



ASSOCIATED  
ENVIRONMENTAL  
GROUP, LLC

Mary Shaleen-Jansen

November 28, 2007

Mr. Joe Hickey  
Voluntary Cleanup Program Coordinator  
Toxics Cleanup Program  
Washington State Department of Ecology - Northwest Regional Office  
3190 160<sup>th</sup> Ave SE  
Bellevue, Washington 98008

RE: Proposed Scope of Work – Supplemental Remedial Activities  
Former Devere and Sons Distributing  
1000 First Street E  
Cle Elum, Washington 98922

RECEIVED

NOV 30 2007

DEPT. OF ECOLOGY  
TCP-NWRO



Dear Mr. Hickey:

Associated Environmental Group, L.L.C. (AEG) has prepared this letter to summarize environmental investigations completed by AEG at the above referenced property located at 1000 First Street E, in Cle Elum, Washington (herein referred to as the Site). This letter will provide a brief description of the environmental investigation activities conducted, subsequent findings, recent interim cleanup action performed, and the proposed scope of work for Supplemental Remedial Activities for the Site. Presented below is a discussion of the work completed to date at the Site.

#### **SITE BACKGROUND**

The following timeline of the previous environmental activities at the Site is based on a review of documents at the Washington State Department of Ecology (Ecology) and our environmental investigations at the Site:

On March 9, 1994, a Pacific Northern Environmental (PNE) technician performed a tracer tank/line test at the Site and noted that a probe, installed by PNE in conjunction with tracer testing conducted a year earlier, had been removed. PNE replaced the missing tracer probe. On March 10, 1994, the facility operator's staff performed a tank volume measurement on a 15,000 gallon aboveground storage tank (AST) and realized that there was a 8,400-gallon loss of product. Upon investigation, the operator found that the newly installed replacement tracer probe had punctured the 2 inch fiberglass product line from the diesel AST to the pump island. The punctured line was immediately repaired by the operator's staff. PNE personnel completed the site cleanup.

On March 12, 1994, five test pits were excavated at the Site to evaluate the concern regarding offsite migration of petroleum products onto the Site and to remove the diesel product fuel from the groundwater. Of the five test pits excavated, only the fifth test pit, located approximately 15 feet east of the spill area, showed petroleum impacted soil and groundwater. A 12-inch perforated PVC extraction pipe was installed in the test pit, and a water-diesel (liquid phase hydrocarbon) mixture was pumped out of the pipe. The extraction pump was thereafter disconnected by PNE because very little product had been recovered.

In January 1995, Pacific Northern Geoscience (PNG) filed a status report regarding the product recovery program in place at the Site. This report referenced a prior status report dated November 30, 1994; however, AEG has not been able to locate a copy of this report. PNG reported that very little product had been recovered from two monitoring wells installed. They theorized that fluctuating water levels may have caused the product remaining on Site to become trapped in an interstitial pore space within the saturated zone. PNG concluded that additional recovery of the free product was not feasible. *in Ecology records*

They recommended installation of three additional monitoring wells and continuing soil and groundwater sampling as part of a RI/FS. There is no further information regarding this release, other than a May 15, 1996 note from Mr. Gerald Tousley of the Kittitas County Health Department that the 1994 incident was closed because the Site Hazard Assessment process was completed.

In that same memo, Mr. Tousley made reference to a 200 gallon leak of unleaded gas from a 1000 gallon UST that had apparently occurred over a span of several months. Mr. Tousley reported that the owner had told him that the offending tank had been drained and that he intended to remove all USTs and install aboveground tanks. Furthermore, Mr. Tousley reported that documentation existed to show that the subsurface soil and groundwater remained contaminated. Mr. Tousley assigned the site a hazard ranking of 5 with a score of one representing the highest relative level of concern and five the lowest.

As per a UST Closure Site Assessment Report filed by SAGE Earth Sciences in September 1996, Northwest Petroleum Equipment (NPE) and Randy's Blue Dot Excavating removed two USTs on July 17, 1996. Soil analytical results indicated petroleum impact to the subsurface. In June 1994, a Notice of Intent to remove a 4,000 gallon UST was filed with the Ecology. Ecology files do not show a corresponding UST decommissioning report. On March 29, 1999, James DeVere, owner of the Site, filed a SPCC Plan Certification that declared that the facility had been cleaned up per the US Environmental Protection Agency. *in Ecology records*

On August 9, 2000, Ecology received information regarding a small surface spill of approximately 40 gallons of oil/petroleum from an AST. The spill was cleaned up and on September 28, 2000, Mr. Dick Bassett from Ecology recommended that a No Further Action letter be issued. On May 21, 2003, there was a report of a small release (between 10 and 50 gallons) of heating oil from a UST. Blue Mountain Environmental Consulting Services retained and cleaned up the spill.

