due Date
3	Submit to DEQ passing hydrostatic tests for all spill buckets plus diesel and clear premium STP sumps.	10/06/2025
4	No further corrective action	
5	No further corrective action	
6	No further corrective action	
7	No further corrective action	
8	No further corrective action	

This matter is being referred to the Department's Office of Compliance and Enforcement for formal enforcement action, which may include assessment of civil penalties and/or issuance of a Department order. Your timely and responsive action on these items will be taken into consideration in any civil penalty assessment issued by the Department.

If you believe any of the facts in this Pre-Enforcement Notice are in error, you may provide written information to me at the address shown at the top of this letter. The Department will consider new information you submit in determining the appropriate enforcement actions that will be taken for this violation. Please feel free to contact the UST Duty Officer at ust.dutyofficer@deq.oregon.gov or at (503) 229 - 5034 if you have any questions about compliance with DEQ's UST regulations.

Sincerely,

Diana Foss

Diana Foss
Senior Policy Analyst,
Underground Storage Tanks