



# ARKANSAS

ENERGY & ENVIRONMENT

## AGENDA

Division of Environmental Quality, Office of Land Resources

### DETAILS

Date | Time | Location: 5/29/2024 | 9:00 am | 5301 Northshore Dr. NLR, Commission Room 1W06 (Zoom via special request only\*)

Subject: Advisory Committee on Petroleum Storage Tanks

Call-In Phone Numbers: \*

Meeting ID: \*

Computer Link: \*

### ATTENDEES

Advisory Committee

Environmental Consultants

AOMA

### AGENDA ITEMS

- I. Call Meeting to Order
- II. Introduction of Guests
- III. Approval of Minutes
- IV. Financial Status Report - Trotta
- V. New Business - Request for Reimbursement - Kilburn

<u>LUST/LAST #</u>	<u>Con.</u>	<u>App. #</u>	<u>Facility Name, City</u>	<u>Reimbursement</u>
1 23-0106	PMI/TERR	8	Mayflower Quick Mart, Mayflower	\$12,778.82
2 62-0012	PMI/TERR	8	Forrest City Shell, Forrest City	\$71,641.80
3 73-0076	PMI/TERR	4	Doublebee's #104, Kensett	\$13,073.15
4 48-0022	EPC	1	Exxon Circle N South [JRM4 LLC], Brinkley	\$12,055.15
5 56-0016	EPC	5	Jordan's Kwik Stop #39, Lepanto	\$7,863.14
6 09-0010	PPM	14	Valero Corner Store #1800, Dermott	\$21,040.35
7 60-0935	SNYDER	1	Dixon Road Exxon, Little Rock	\$55,321.10
8 72-0219	AKIN	1	Paschal Grocery, Elkins	\$59,397.27
<b>Total</b>				<b>\$253,170.78</b>

VI. Other Business -



**Minutes  
Advisory Committee on Petroleum Storage Tanks  
May 1, 2024**

The Advisory Committee on Petroleum Storage Tanks held a meeting at 9:00 a.m., on May 5, 2024, in the Arkansas Department of Energy & Environment (E & E) building, Commission Room #1W06 and via teleconference. Chairperson Chris Howell called the meeting to order. Members in attendance were: Howell, Crossfield, Goings, and Free. May attended via teleconference. McMillan was not present.

DEQ/OLR staff members present were: Matthew McGhee, Bridget Green, Jarrod Zweifel, Joshua Stevens, and Blake Whittle, Micah Nash, Susan Speake, and Barbara Mathews attended via teleconference. E&E legal staff present was Lisa Thompson. Other guests present were: Stan Rasburry, PMI (Terracon); Oriana Thompson, SPATCO; Diana Curry, SPATCO; Darren Gibbs, Attorney, Mahesh Shah, Stop & Go; Ragini Shah, Stop & Go; and Steve Ferren, AOMA. Other guest who attended (via teleconference) were: Greg Wells, PMI (Terracon); Tyler Berry, Neel-Schaffer; Heather Slayton, EWI; Teagan Love, EWI; and Mark Hattenhower, ARCO Petroleum (via telephone). No one from the Attorney General's office was present.

Minutes from the March 27, 2024, meeting were reviewed for comments. Crossfield made the motion to approve the minutes and Free seconded the motion. The motion carried.

A Financial Status Summary was given by Matthew McGhee, OLR. The Petroleum Storage Tank Trust Fund balance as of March 31, 2024, was \$43,937,282.14, and the adjusted Fund balance was \$17,798,200.35.

Seven sites with interim applications for reimbursement were presented by Jarrod Zweifel. The grand total of all requests as recommended was \$573,928.70.

Resolution 24-22: Reimbursement to E-Z Mart, Attn: Steve Launius, 2015 Galleria Oaks, Texarkana, TX 75503, for corrective action costs at E-Z Mart Store #4217 (Formerly E-Z Mart #59), 4420 East 9th Street, Texarkana, TX, ID #46000028, was recommended for payment in the amount of \$137,976.92. Stan Rasburry, PMI (Terracon), represented this facility. Crossfield made the motion to approve the resolution. May seconded the motion. The motion carried.

Resolution 24-23: Reimbursement to Family Stops USA, LLC, Attn: Jonathan Griffin, 8405 South Zero Street, Suite C, Fort Smith, AR 72903, for corrective action costs at Pic-N-Tote #6, 6600 Phoenix Avenue, Fort Smith, AR, ID #66001786, was recommended for payment in the amount of \$16,638.71. Stan Rasburry, PMI (Terracon), represented this facility. Goings made the motion to approve the resolution. Free seconded the motion. The motion carried.

Resolution 24-24: Reimbursement to E. Ritter Oil Company, Attn: Maura Ashton, 10 Elm Street, Marked Tree, AR 72365, for corrective action costs at Mid-South Sales Inc., 116 Highway 63 West, Marked Tree, AR, ID #56000091, was recommended for payment in the amount of \$44,940.75. Stan Rasburry, PMI (Terracon), represented this facility. Crossfield made the motion to approve the resolution. Goings seconded the motion. The motion carried.



**DIVISION OF  
ENVIRONMENTAL QUALITY**

Sarah Huckabee Sanders  
GOVERNOR

Shane E. Khoury  
SECRETARY

Resolution 24-25: Reimbursement to Redzepe Nuhi, Attn: Tim Redzepe, 4635 West Keiser Avenue, Osceola, AR 72370, for corrective action costs at Former Interstate Mobil, 4701 West Keiser Avenue, Osceola, AR, ID #47000191, was recommended for payment in the amount of \$114,332.83. Oriana Thompson, SPATCO represented this facility. Crossfield made the motion to approve the resolution. Goings seconded the motion. The motion carried.

Resolution 24-26: Reimbursement to A to Z Holdings, LLC/Zoya Rentals, Attn: Nooruddin Bhamani, 13901 Chenal Parkway, Little Rock, AR 72211, for corrective action costs at Big Red Chenal, 13901 Chenal Parkway, Little Rock, AR, ID #60001089, was recommended for payment in the amount of \$56,342.70. Diana Curry, SPATCO represented this facility. May made the motion to approve the resolution. Free seconded the motion. The motion carried.

Resolution 24-27: Reimbursement to Gary Singh, P.O. Box 41316, Bakersfield, CA 93384, for corrective action costs at Blytheville Truck Stop, 3801 South Division Street, Blytheville, AR ID #47000217, was recommended for payment in the amount of \$194,696.79. Heather Slayton, EWI represented this facility. Goings made the motion to approve the resolution. May seconded the motion. The motion carried.

Resolution 24-28: Reimbursement to Lipscomb Oil Company, Attn: James H. Lipscomb, 1010 North Broadway Street, Greenville, MS 38702, for corrective action costs at The Filling Station #22, 762 Highway 65, Lake Village AR, #09000051, was recommended for payment in the amount of \$9,000.00. Tyler Berry, Neel-Schaffer represented this facility. Crossfield made the motion to approve the resolution. Free seconded the motion. The motion carried.

Other Business: A hearing for a Committee review of the Trust Fund ineligibility determination for Stop & Go, LUST #04-0196, ID #04000106 was held. Darren Gibbs, Attorney for the Responsible Party for Stop & Go, represented Mahesh and Ragini Shah. Lisa Thompson (E & E legal counsel) represented DEQ. Information and evidence were presented to the Committee from both parties. After discussion and deliberation, Crossfield made the motion that Stop & Go does not meet the statutory or regulatory requirements of eligibility of coverage by the Petroleum Storage Tank Trust Fund with regard to LUST #04-0196. May seconded the motion. The motion carried. A Proclamation will be given to the Director of DEQ/Chief Administrator of Environment for a final decision.

The next regular meeting will be held on May 29, 2024, at the E & E building, 5301 Northshore Drive, North Little Rock, Arkansas at 9:00 a.m. As there was no further business, the meeting adjourned at 10:32 a.m.