On August 9, 2006, AEG was retained by Mr. Devere to sample the three groundwater monitoring wells onsite to check for the presence of residual petroleum contamination from the historical releases and the subsequent cleanup action. Analytical results indicated presence of diesel range hydrocarbons and benzene at levels slightly above Ecology MTCA Method A groundwater cleanup levels at MW-1 and MW-4. Based on these results, AEG recommended a Phase II ESA Site Characterization to delineate the extent of petroleum contamination at the Site.

On August 31, 2006 AEG conducted a Preliminary Site Characterization at the Site. Five borings were advanced, and three borings were completed as monitoring wells. Analytical results indicated elevated concentrations of gasoline, benzene, and diesel range TPHs in groundwater, at levels above Ecology MTCA Method A groundwater cleanup levels. AEG also conducted bioremediation at the Site via injection of 400 pounds of Oxygen Releasing Compound (ORC) on April 3, 2007. ORC was injected to accelerate the naturally occurring aerobic contaminant biodegradation in groundwater and saturated soils. ORC was injected from 6 1/2 feet to 10 feet bgs at eight borings. These borings were placed upgradient of the ASTs and dispenser islands at the subject property. Approximately 50 pounds of ORC was injected per boring in locations upgradient of areas identified as containing petroleum hydrocarbons.

Since that time there have been two separate groundwater sampling events at the Site. Analytical results indicated that elevated gasoline range TPHs and benzene constituents exist predominantly at MW-4, located adjacent to the east of the ASTs. Four quarterly groundwater sampling events have been completed at the Site between October 2006 and August 2007. Analytical results from these sampling events indicated no detectable concentrations of all constituents of concern at MW-1 through MW-3, and MW-6. Low detections of gasoline TPHs and benzene have been detected at MW-5B, located in the eastern area of the Site, during the last two events; however, at concentrations below cleanup levels.

As per Ecology MTCA regulations, these monitoring wells (MW-1 through MW-3, and MW-5B and MW-6) will no longer be required to be monitored and sampled based on the no detectable or low detections of TPHs and BTEX (below cleanup levels) at these monitoring wells for the past five quarters.

#### **PROPOSED SUPPLEMENTAL REMEDIAL ACTIVITIES & SITE WORK**

Based on the previous site work described above, the scope of the Supplemental Remedial activities would complement the existing body of knowledge on the nature and extent of contamination summarized in sections presented above. AEG proposes to inject an additional 1000 pounds of ORC in the area around MW-4 in two separate events. The principal remedial tasks for addition site work include the following:

- Advance 10 shallow borings in the areas surrounding MW-4 to inject 1000 pounds of ORC into the groundwater at the Site. ORC will be injected from 6 1/2 feet to 10 feet bgs.;
- Following the second injection of ORC at the Site, conduct groundwater monitoring and sampling activities at the Site for existing monitoring well MW-4 for two quarters;
- Following two quarters of sampling, advance 10 shallow borings in the area surrounding MW-4 to inject an additional 1000 pounds of ORC into the groundwater at the Site. ORC will be injected from 6 1/2 feet to 10 feet bgs.;

- Following the third installation of the ORC at the Site, conduct groundwater monitoring and sampling activities at the Site for existing monitoring well MW-4 for two more quarters.

Supplemental Characterization of the Site would include the following tasks:

- Submit groundwater samples from MW-4 for analysis of gasoline range and diesel through mineral oil range TPHs and BTEX constituents;
- Prepare and submit Quarterly Groundwater Monitoring/Sampling Reports as part of Performance Monitoring at the Site.