# ARKANSAS DEPARTMENT OF ENERGY AND ENVIRONMENT

## Assessment and Remediation, OLR - Petroleum Storage Tank State Trust Fund Financial Status Report for Period Ending April 30, 2024

I. Fund Balance on April 1, 2024 -----		\$	<u>43,937,282.14</u>
II. Receipts			
1. Previously reported -----		\$	<u>212,521,022.40</u>
2. April receipts -----		\$	<u>1,155,438.99</u>
Total receipts to date -----		\$	213,676,461.47
III. Expenditures			
1. Previously reported -----		\$	<u>168,583,740.34</u>
2. April expenditures -----		\$	<u>346,820.96</u>
Total expenditures to date -----		\$	168,930,561.30
IV. Fund Balance on April 30, 2024 -----		\$	<u>44,745,900.17</u>
V. Interest			
1. Previously reported -----		\$	<u>13,522,741.67</u>
2. April Interest-----		\$	<u>517,312.50</u>
Total interest to date -----		\$	<u>14,040,054.17</u>
VI. Total investments on April 30, 2024 -----		\$	<u>38,231,729.51</u>
VII. Funds available on April 30, 2024 -----		\$	<u>6,514,170.66</u>

**STATUS OF TRUST FUND**

\* provided by OLR - Petroleum Storage Tank Division

	4/30/2024	\$	<u>44,745,900.17</u>
Reserve for emergency projects -----		\$	350,000.00
Current claims received -----		\$	1,225,552.17
Claims approved but unpaid -----		\$	-
Other corrective action obligations (estimated) -----		\$	9,512,705.04
Orphan Sites -Corrective action obligations (estimated) -----		\$	13,831,000.00
Potential third party obligations (estimated) -----		\$	985,000.00
Adjusted balance -----		\$	<u>18,841,642.96</u>

CERTIFIED TRUE AND CORRECT

*William K. Tarter*

William Keith Tarter

Director of Compliance/Chief Financial Officer

SUPPLEMENTAL FINANCIAL INFORMATION		30-Apr-24			
Regulated Storage Tank Division - Petroleum Storage Tank State Trust Fund					03:17:31 PM
Amounts Held By Trustee					
For Periods Ending:		30-Apr-24			
Item		Inception	Current	Fiscal Year July 1	Average
No. Description		Of Program	Month	To Date	Per Month
====	=====	=====	=====	=====	=====
I	Fund Balance - Beginning	\$0.00	\$43,937,282.14	\$44,343,059.30	
II	Receipts:				
	(1) Petroleum Envrmt Fee	\$ 198,249,172.27	\$ 638,126.49	\$6,527,879.68	\$652,787.97
	(2) Investment Income - Interest	14,040,054.17	\$ 517,312.50	2,094,021.25	209,402.13
	(3) Other: Sale of Equipment	58,321.56	-	-	-
	(4) Other: Refunds of Remediation	126,518.28	-	-	0.00
	(5) Settlement Funds - Tank Owners	786,000.00	-	-	0.00
	(6) Restitution - Theft of Property	33,320.00	-	-	0.00
	(7) Other Refunds - Travel, Misc.	383,075.19	-	-	-
	Total Receipts	\$213,676,461.47	\$1,155,438.99	\$8,621,900.93	\$862,190.09
III	Expenditures:				
	(1) Remediation Reimbursements	137,884,838.25	233,181.94	5,294,574.74	\$529,457.47
	(1a) Third-Party Damage Payments	12,728,042.29	-	509,630.00	50,963.00
	(2) Other Expenses & On-Call Resp (ending 6/30/19)	6,741,542.31	N.A.	N.A.	N.A.
	(2a) On-Call Resp. (beginning 7/01/19)	3,911,162.88	87,712.62	2,092,765.45	209,276.55
	(2b) Other Expenses (beginning 7/01/19)	478,299.20	1,243.90	30,582.93	3,058.29
	(3) Refunds of Envrmt Fee (as apparent - DF&A)	304,693.70	-	-	0.00
	(4) Other: Audits	123,160.08	-	-	0.00
	(5) Other: Misc'l/Adjust's to Bal./WC (Land, etc.)	657,988.77	2.67	50,817.80	5,081.78
	(6) RST Budget Expenses/Equipment	6,100,833.82	24,679.83	240,689.14	24,068.91
	Total Expenditures	\$168,930,561.30	\$346,820.96	\$8,219,050.06	\$821,906.01
IV	Fund Assets - Bal.	30-Apr-24	\$44,745,900.17	\$44,745,900.17	\$44,745,900.17
V	Investments: beginning of period	\$0.00	38,231,729.51	38,217,187.50	
	Interest Income Earned	14,040,054.17	517,312.50	2,094,021.25	
	Securities Sold	N.A.	N.A.	N.A.	
	Transfers-in Deposits	N.A.	N.A.	N.A.	
	Securities Purchased	N.A.	N.A.	N.A.	
	Withdrawals for Expenses	N.A.	N.A.	N.A.	
	Total Investments	N.A.	38,231,729.51	40,311,208.75	
	Add: Funds Available Cash	N.A.	6,514,170.66	4,434,691.42	
	Total Trust Fund	30-Apr-24	N.A.	\$44,745,900.17	\$44,745,900.17
	Average Monthly C.D. Bal Current F.Y. T.D.			\$3,821,718.75	
	Approximate Average Cash Basis Investment Yield - Current F.Y.			45.661%*	
	Status of Trust Fund	30-Apr-24		AMOUNTS	
	Fund Balance on:	30-Apr-24	\$44,745,900.17		
	Reserve for Emergency Projects		-350,000.00		
	Current Claims Received		-1,225,552.17		
	Claims Approved But Unpaid		0.00		
	Other Estimated Remaining Obligations - Unpaid Work Plans Approved		-9,512,705.04***		
	Other Estimated Remaining Obligations - Orphan sites State Lead		-13,831,000.00		
	Subtotal		19,826,642.96		
	Less: Estimated - Potential Third Party Claims (Listed Below)**		-985,000.00**		
	Adjusted Fund Balance - Unreserved	30-Apr-24	\$18,841,642.96		
Note: Information is based on a Financial Statement prepared by DEQ's Fiscal Division.					
* Interest income on the investment CDs is as shown by DEQ's Fiscal Division on the cash basis.					
**Krishana, LLC vs. Total Petrochemicals & Refining USA, Inc. (settlement approved 12/18/23)					
**Becky Scott and David Squires Auto Sales vs. JMT One Stop					
**Burks' Family Investments, Kathy's Corner Shoppe, Pony Express Printing, and Mike and Kathy Burks vs. Mena Short Stop, LLC.					
*** Additional other work plans may be pending and not approved or resolved at this date.					
(RST - TRUST FUND STAFF REPORT)					

## State Trust Fund Expense Breakdown - April 2024

Reimbursement Claims - March 2024	\$233,181.94
Staff Salaries/Match	\$24,679.83
On-Call Contract, AECOM, Williams Junction, LAST 53-0014	\$31,582.31
On-Call Contract, PMI, Williams Junction, LAST 53-0014	\$13,195.50
On-Call Contract, SPATCO, JMT One Stop, LUST 60-0940	\$42,934.81
WC Admin Fees	\$2.67
Legal Staff Salary (West Publishing Corp)	\$0.00
Shared Resources	\$1,243.90
<b>Total Expenses</b>	<b><u><u>\$346,820.96</u></u></b>

## State Trust Fund Income Breakdown - April 2024

Petroleum Environmental Fee	\$638,126.49
Interest paid	\$517,312.50
<b>Total Income</b>	<b><u><u>\$1,155,438.99</u></u></b>