### **PERFORMANCE MONITORING OF GROUNDWATER**

The performance monitoring of groundwater at the Site would include the following tasks:

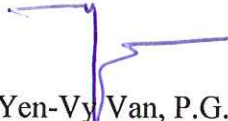
- Prepare and submit Quarterly Groundwater Monitoring/Sampling Reports documenting the depth-to-water, groundwater migration direction, and summarizing analytical results of the performance groundwater monitoring at MW-4. All reports will be generated by AEG will be reviewed by a WA State licensed hydrogeologist.
- After the second round of two quarters of groundwater sampling AEG will prepare and submit a final Site Closure Report and a request Ecology to issue a No Further Action (NFA) determination for the Site;
- All data generated will be submitted in accordance with WAC 173-340-840(5) in both written and electronic format.

The proposed Supplemental Remedial Investigation and further groundwater investigations will be conducted as an independent cleanup action under the Ecology Voluntary Cleanup Program to meet the MTCA requirements for obtaining an NFA determination from Ecology. The MTCA requirements for substantial equivalence under Section 515 of Chapter 173-340 of the Washington Administrative Code (WAC 173-340-515) will be met, including providing Ecology with information on subsequent Site cleanup action, as applicable.

## CLOSING

Before proceeding with the proposed scope of work presented above, AEG's client requests Ecology prepare an opinion letter for the Site indicating approval of the proposed supplemental remedial investigation plan. Please contact the undersigned at (360) 352-9835 with questions, comments, and/or your approval.

Associated Environmental Group, L.L.C.