Regulated Storage Tanks  
Inventory of orphan LUST/LAST projects

Effective 04/30/2024

Site #	Fac ID	APN Facility Name	City	UST/AST	Cost code	Date Authorized	Pending activity	Estimated Cost
01-0087	1001508	01-00349 Arkansas River Petroleum	Gillett	AST	27010	2/19/2020	Active investigation; approved costs appear in "other CA obligations"; however, FPR will be required, at a minimum	\$650,000
07-0001	7001612	07-00316 Brown Motors	Hampton	UST	17018	2/22/2016	Active investigation; approved costs appear in "other CA obligations"	\$0
08-0025	8001511	08-00201 Joe's Texaco	Green Forrest	UST	17106	9/18/2019	Active investigation; approved costs appear in "other CA obligations"	\$0
11-0010	11000049	11-00273 Bobby's BP	Rector	UST	17060	8/11/2010	FPR needed (excavation).	\$1,030,000
17-0014	17000096	17-00276 Ozark Truck Plaza	Alma	UST	17054	12/15/2007	Investigation on-going; however, will require FPR at a minimum	\$2,095,000
34-0018	34000067	34-00350 Pirates Cove Express	Swifton	UST	17087	9/24/2014	Active investigation; approved costs appear in "other CA obligations"	\$0
35-0200	35001682	35-00934 Bulk Plant	Alzheimer	AST	27009	5/14/2014	Approved remediation costs appear in "other CA obligations"	\$0
35-0232	35001682	35-00934 Bulk Plant	Alzheimer	UST			Complete UST removal (contaminated soils)	\$50,000
41-0064	41000015	41-00265 Ford Grocery & Station	Wilton	UST	17072	8/15/2013	Active investigation; approved costs appear in "other CA obligations"	\$0
47-0061	47001626	47-00826 Rob's Mini Mart	Gosnell	UST	17117	10/8/2020	Active investigation; however, will require FPR at a minimum, probably a fixed system @ est. \$700,000	\$700,000
53-0014	53001505	53-00083 [former] Williams Junction Grocery	Perryville	AST	27012	4/20/2023	Active investigation; approved costs appear in "other CA obligations"; however, CAP will be required (fixed system). CAP needed (excavation)	\$1,612,000
54-0008	54000105	54-00324 West Acres Mini Mart-Citgo	W. Helena	UST	17046	8/12/2007		\$500,000
56-0005	56000116	56-00293 Caroline's Quick Shop	Trumann	UST	17108	3/7/2018	EA complete; CAP required; "treatment train" (i.e. excavation, vapor extraction, etc.)	\$900,000
57-0032	57000053	57-00350 Mena Short-Stop	Mena	UST	17120	5/16/2022	Active abatement, interim remediation costs appear in "other CA obligations". However, CAP will be required (fixed system)	\$850,000
60-0228	60000426	60-02817 Pony Express #9	North Little Rock	UST	17109	7/9/2018	Investigation on-going; however, will require FPR (excavation/disposal)	\$675,000
60-0760	60000426	60-02817 Flash Market #123	North Little Rock	UST	17111	2/14/2019	FPR needed (excavation/disposal)	\$1,710,000
60-0907	60001143	60-01784 Citgo #11	North Little Rock	UST	17116	3/12/2021	EA complete, CAP required. Method of remediation unknown at this time	\$100,000
60-0940	60001161	60-03465 JMT One Stop	North Little Rock	UST	17119	9/3/2021	Active investigation; approved costs appear in "other CA obligations"	\$0
62-0004	62000123	62-00193 Roadrunner #46	Forrest City	UST	17063	6/2/2011	FPR needed (excavation)	\$835,000
66-0131	66000352	66-01156 Total #4012 (DS #4)	Fort Smith	UST	17061	2/1/2011	FPR needed (multi-technology)	\$1,054,000
71-0021	71001635	71-00204 Highway 65 Country Store	Damascus	AST	27011	10/11/2018	Active investigation; approved costs appear in "other CA obligations"	\$0
71-0026	71000042	71-00193 Flash Market #409	Shirley	UST	17118	2/19/2021	Active investigation; approved costs appear in "other CA obligations"	\$0
72-0009	72000049	72-00337 Former Road Runner #60	Fayetteville	UST	17003	1/24/2011	FPR needed (horizontal extraction wells via DPE)	\$1,270,000

\* Does not include all costs for corrective action at sites which have not yet been investigated.

Grand Total \* \$13,831,000



# ARKANSAS

## ENERGY & ENVIRONMENT

**MEMORANDUM OF REVIEW**  
**Reimbursement Request**  
**Petroleum Storage Tank Trust Fund**

From: Petroleum Storage Tank Trust Fund Staff

Date: May 29, 2024

Subject: **Mayflower Quick Mart**  
**555 Hwy 365/Hwy 89**  
**Mayflower, AR**  
**ID #23000021      LUST #23-0106      AFIN 23-00673**

A request for reimbursement (#8) for costs incurred during remediation of an UST site was received from the Responsible Party (RP) on March 12, 2024. The RP of this site reported a gasoline release (#23-0106) on June 15, 2016, when Arkansas Petroleum Services was onsite in response to a slow dispenser, fuel and water were observed coming up out of the unleaded pump and from cracks in the pavement, due to high groundwater. The name and the address of the RP:

**Mayflower Quick Mart**  
**Attn: Anil Gupta**  
**P.O. Box 309**  
**Prescott, AR 71857**

The period covered by this application is July 22, 2022 through December 13, 2023. Remediation activities for which reimbursement is requested include: development and preparation of the Revised Corrective Action Plan and preparation of Reimbursement Application #8.

To date, a total of 110 gasoline-equivalent gallons of product and 18,280 gallons of water were removed from the site during two dewatering events and four 12-hour MDPE events.

This application includes three (4) invoices from Pollution Management, Inc./Terracon (PMI) totaling \$12,778.82. Included in PMI's invoice(s) are charges for PMI labor.

The consultant and the RST Case Manager have each prepared a summary of activities. (See attachments).



**RECOMMENDATION:**

The claimed cost of **\$12,778.82** was checked against documentation provided. Copies of the Cost Summary Sheet and all recap sheets provided by the RP are attached.

The staff recommends payment as follows:

<b>Claim filed- Form TF-1</b>	<b>\$ 12,778.82</b>
<b>Less: Deductible</b>	<b>- 00.00</b>
<b>Less: Adjustments</b>	<b>- <u>00.00</u></b>
<b>Total Net Claim</b>	<b><u>\$ 12,778.82</u></b>

It is recommended that the claim made by the RP be considered in the amount of **\$12,778.82**.

## Approved Work Plans

23000021 23-0106 MAYFLOWER QUICK MART

	<u>Date</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	01/17/2018	Revised Site Assessment Work Plan	PMI	\$70,429.69
02	03/14/2018	C.O. #1 to the Revised Site Assessment Work Plan	PMI	(\$5,212.00)
03	04/17/2018	C.O. #2 to the Revised Site Assessment Work Plan	PMI	\$3,570.00
04	03/06/2019	Revised Interim Free Product Removal/Additional SAWP	PMI	\$62,675.84
05	04/16/2019	C.O. #1 to the Interim Free Product Removal/Additional SAWP	PMI	\$10,785.80
06	01/16/2020	Conditional approval of Revised 2nd Additional SAWP & CE	PMI	\$47,123.71
07	12/10/2021	Approval of CO #1-Value Engineering Review WP	AECOM	\$242.00
08	07/21/2021	Value Engineering Review	AECOM	\$16,052.00
09	12/28/2023	Approval of Revised CAP and C.E.	PMI	\$530,586.76
				<u>\$736,253.80</u>

# Approved Payments

23000021

230106

MAYFLOWER QUICK MART

<u>Date Approved</u>	<u>Amount</u>
2 /27/2018	\$6,190.74
1 /30/2019	\$63,465.03
10/30/2019	\$44,964.24
6 /24/2020	\$31,057.26
1 /27/2021	\$26,887.79
12/1 /2021	\$8,661.83
1 /25/2023	\$5,094.21
	<hr/>
	<b>\$186,321.10</b>
	<hr/>