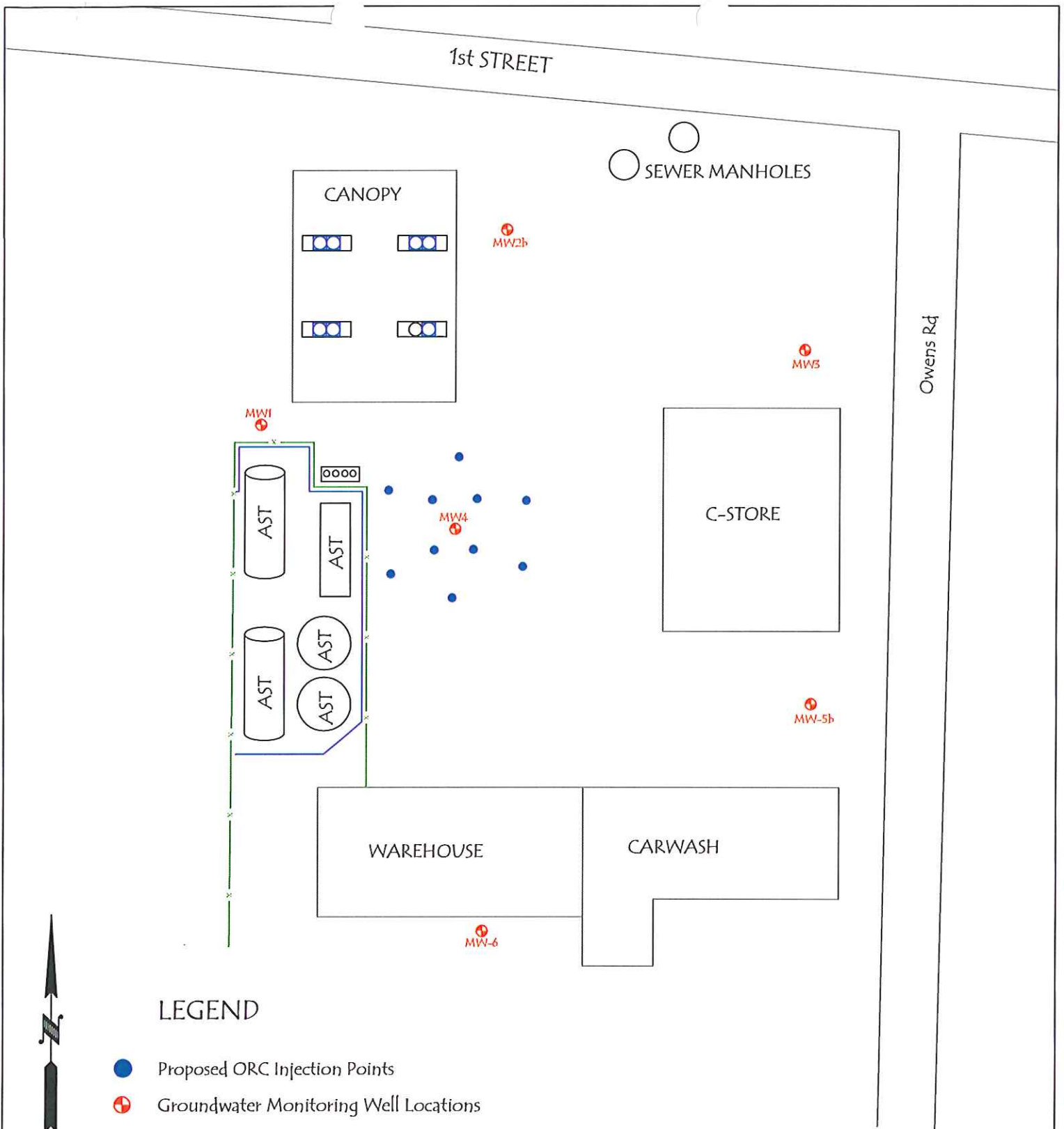


Yen-Vy Van, P.G., P. H.G.  
Senior Hydrogeologist



Michael S. Chun, RSA  
General Manager/Principal

Enclosures: Figure 1, *Proposed Site Work*  
Table 1, *Summary of Quarterly Groundwater Analytical Results*



Notes: (a) The locations of all features shown are approximate.

(b) This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document.

Reference: Drawing created from sketch provided by AEGs' personnel.

**ASSOCIATED ENVIRONMENTAL GROUP, LLC**  
 Environmental Consulting and Contracting  
 1728 State Avenue NE, Suite 101  
 Olympia, WA 98506  
 (360) 352-9835 Fax (360) 352-8164

FIGURE 1  
 PROPOSED SITE WORK

DEVERE & SONS  
 1000 E. 1ST STREET  
 CLE ELUM, WA

Project:	Date:
06-192	11/9/2007

**Table 1 Summary of Quarterly Groundwater Analytical Results**  
Devere & Sons  
Cle Elum, WA

Sample Number <sup>1</sup>	Date Collected	BTEX <sup>2</sup> (µg/L)				Gasoline <sup>3</sup> (µg/L)	Table 830-1 Constituents (µg/L)					Diesel <sup>4</sup> (µg/L)	Oil <sup>1</sup> (µg/L)	Mineral Oil <sup>1</sup> (µg/L)
		Benzene	Toluene	Ethylbenzene	Xylenes		Total Lead	1,2-Dichloroethane (EDC)	1,2-Dibromoethane (EDB)	Total Naphthalenes	MTBE			
MW-1	10/20/06	<1.0	<1.0	<1.0	<1.0	<100	<1	<1.0	<0.01	<5.0	<5.0	1660	<400	<400
	2/13/07	**	**	**	**	**	**	**	**	**	**	**	**	**
	5/15/07	<1.0	<1.0	<1.0	<1.0	<100	-	-	-	-	-	<200	<400	<400
	8/14/07	<1.0	<1.0	<1.0	<1.0	<100	-	-	-	-	-	<200	<400	<400
MW-2b	10/20/06	<1.0	1.3	<1.0	1.5	<100	<1	<1.0	<0.01	<5.0	<5.0	1350	<400	<400
	2/13/07	<1.0	<1.0	<1.0	<1.0	<100	-	-	-	-	-	<200	<400	<400
	5/15/07	<1.0	<1.0	<1.0	<1.0	<100	-	-	-	-	-	<200	<400	<400
	8/14/07	<1.0	<1.0	<1.0	<1.0	<100	-	-	-	-	-	<200	<400	<400
MW-3	10/20/06	<1.0	2.1	<1.0	2.6	<100	<1	<1.0	<0.01	<5.0	<5.0	<200	<400	<400
	2/13/07	<1.0	<1.0	<1.0	<1.0	<100	-	-	-	-	-	<200	<400	<400
	5/15/07	<1.0	<1.0	<1.0	<1.0	<100	-	-	-	-	-	<200	<400	<400
	8/14/07	<1.0	<1.0	<1.0	<1.0	<100	-	-	-	-	-	<200	<400	<400
MW-4	10/20/06	11	3.0	2.8	4.8	<100	11	<1.0	<0.01	<5.0	<5.0	2240	<400	<400
	2/13/07	<1.0	<1.0	<1.0	<1.0	<100	-	-	-	-	-	<200	<400	<400
	5/15/07	50.3	6.7	9.2	9.6	897	-	-	-	-	-	<200	<400	<400
	8/14/07	86.2	22.0	11.4	10.3	822	-	-	-	-	-	<200	<400	<400
	11/25/07	39.3	13.9	1.1	16.6	1640	-	-	-	-	-	<200	<400	<400
MW-5b	10/20/06	<1.0	<1.0	<1.0	<1.0	<100	<1	<1.0	<0.01	<5.0	<5.0	1730	<400	<400
	2/13/07	<1.0	<1.0	<1.0	<1.0	<100	-	-	-	-	-	<200	<400	<400
	5/15/07	2.9	<1.0	<1.0	<1.0	154	-	-	-	-	-	<200	<400	<400
	8/14/07	1.3	<1.0	<1.0	<1.0	154	-	-	-	-	-	<200	<400	<400
	11/25/07	<1.0	<1.0	<1.0	<1.0	110	-	-	-	-	-	<200	<400	<400
MW-6	10/20/06	<1.0	<1.0	<1.0	<1.0	<100	6	<1.0	<0.01	<5.0	<5.0	1310	<400	<400
	2/13/07	<1.0	<1.0	<1.0	<1.0	<100	-	-	-	-	-	<200	<400	<400
	5/15/07	<1.0	<1.0	<1.0	<1.0	<100	-	-	-	-	-	<200	<400	<400
	8/14/07	<1.0	<1.0	<1.0	<1.0	<100	-	-	-	-	-	<200	<400	<400
PQL Ecology MTCA Method A Cleanup Levels	1.0	1.0	1.0	1.0	100	1	1.0	0.01	5.0	5.0	200	400	400	
	5	1,000	700	1,000	800	15	5	0.01	160	20	500	500	500	