**APPLICATION FOR REIMBURSEMENT**  
from the  
**PETROLEUM STORAGE TANK TRUST FUND**

(1) ADEQ Facility Identification Number: 23000021

(2) Responsible Party Information:

Company Name Mayflower Quick Mart

Contact Person Anil Gupta

Address P.O. Box 309

City and State Prescott, AR

Zip Code 71857

Phone (501) 470-1885

(3) Release Location

Facility Name Mayflower Quick Mart

Address 555 Hwy 365/Hwy 89

City and State Mayflower, AR

(4) Type of Tank (check only):

Aboveground

Underground

(5) Type of Product Released:

Gasoline

Kerosene

Jet Fuel

Diesel

Heating Oil

Aviation Gas

Used Motor Oil

Other

(list)

Date of Release 6/15/2016

Release (LUST) Number 23-0106

Facility ID# 23000021  
Date 01/11/24

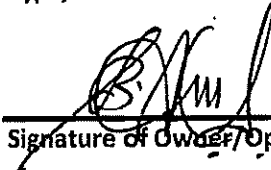
**CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I also certify that the amounts claimed for reimbursement under this application have been paid in full. I further certify that I have the authority to submit this application on behalf of

Mayflower Quick Mart

Anil Gupta

Type/Print name of Owner/Operator or Responsible Party



Signature of Owner/Operator or Responsible Party

**ACKNOWLEDGEMENT**

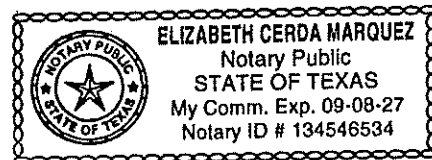
Sworn to and subscribed before me this 16 day of February, 2024.



Notary Public

My Commission Expires:

9/08/2027





Interim Request No.	8	<b>COST SUMMARY SHEET</b>				
Consultant /Responsible Party: Mayflower Quick Mart/ Anil Gupta						
Facility Identification #: 23000021			Facility Name: Mayflower Quick Mart			
Dates current costs incurred:	From	07/22/22	to	12/13/23	Request Date: 12/13/23	
<b>COST SUMMARY</b>						
<b>1. DIRECT LABOR COST (attach labor recap)</b>		<b>Hours</b>	<b>Actual Cost</b>			
Principal/Managerial		0.00	\$0.00			
Professional/Technical		89.00	\$3,848.60			
Support		10.50	\$244.34			
<b>Totals</b>		<b>99.50</b>	<b>\$4,092.94</b>			
<b>Total Actual Labor Costs x 3</b>				<b>\$12,278.82</b>		
<b>2. FIXED RATE COSTS (List by category - attach recap)</b>			<b>Actual Cost</b>			
Equipment Rental			\$0.00			
Per Diem (meals only, with documented overnight stay)			\$0.00			
Mileage			\$0.00			
Other			\$0.00			
<b>Total Fixed Rate Costs</b>				<b>\$0.00</b>		
<b>3. OTHER DIRECT COSTS (List by category - attach recap)</b>			<b>Actual Cost</b>			
Lodging			\$0.00			
Laboratory			\$0.00			
Subcontracts			\$0.00			
Supplies			\$0.00			
Other			\$0.00			
<b>Total Other Direct Costs</b>				<b>\$0.00</b>		
4. Reimbursement Preparation Cost for RA#(s) <u>8</u>			(\$500 or \$1000)	\$500.00		
<b>5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)</b>				<b>\$12,778.82</b>		
6. Markup on Total Other Direct Costs (maximum 20%)			Excess Profit	\$0.00		
<b>7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)</b>				<b>\$12,778.82</b>		
A. Total Reimbursement Requested to Date Including Above:				\$209,276.26		
B. Less Amount Deductible (\$25,000, \$15,000, or \$7,500)				\$7,500.00		
C. Less Amount Previously Retained/Disallowed by RST:				\$2,676.34		
D. Less Amount Previously Received (Reimbursed by ADEQ):				\$186,321.10		
E. Amount of this Request (same as line 7 above unless it is the 1st Request):				\$12,778.82		































# INVOICE

Little Rock, AR  
501-221-7122

Project Mgr: Richard Davis

**Project:** GUPT - Trust Fund - Mayflower Quick Mart  
555 Highway 365 & Highway 89  
Mayflower, AR

**To:** Anil Gupta  
Attn: Anil Gupta  
PO Box 309  
Prescott, AR 71857

REMIT TO:	
Invoice Number: TK06052	
Pollution Management, Inc. PO Box 959673 St. Louis, MO 63195-9673	
Federal E.I.N.: 71-0668874	

Project Number:	KT237090
Invoice Date:	9/30/2023
For Period:	7/09/2023 to 9/23/2023

Quantity	Description of Services	Rate	Total
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TASK: Task 1

**Direct Labor Costs**

4.00 Hour(s)	Item Date 8/16/23 - Senior Project Manager - Tony Scott Work Plan Prep Subcontractor bids	\$47.12	\$188.48 ✓
4.00 Hour(s)	Item Date 8/17/23 - Senior Project Manager - Tony Scott Work Plan Prep bids and excel spreadsheet	\$47.12	\$188.48 ✓
2.00 Hour(s)	Item Date 8/22/23 - Senior Project Manager - Tony Scott Work Plan Prep	\$47.12	\$94.24 ✓
2.00 Hour(s)	Item Date 8/23/23 - Senior Project Manager - Tony Scott work plan prep	\$47.12	\$94.24 ✓
2.00 Hour(s)	Item Date 8/24/23 - Senior Project Manager - Tony Scott work plan prep	\$47.12	\$94.24 ✓
2.00 Hour(s)	Item Date 9/19/23 - Senior Project Manager - Tony Scott Work Plan Prep Trucking Bids	\$47.12	\$94.24 ✓
1.00 Hour(s)	Item Date 9/20/23 - Senior Project Manager - Tony Scott Work Plan Prep Subcontractor bids	\$47.12	\$47.12 ✓
6.00 Hour(s)	Item Date 8/1/23 - Senior Geologist - Stan Rasburry Revised CAP preparation	\$42.24	\$253.44 ✓
4.00 Hour(s)	Item Date 8/2/23 - Senior Geologist - Stan Rasburry work on Revised Scope of Work and Cost Estimate for Revised CAP	\$42.24	\$168.96 ✓
5.50 Hour(s)	Item Date 8/3/23 - Senior Geologist - Stan Rasburry Prepare Revised Scope of Work and Cost Estimate	\$42.24	\$232.32 ✓
1.50 Hour(s)	Item Date 8/4/23 - Senior Geologist - Stan Rasburry work plan preparation	\$42.24	\$63.36 ✓
3.00 Hour(s)	Item Date 8/8/23 - Senior Geologist - Stan Rasburry Finalize Revised SOW and Cost Estimate for Revised CAP	\$42.24	\$126.72 ✓
4.00 Hour(s)	Item Date 8/10/23 - Senior Geologist - Stan Rasburry	\$42.24	\$168.96 ✓

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Invoice No.: TK06052  
 Project No.: KT237090  
 Project: GUPT - Trust Fund - Mayflower  
 Quick Mart  
 555 Highway 365 & Highway 89  
 Mayflower, AR

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

TASK: Task 1

**Direct Labor Costs**

site reconnaissance; work plan development

1.00 Hour(s)	Item Date 8/14/23 - Senior Geologist - Stan Rasburry Revised CAP preparation	\$42.24	\$42.24 ✓
1.00 Hour(s)	Item Date 8/15/23 - Senior Geologist - Stan Rasburry Revised CAP Development	\$42.24	\$42.24 ✓
2.00 Hour(s)	Item Date 8/30/23 - Senior Geologist - Stan Rasburry Revised CAP preparation	\$42.24	\$84.48 ✓
2.00 Hour(s)	Item Date 8/24/23 - Environmental Technician III - Danny Lloyd Prepare Revised Corrective Action Plan Drawings, Plot to PDF and Place in Project File	\$28.30	\$56.60 ✓

Total Labor \$2,040.36

3 Times Hourly Rate

Subtotal \$6,121.08

Task Total \$6,121.08

Mayflower Quick Mart  
 Facility ID: 23000021  
 LUST: 23-0106  
 AFIN: 23-00673

**Invoice Total \$6,121.08**

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Little Rock, AR  
501-221-7122

Project Mgr: Richard Davis

**Project:** GUPT - Trust Fund - Mayflower Quick Mart  
555 Highway 365 & Highway 89  
Mayflower, AR

**To:** Anil Gupta  
Attn: Anil Gupta  
PO Box 309  
Prescott, AR 71857

REMIT TO:	
Invoice Number: TK23216	
Pollution Management, Inc. PO Box 959673 St. Louis, MO 63195-9673	
Federal E.I.N.: 71-0668874	

Project Number:	KT237090
Invoice Date:	11/02/2023
For Period:	9/24/2023 to 10/21/2023

Quantity	Description of Services	Rate	Total
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TASK: Task 1

**Direct Labor Costs**

1.00 Hour(s)	Item Date 9/26/23 - Senior Project Manager - Tony Scott Work plan prep subcontractor bids	\$47.12	\$47.12 ✓
1.00 Hour(s)	Item Date 9/28/23 - Senior Project Manager - Tony Scott Work Plan Prep Subcontractor bids	\$47.12	\$47.12 ✓
1.00 Hour(s)	Item Date 10/2/23 - Senior Project Manager - Tony Scott work plan prep	\$47.12	\$47.12 ✓
2.00 Hour(s)	Item Date 10/3/23 - Senior Project Manager - Tony Scott work plan prep cost estimate and subcontractor quotes	\$47.12	\$94.24 ✓
2.00 Hour(s)	Item Date 10/4/23 - Senior Project Manager - Tony Scott work plan prep cost estimate and subcontractor quotes	\$47.12	\$94.24 ✓
2.00 Hour(s)	Item Date 10/2/23 - Senior Geologist - Stan Rasburry CAP preparation	\$42.24	\$84.48 ✓
2.00 Hour(s)	Item Date 10/3/23 - Senior Geologist - Stan Rasburry CAP preparation	\$42.24	\$84.48 ✓
2.00 Hour(s)	Item Date 10/5/23 - Senior Geologist - Stan Rasburry Revised CAP preparation	\$42.24	\$84.48 ✓
3.00 Hour(s)	Item Date 10/10/23 - Senior Geologist - Stan Rasburry Revised CAP preparation	\$42.24	\$126.72 ✓
4.00 Hour(s)	Item Date 10/12/23 - Senior Geologist - Stan Rasburry RCAP preparation	\$42.24	\$168.96 ✓
2.00 Hour(s)	Item Date 10/13/23 - Senior Geologist - Stan Rasburry CAP preparation	\$42.24	\$84.48 ✓
3.00 Hour(s)	Item Date 10/17/23 - Senior Geologist - Stan Rasburry Revised CAP preparation	\$42.24	\$126.72 ✓
3.00 Hour(s)	Item Date 10/19/23 - Senior Geologist - Stan Rasburry	\$42.24	\$126.72 ✓

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Invoice No.: TK23216  
 Project No.: KT237090  
 Project: GUPT - Trust Fund - Mayflower  
 Quick Mart  
 555 Highway 365 & Highway 89  
 Mayflower, AR

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

TASK: Task 1

Direct Labor Costs

Revised CAP preparation

4.00 Hour(s)	Item Date 10/20/23 - Senior Geologist - Stan Rasburry	\$42.24	\$168.96
prepare cost estimate and bid summary for RCAP			

3 Times Hourly Rate

Total Labor \$1,385.84

Subtotal \$4,157.52

Task Total \$4,157.52

Mayflower Quick Mart  
 Facility ID: 23000021  
 LUST: 23-0106  
 AFIN: 23-00673

**Invoice Total \$4,157.52**



# INVOICE

Little Rock, AR  
501-221-7122

Project Mgr: Richard Davis

**Project:** GUPT - Trust Fund - Mayflower Quick Mart  
555 Highway 365 & Highway 89  
Mayflower, AR

**To:** Anil Gupta  
Attn: Anil Gupta  
PO Box 309  
Prescott, AR 71857

REMIT TO:	
Invoice Number: TK37118	
Pollution Management, Inc. PO Box 959673 St. Louis, MO 63195-9673	
Federal E.I.N.: 71-0668874	

Project Number:	KT237090
Invoice Date:	11/30/2023
For Period:	10/22/2023 to 11/25/2023

Quantity	Description of Services	Rate	Total
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TASK: Task 1

**Direct Labor Costs**

5.00 Hour(s)	Item Date 10/23/23 - Senior Geologist - Stan Rasbury Revised CAP preparation	\$42.24	\$211.20 ✓
2.00 Hour(s)	Item Date 10/24/23 - Senior Geologist - Stan Rasbury finalize Revised CAP	\$42.24	\$84.48 ✓
1.00 Hour(s)	Item Date 10/30/23 - Senior Geologist - Stan Rasbury Finalize cost estimate and bid summary	\$42.24	\$42.24 ✓
2.00 Hour(s)	Item Date 11/2/23 - Senior Geologist - Stan Rasbury Final Revised CAP review	\$42.24	\$84.48 ✓
2.00 Hour(s)	Item Date 10/25/23 - Administrative Staff II - Terri Rasbury TASK 1 - Revised Corrective Action Plan	\$23.27	\$46.54 ✓
3.50 Hour(s)	Item Date 10/30/23 - Administrative Staff II - Terri Rasbury TASK 1 - Revised CAP	\$23.27	\$81.45 ✓
3.00 Hour(s)	Item Date 10/31/23 - Administrative Staff II - Terri Rasbury TASK 1 - Revised CAP	\$23.27	\$69.81 ✓
2.00 Hour(s)	Item Date 11/2/23 - Administrative Staff II - Terri Rasbury TASK 1 - Revised CAP	\$23.27	\$46.54 ✓

Total Labor \$666.74

3 Times Hourly Rate

Subtotal \$2,000.22

Task Total \$2,000.22

TERMS: DUE UPON PRESENTATION OF INVOICE





# INVOICE

Invoice No.: TK37118  
Project No.: KT237090  
Project: GUPT - Trust Fund - Mayflower  
Quick Mart  
555 Highway 365 & Highway 89  
Mayflower, AR

Project Mgr: Richard Davis

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Mayflower Quick Mart  
Facility ID: 23000021  
LUST: 23-0106  
AFIN: 23-00673

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<b>Invoice Total</b>	<b>\$2,000.22</b>
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# INVOICE

Little Rock, AR  
501-221-7122

Project Mgr: Richard Davis

**Project:** GUPT - Trust Fund - Mayflower Quick Mart  
555 Highway 365 & Highway 89  
Mayflower, AR

**To:** Anil Gupta  
Attn: Anil Gupta  
PO Box 309  
Prescott, AR 71857

<b>REMIT TO:</b>
<b>Invoice Number: TK45414</b>
<b>Pollution Management, Inc.</b>
<b>PO Box 959673</b>
<b>St. Louis, MO 63195-9673</b>
<b>Federal E.I.N.: 71-0668874</b>

<b>Project Number:</b>	KT237090
<b>Invoice Date:</b>	12/13/2023
<b>For Period:</b>	11/26/2023 to 12/09/2023