**Notes:**

<sup>1</sup> Approximate monitoring well locations are shown in Figure 1

<sup>2</sup> Analyzed by EPA 8021B. B = benzene, T = toluene, E = ethylbenzene, X = xylenes

<sup>3</sup> Analyzed by Northwest method NWTTPH-Gx

<sup>4</sup> Analyzed by Northwest method NWTTPH-Dx/Dx extended

µg/L = micrograms per Liter

"-" indicates not tested for analyte

"<" not detected above laboratory detection limits.

PQL=Practical Quantitation Limit

Bold indicates the detected concentration exceeds Ecology MTCA Method A cleanup level

\*\* Not Sampled




# SPCC Plan Certification Information

Name of Facility: DeVere & Sons Distributing, Inc.  
 Type of Operation: Bulk Storage Facility, Card Lock and Retail Distribution  
 Date of Initial Operation: Approximately 1915  
 Location of Facility: 1000 E. First Street, Cle Elum, Washington 98922  
 Name/Address of Owner: James DeVere  
 502 Cleveland  
 South Cle Elum, WA 98922

Person Responsible for Oil Spill Prevention: James DeVere, Owner

Oil Spill History: This facility has experienced a spill event of approximately 7,500 during its operation in 1996 when an underground pipeline was damaged by a probe. The spill was cleaned up and the facility has been declared a clean site by the U.S. Environmental Protection Agency.

Management extends full approval at a level with authority to commit the necessary resources toward spill prevention.

  
 \_\_\_\_\_  
 James DeVere, Owner Date 3/29/99

### Certification:

I hereby certify that this facility has been examined by me or under my direct supervision and, being familiar with the provisions of 40 CFR, Part 112, I attest that this SPCC Plan has been prepared in accordance with good engineering practices.

  
 \_\_\_\_\_  
 D. Richard Wyatt Date 3/25/99

Registration No: 12494  
 State of Washington

# Spill Prevention, Control, and Countermeasures Plan (SPCC)

## Part I - General Information

DeVere & Sons Distributing, Inc.  
1000 E. First Street  
Cle Elum, Washington 98922  
Phone: (509) 674-2442  
Fax: (509) 674-4712  
Owner:  
James DeVere  
Phone: (509) 674-2442

In 1973, the U.S. Environmental Protection Agency issued the Oil Pollution Prevention regulation, which is codified at 40 CFR Part 112, to address the oil spill prevention provisions contained in the Clean Water Act of 1972. The regulation forms the basis of EPA's oil spill, control and countermeasures (SPCC) program. In particular, the regulation applies to non-transportation related facilities that:

- \* Have an aboveground storage capacity of more than 660 gallons in a single tank; an aggregate aboveground storage capacity of more than 1,320 gallons; or a total underground storage capacity of 42,000 gallons; and
- \* Due to its location, could reasonably be expected to discharge oil in harmful quantities into the navigable waters of the United States or adjoining shorelines.