Quantity	Description of Services	Rate	Total
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TASK: General

**Direct Project Expenses**

1.00 Each	Item Date 12/13/23 - Application #8 Preparation Fee	\$500.00	\$500.00
		<b>Subtotal</b>	<b>\$500.00</b>
		<b>Task Total</b>	<b>\$500.00</b>

Mayflower Quick Mart  
Facility ID: 23000021  
LUST: 23-0106  
AFIN: 23-00673

**Invoice Total**                      **\$500.00**

**TERMS: DUE UPON PRESENTATION OF INVOICE**



# ARKANSAS

## ENERGY & ENVIRONMENT

### MEMORANDUM

**To:** *Matthew McShee 3/24/24*  
Jacqueline Trotta, Trust Fund Administrator  
Assessment & Remediation Program, Office of Land Resources

**Through:** Blake Whittle, P.G., Groundwater Branch Manager *BW 3/25/24*  
Joshua K. Stevens, P.G., Geologist Supervisor, Regulated Storage Tanks *JKS*  
A & R Program, OLR

**From:** Mikel R. Shinn, P.G. *M.R.S.*  
RST, A & R Program, OLR

**Date:** March 20, 2024

**Subject:** Technical Review of Reimbursement Application #8  
For Time Period: July 22, 2022 – December 13, 2023  
Amount Requested: \$12,778.82  
Mayflower Quick Mart ["Anil Gupta"]  
555 Highway 365 / Highway 89  
Mayflower, AR 72106  
ID #23000021      LUST #23-0106      AFIN: 23-00673

The following is in response to your memo to me dated March 12, 2024.

#### 1. Status of Release

- a) *At which step in the Subpart F process is the LUST case, i.e., Site Investigation, CAP, or FP Removal? – Corrective Action Plan - After completion of an Exposure Assessment on 11/17/20, OLR RST requested preparation and submittal of a Corrective Action Plan and Cost Estimate on 12/9/20. After submittal and review of multiple plans, a "Revised Corrective Action Plan" was submitted by Pollution Management, Inc. (PMI) on 11/3/23 and approved on 12/28/23. A Corrective Action Report is scheduled for submittal on 4/26/24.*
- b) *If the remedy has been selected, what are the clean-up goals? Identify any issues that may delay progress or resolution of the case. – Clean-up goals were established in the 11/17/20 OLR RST Exposure Assessment as follows:*

Source Control - To reduce the concentrations of petroleum contamination in groundwater to not more than 25 mg/L TPH-GRO and 5 mg/L TPH-DRO, with points of compliance to be monitoring wells located throughout the contaminated area and tank basin observation wells. An additional source control goal is elimination of free product to the maximum extent practicable.

Environmental – To eliminate the intermittent discharge of free product and contaminated groundwater onto the land surface. The effectiveness of environmental protection shall be verified by attainment of the source control goal.

Previous issues which have delayed progress have been resolved. The revised CAP approved on 12/28/23 includes removal of the UST system and extensive over-excavation, which is expected to be sufficient to achieve clean-up goals.

- c) *With the exception of investigation-derived wastes, if contaminated soil or ground water has been removed from the site, describe the quantity and type of contamination removed.* – A total of 110 gasoline-equivalent gallons of product and 18,280 gallons of water were removed from the site during two dewatering events and four 12-hour MDPE events.

## 2. Reimbursement Application

- a) *Briefly describe the activities for which reimbursement is requested and the specific work plan(s) or change order(s) (cost approvals) under which activities were authorized.* – Mr. Anil Gupta is requesting reimbursement for:
- Development and preparation of the *Revised Corrective Action Plan* approved on 12/28/23.
  - Preparation of the current Trust Fund Reimbursement Application #8 (\$500.00).
- b) *Identify any activity that may conflict with Reg. 12 or that was not pre-approved by the technical staff.* – No activity conflicts with Reg. 12 or unapproved activities were identified.
- c) *If you do not agree with the consultant's project summary, state the areas of disagreement. If the consultant's summary is incomplete, or no summary is provided, give a brief history of the project to date.* – Pollution Management, Inc. has provided an adequate project summary.

## 3. Maps & Graphs

- a) *If not provided by the consultant in the application, please attach site maps that identify the location of the site and the area of the release within the site.* – Adequate site maps are included in PMI's project summary.
- b) *Include any data and/or graphs that illustrate relevant environmental information in support of your summary.* - No additional data and/or graphs have been generated.



A **Terracon** Company

RECEIVED

MAR 12 2024

DEQ - RST

3512 S. Shackleford Road,  
Little Rock, AR 72205  
(501) 221-7122  
**PMICO.com | Terracon.com**

March 6, 2024

Arkansas Energy & Environment, Division of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

Attn: Jacqueline Trotta, Trust Fund Administrator

**Re:** Trust Fund Reimbursement App #8

Mayflower Quick Mart

555 Hwy 365/Hwy 89

Mayflower, AR 72106

Facility ID: 23000021

LUST #: 23-0106

AFIN: 23-00673

Dear Ms. Trotta:

Enclosed please find the Eighth Interim Application for Reimbursement under the Arkansas Petroleum Storage Tank Trust Fund Act which is being submitted on behalf of Mayflower Quick Mart.

Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

**Pollution Management, Inc., A Terracon Company**

*Melissa K. Duncan*

Melissa K. Duncan

CSR / Administrative Manager

**Enclosure:** Application #8

Cc: Anil Gupta

Job #: GUPT-10382 (KT237090)

Explore with us

## TRUST FUND STATUS REPORT

Anil Gupta  
Mayflower Quick Mart  
555 Highway 365  
Mayflower, Arkansas  
Facility ID #23000021 LUST #23-0106 AFIN: 23-00673  
July 22, 2022, through December 13, 2023

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The following Status Report was prepared for Mr. Anil Gupta, by Pollution Management Inc. (PMI) for the Mayflower Quick Mart facility located at 555 Highway 365 in Mayflower, Arkansas. This is the eighth (8<sup>th</sup>) reimbursement application request for this facility.

### Project Summary

On June 15, 2016, Arkansas Petroleum Services (APS) was on-site in response to a slow dispenser when they discovered fuel and water coming up out of the unleaded pump sump and from cracks in the pavement, due to high groundwater. APS notified The Arkansas Energy and Environment, Division of Environmental Quality (DEQ) of the fuel release at the time of discovery. The released fuel flowed from the tank pit into a drainage ditch on the east side of the property. PMI traveled to the site June 15, 2016, to inspect site conditions and install sorbent booms to prevent any additional runoff of product. An Initial Response Report (IRR) was submitted on June 24, 2016.

On July 11, 2016, PMI mobilized to the site to install soil borings and collect soil samples for chemical analysis, as part of an Initial Site Characterization (ISC). PMI submitted an ISC Report to the DEQ on July 21, 2016.

Between 2016 and 2020, several iterations of site assessment and interim free product removal were conducted. DEQ completed an Exposure Assessment and requested a Corrective Action Plan (CAP) on December 15, 2020. Prior to completing and submitting the final CAP, DEQ requested a Scope of Work (SOW) and Cost Estimate (CE) for review. PMI submitted the SOW and CE on January 19, 2021. The DEQ case manager requested revisions on February 2, 2021. PMI submitted a Revised SOW and CE on March 31, 2021. The Regulated Storage Tanks (RST) - Assessment and Remediation Program, Office of Land Resources (OLR) subsequently completed a review of the Revised SOW and identified concerns that the proposed corrective action was unlikely to economically attain the corrective action goals established in a November 17, 2020 Exposure Assessment.

On June 15, 2021 DEQ requested that State Contractor AECOM Technical Services conduct a Value Engineering Review of the PMI CAP "Revised Scope of Work" to assess the efficacy of the proposed remediation in meeting corrective action goals and to evaluate alternate effective and economical technologies. A Value Engineering Review report was received from AECOM on October 4, 2021. In correspondence dated February 28, 2022, DEQ concurred with AECOM's recommendations and requested that a Revised Corrective Action Plan and Cost Estimate be prepared which will ensure effective and economical achievement of the established corrective action goals. Due to an ongoing ARDOT project which entailed re-development of the Mayflower exit and property surrounding the Mayflower Quick Mart, the responsible party (RP) requested an extension of time for RCAP submittal. The request was based on a concern for changing traffic patterns and how it might affect business at

the facility. DEQ agreed to the initial extension and subsequent extensions based on the completion of the ARDOT project.

On August 8, 2023, PMI submitted a Revised Scope of Work and Cost Estimate for the Revised CAP. In email correspondence dated September 1, 2023, DEQ concurred with the RSOW, and a Revised CAP was submitted on November 2, 2023. The Revised CAP is currently under review.

Current Reimbursable Activities

Revised CAP and Cost Estimate (Approval Pending):	\$530,586.76
Previous Reimbursement Amount for Revised CAP:	\$5,094.21
Current Reimbursement Application Amount:	\$12,778.82

During the current reporting period, the following tasks were completed:

**Invoice #TK06052**                      **09/30/2023**

- Task 1 – Revised CAP Development

**Invoice #TK23216**                      **11/02/2023**

- Task 1 – Revised CAP Development

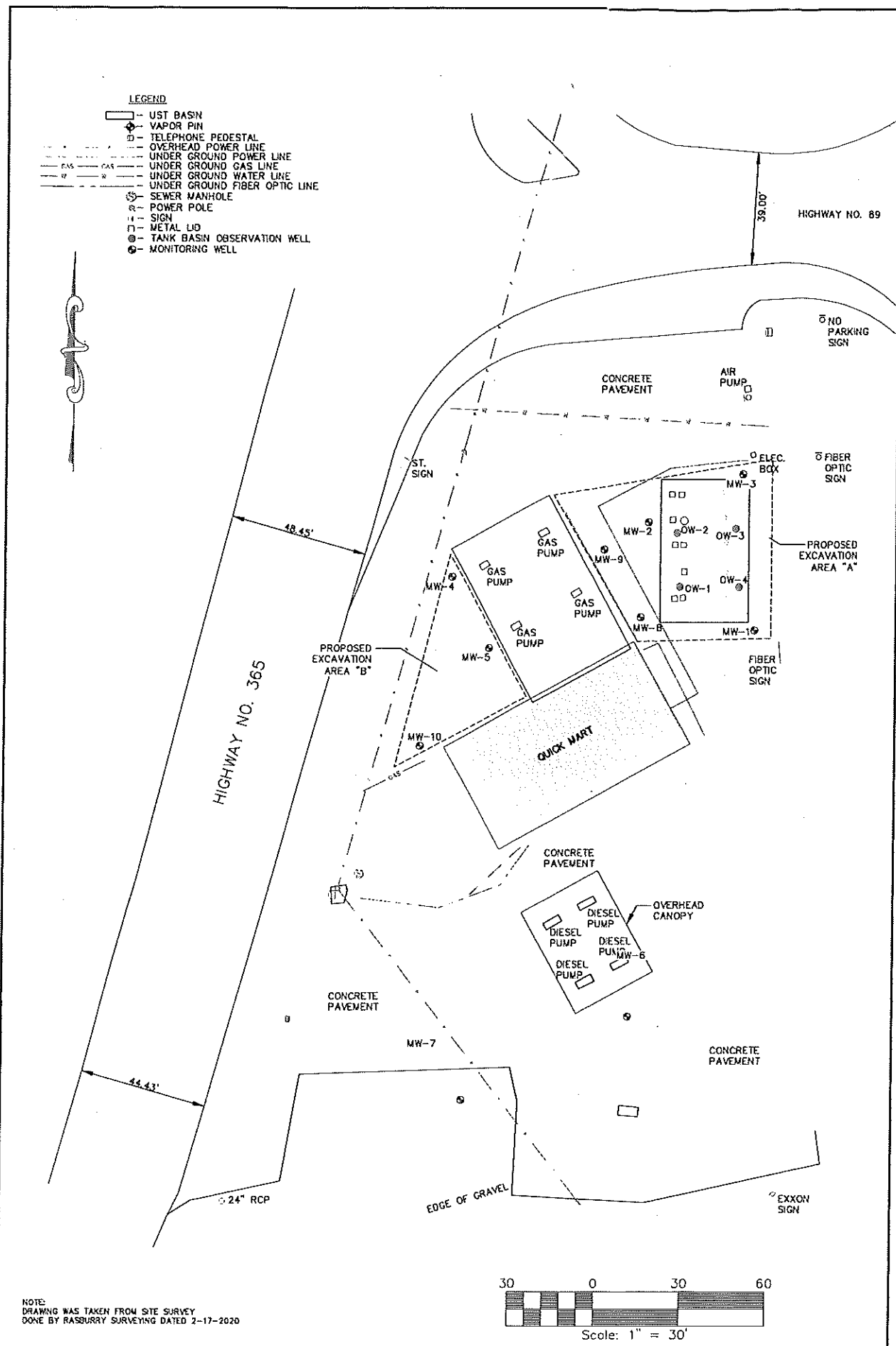
**Invoice #TK37118**                      **12/02/2023**

- Task 1 – Revised CAP Preparation

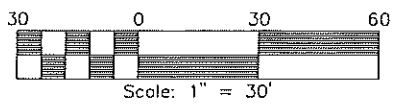
**Invoice #TK45414**                      **12/13/2023**

- Reimbursement Application #8 Fee

- LEGEND**
- - UST BASIN
  - ⊕ - VAPOR PIN
  - ⊙ - TELEPHONE PEDESTAL
  - - OVERHEAD POWER LINE
  - - UNDER GROUND POWER LINE
  - GAS --- GAS --- UNDER GROUND GAS LINE
  - W --- W --- UNDER GROUND WATER LINE
  - - - - - UNDER GROUND FIBER OPTIC LINE
  - ⊙ - SEWER MANHOLE
  - R - POWER POLE
  - ⊕ - SIGN
  - ⊕ - METAL LID
  - ⊙ - TANK BASIN OBSERVATION WELL
  - ⊙ - MONITORING WELL



NOTE:  
DRAWING WAS TAKEN FROM SITE SURVEY  
DONE BY RASBURY SURVEYING DATED 2-17-2020



<b>CIVIL ENGINEERING AND ENVIRONMENTAL SERVICES</b> 3512 South Shackleford Road Little Rock, Arkansas 72205 (501) 221-7192 fax (501) 221-7715	SUBMITTED: S. RASBURY DRAWN: D. LLOYD CHECKED: S. RASBURY DATE: AUGUST 24, 2023	REVISED CORRECTIVE ACTION PLAN MAYFLOWER QUICK MART 555 HIGHWAY 365 & HIGHWAY 89 MAYFLOWER, ARKANSAS	GENERAL SITE PLAN WITH PROPOSED EXCAVATION AREAS	JOB NUMBER: GUPT-10382 KT237080 DRAWING NUMBER: 2
	<small>FILE: N:\PROJECTS\USERDATA-A-L\OPTAL_AML\GUP-10382 - ENVIRONMENTAL SERVICES - MAYFLOWER QUICK MART\WORK PLANS\REVISED CAP AUGUST 2023\DRAWINGS\GUP-10382 REAP AUG 2023.DWG</small>			





# ARKANSAS

## ENERGY & ENVIRONMENT

### MEMORANDUM OF REVIEW Reimbursement Request Petroleum Storage Tank Trust Fund

From: Petroleum Storage Tank Trust Fund Staff

Date: May 29, 2024

Subject: **Forrest City Shell**  
**2335 North Washington Avenue**  
**Forrest City, AR**  
**ID #62000124 LUST #62-0012 AFIN 62-0007**

A request for reimbursement (#8) for costs incurred during remediation of an Underground Storage Tank (UST) site was received from the Responsible Party (RP) on March 4, 2024. The RP of this site submitted a request to reopen previously closed LUST #62-0012 (original notification date 05/17/96) on the basis that the release likely contributed to contamination currently being remediated under LUST #62-0059 (which has almost reached the maximum reimbursement limit). The name and the address of the RP:

**JayCo, Inc.**  
**Attn: Steve Reed**  
**P.O. Box 580**  
**Carlisle, AR 72024-0580**

The period covered by this application is May 13, 2023 through January 9, 2024. Remediation activities for which reimbursement is requested include: operation and maintenance costs associated with an Additional Corrective Action Plan (Amendment #2), Change Order request #1 and #2, and preparation of Reimbursement Application #8.