Each owner or operator of a regulated facility is required to prepare an SPCC Plan. The SPCC Plan is required to address the facility's design, operation, and maintenance procedures established to prevent spills from occurring, as well as countermeasures to control, contain, clean up and mitigate the effects of an oil spill that could affect navigable waters.

### Description of Facility

DeVere & Sons Distributing, Inc. is a bulk storage, fuel pump and card lock facility that handles, stores and distributes diesel fuel, gasoline, kerosene and motor oil. This facility is located at 1000 E. First Street, Cle Elum, Washington, approximately (1/2) mile south <sup>west</sup> of the Yakima River. The facility initially began operations in approximately 1915.

Petroleum product storage at the facility has been evaluated to determine spill potential and impact in the event of tank rupture (i.e. quantity, direction of flow, secondary containment, proximity to navigable waters). This SPCC Plan includes the determination of necessary containment and/or diversionary structures to prevent the discharge of petroleum product. The site has a relatively level, flat surface.

## PART I - General Information (continued)

The warehouse is utilized for the storage of motor oil and grease. Approximately four thousand (4,000) gallons of product are stored in the warehouse. Fire extinguishers are located in the warehouse and throughout the facility and readily available for use. A variety of safety-related signage is posted throughout the warehouse and the facility, including "no smoking" signs. Sorbent rolls, pads and other sorbent materials are stored in the warehouse and on the warehouse dock.

A car wash facility and a Mini Mart building are located on the site.

The tank loading area is equipped with a concrete catch basin and buckets for secondary containment. There is no drainage from this catch basin. Vehicle access to the tank/truck loading area is limited by chain link fencing and gates.

All piping at the facility is underground, except for aboveground piping running from the tank load area to the tanks and tank dike. The underground piping is fiberglass.

A "no smoking" sign and a sign reminding drivers to attach the bonding cable and listing rules and procedures for loading and unloading tank trucks at bulk plants are located at the truck loading rack. There is no secondary containment or drain located in the truck loading rack area.

The card lock area is adjacent to the office and truck loading rack. Card lock pumps are protected from vehicular traffic by metal barrier poles and pumps are positioned on concrete islands. A lighted canopy covers the card lock area. The emergency shut off switch for the card lock dispensers is located on the adjacent chain link fence which surrounds the bulk tank dike. A sign indicates the location of the emergency shut off switch for the card lock dispensers.

A lighted canopy covers the eight (8) fueling dispensers at the facility. These fuel dispensers sit on concrete islands and are protected from vehicular traffic by metal barrier poles. Signs in this area warn read "Stop Engine" and "No Smoking." The emergency shut off switch for the fuel pump area is identified by a sign and is located adjacent to the pumps, on the chain link fence directly south of the pumps.

The four (4) bulk storage tanks at the facility are surrounded by a two foot (2') high concrete dike and chain link fencing and gates. Both horizontal tanks are internally partitioned tanks. One (1) horizontal tank is identified as Tank #2 and #6 and is a fire safe tank. This tank is divided into two (2) sections; 14,000 gallons and 6,000 gallons each. The horizontal tank identified as Tank #3A and #3B and is divided into two equal sections of 5,000 gallons each. The vertical tanks at the site are identified as Tanks #1 and #4. (A "Tank #5" does not exist at this facility.) A drainage valve for the bulk tank dike is located in the dike in the area of the card lock fueling dispensers.

## PART I - General Information (continued)

A description of the bulk tanks and their contents is included in this plan. All bulk storage tanks rest on concrete slabs. The floor of the diked area is dirt with a gravel surface. The diked containment area includes a manually operated drain valve and in the event of a spill, this valve would be used to transfer product to a truck for disposal.

One (1) delivery vehicle is utilized at the facility. This truck has five (5) separate compartments and a total capacity of approximately two thousand (2,000) gallons. Product delivered includes gasoline, diesel and kerosene. Product is not routinely stored in this vehicle. However, it may contain some fuel overnight while not in use. Sorbent materials and fire extinguishers are available for use on the truck at all times.

Asphalt paving covers the facility surface area, except in those areas where concrete slabs are in place and in the bulk tank diked area. Security for the site is provided by chain link fencing, gates, and the local police department. The facility has sufficient lighting throughout. Facility controls are accessed only by authorized personnel.

### Past Spill Experience

There have not been spills at this facility during the past calendar year or any two (2) discharges of harmful quantities of oil into navigable waters. However there has been a spill in excess of 1,000 gallons in a single event in the history of this facility. In 1996, approximately seven thousand five-hundred (7,500) gallons of diesel fuel leaked into the ground due to a pipe line damaged during probing. With the direction of the State of Washington Department of Ecology (DOE) and the U.S. Environmental Protection Agency (U.S. EPA), the contaminated soil was removed and the spill was cleaned up. The U.S. EPA has declared the facility to be a clean site.

NOTE: 40 CFR Part 112.4 requires any facility which has experienced a spill in excess of 1,000 gallons in a single event into navigable water, or any two (2) discharges of harmful quantities of oil into navigable waters within a twelve (12) month period to submit their SPCC Plan for review to the EPA within sixty (60) days of the incident(s).

### Proprietary Information

This SPCC Plan has been prepared for the exclusive use of DeVere & Sons Distributing, Inc. Any use, distribution, or reproduction thereof without the written consent of Wyatt Engineering, Inc. or DeVere & Sons Distributing, Inc. is prohibited.

## PART II - Potential Spills

### A. Prediction:

	<u>Source:</u>	<u>Major Type of Failure</u>	<u>Direction of Flow</u>	<u>Secondary Containment</u>
1.	Bulk Tank Storage	Rupture or Overflow	North	Concrete Dike
2.	55 Gallon Drums in Warehouse Building	Rupture or Spill	North/ Northwest	None in Place
3.	Fuel Dispensers	Overflow or Rupture	North	None in Place
4.	Tank Load Area	Overflow or Fitting Failure	North	Concrete Dike & Buckets
5.	Truck Load Area	Overflow or Fitting Failure	North/ Northwest	None in Place
6.	Card Lock Dispenser	Overflow or	North/ Northwest	None in Place
7.	Delivery Vehicle	Overflow or Fitting Failure	North/ Northwest	None in Place

### B. Discussion (Corresponding to Above):

1. The bulk tank storage area is surrounded by a two foot (2') high concrete dike. This storage area contains two (2) vertical tanks and two (2) horizontal tanks. Each of the horizontal tanks is internally partitioned and the compartments are considered as two (2) separate tanks. The calculations show that the secondary containment would hold the contents of the largest tank (19,500 gallons) with an excess storage area of approximately 245.75 cubic feet, or thirteen inches (13") of excess dike freeboard. A drain valve is located in the wall of the concrete dike and would be attached to a truck hose to pump product from the bulk storage tank area should a spill or rupture occur. Stormwater evaporation and absorption is adequate to prevent the accumulation of rainwater in the secondary containment area. Surface in the dike area is dirt covered with gravel.

## PART II - Potential Spills (continued)

2. The warehouse building is used to store approximately seventy-five (75) 55-gallon drums of motor oil and grease. The floor of the building is wood. A leak or spill from a 55-gallon drum could be contained within the building. Sorbent materials are visible and readily available for use in this building and on the warehouse dock.
3. The fuel dispensers at the site sit on concrete islands and are protected by metal barrier poles. Should a spill occur in this area, it would flow north toward the city storm drain located between First Street and the facility. A spill would be contained with sorbent materials and/or a contractor would be contacted for the use of heavy equipment to contain the spill. An emergency shut off switch is located on the chain link fence adjacent to the fuel pumps.
4. The tank load area contains a concrete catch basin and buckets to collect spilled product. Sorbent materials would be used in this area if necessary.
5. The truck load area does not employ a secondary containment or drainage system. A potential spill or overfill in this area would be contained with sorbent materials and/or by constructing earthen berms.
6. No secondary containment is in use in the card lock dispenser area. A potential spill in this area would be contained with sorbent materials and/or by constructing earthen berms. An emergency shut off switch is located on the chain link fence adjacent to the card lock dispensers.
7. The delivery vehicle is parked at the facility when the vehicle is not in use. No secondary containment is in place should product spill or leak from the delivery vehicle when it is parked on the site.