To date a total of 20,572 vapor-equivalent gallons of hydrocarbons have been removed by the SVE system. The remediation system does not produce significant quantities of groundwater, thus only liquid IDW has been removed and recycled during sampling events.

This application includes ten (10) invoices from Pollution Management, Inc., A Terracon Company (PMI) totaling **\$71,641.80**. Included in PMI/Terracon's invoices are charges from: Entergy (\$10,284.71), Field Environmental (\$1,467.21), MK Environmental (\$875.00), and Arkansas Analytical (\$590.00).

The consultant and the RST Case Manager have each prepared a summary of activities. (See attachments).

**RECOMMENDATION:**

The claimed cost of **\$71,641.80** was checked against documentation provided. Copies of the Cost Summary Sheet and all recap sheets provided by the RP are attached.

The staff recommends payment as follows:

<b>Claim filed- Form TF-1</b>	<b>\$ 71,641.80</b>
<b>Less: Deductible</b>	<b>- 00.00</b>
<b>Less: Adjustments</b>	<b>- <u>00.00</u></b>
<b>Total Net Claim</b>	<b><u>\$ 71,641.80</u></b>

It is recommended that the claim made by the RP be considered in the amount of **\$71,641.80**.

# Approved Payments

62000124

620012

FORREST CITY SHELL

Date Approved

Amount

5 /27/2020	\$67,368.08
9 /30/2020	\$68,738.58
4 /28/2021	\$52,994.95
1 /26/2022	\$62,374.09
5 /25/2022	\$3,104.06
12/7 /2022	\$22,924.80
8 /30/2023	\$342,969.30

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**\$620,473.86**

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# Approved Work Plans

62000124 62-0012 FORREST CITY SHELL

	<u>Date</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	06/06/2019	CAP Amendment WP	PMI	\$344,012.02
02	07/25/2019	CO#1 CAP Amendment	PMI	\$2,707.20
03	08/04/2020	Approval of C.O. 2-CAP Amendemnet	PMI	\$5,660.00
04	10/27/2022	Approval of CAP-Amendment #2 WP & C.E.	PMI	\$643,771.46
05	05/16/2023	CO #2-CAP-Amendment 2	PMI	\$40,431.48
06	03/09/2023	Approval of C.O. #1-CAP Amendment	PMI	\$2,536.14
				<hr/> <hr/> <u>\$1,039,118.30</u>

APPLICATION FOR REIMBURSEMENT  
from the  
PETROLEUM STORAGE TANK TRUST FUND

(1) ADEQ Facility Identification Number: 62000124

(2) Responsible Party Information:

Company Name JayCo, Inc.

Contact Person Steve Reed

Address P.O. Box 580

City and State Carlisle, AR

Zip Code 72024-0580

Phone 870-552-9616

(3) Release Location

Facility Name Forrest City Shell

Address 2335 North Washington Avenue

City and State Forrest City, AR

(4) Type of Tank (check only one):

Aboveground

Underground

(5) Type of Product Released:

Gasoline

Kerosene

Jet Fuel

Diesel

Heating Oil

Aviation Gas

Used Motor Oil

Other  (list) \_\_\_\_\_

Date of Release 12/30/2008

Release (LUST) Number 62-0012

Facility ID# 62000124  
Date 01/09/24

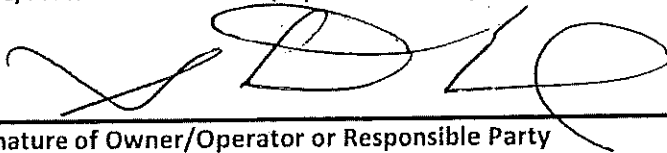
**CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I also certify that the amounts claimed for reimbursement under this application have been paid in full. I further certify that I have the authority to submit this application on behalf of

JayCo, Inc.

Steve Reed

Type/Print name of Owner/Operator or Responsible Party



Signature of Owner/Operator or Responsible Party

**ACKNOWLEDGEMENT**

Sworn to and subscribed before me this 11<sup>th</sup> day of January, 2024.



Notary Public

My Commission Expires:

OFFICIAL SEAL  
AARON HAYES  
SALINE COUNTY  
NOTARY PUBLIC - ARKANSAS  
My Commission Expires Sept. 12, 2032  
Commission No. 12390445

**PROOF OF PAYMENT AFFIDAVIT**

I, Richard T. Davis being of sound mind, am responsible to ensure this application is completed per regulatory requirements. I have personal knowledge of the contents of this document; all of which are true and correct to the best of my knowledge. Furthermore, as Principal of Pollution Management, Inc., I certify that, as of this date, Pollution Management, Inc. has been paid in full by JayCo, Inc. for the invoices contained in this reimbursement request:

Invoice Number	Invoice Date	Invoice Amount
50304	5/31/2023	\$3,762.35
50369	6/21/2023	\$4,080.67
50423	6/30/2023	\$2,940.45
50559	7/20/2023	\$607.08
TK06055A	1/9/2024	\$25,146.66
TK23268	11/2/2023	\$9,951.41
TK40795	12/4/2023	\$14,571.69
TK47659	12/19/2023	\$3,600.59
TK47694	12/19/2023	\$1,000.00
Total		\$65,660.90

*Cont'd →*

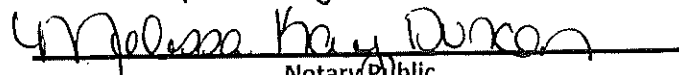
Signed this 14 day of February, 2024



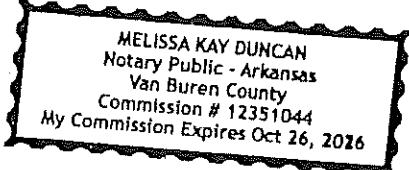
Richard T. Davis, Principal

**ACKNOWLEDGEMENT**

Sworn to and subscribed before me this 14<sup>th</sup> day of February, 2024.

  
 Notary Public

My Commission Expires: 10-26-2026







Interim Request No.	8	<b>COST SUMMARY SHEET</b>				
Consultant /Responsible Party: PMI/Steve Reed @ JayCo, Inc.						
Facility Identification #: 62000124.		Facility Name: Forrest City Shell				
Dates current costs incurred:	From	05/13/23	to	01/09/24	Request Date: 01/09/24	
<b>COST SUMMARY</b>						
<b>1. DIRECT LABOR COST (attach labor recap)</b>		<b>Hours</b>	<b>Actual Cost</b>			
Principal/Managerial		0.00	\$0.00			
Professional/Technical		387.50	\$15,152.24			
Support		39.50	\$916.60			
<b>Totals</b>		<b>427.00</b>	<b>\$16,068.84</b>			
Total Actual Labor Costs x 3					<b>\$48,206.52</b>	
<b>2. FIXED RATE COSTS (List by category - attach recap)</b>				<b>Actual Cost</b>		
Equipment Rental				\$1,530.00		
Per Diem (meals only, with documented overnight stay)				\$0.00		
Mileage				\$4,618.60		
Other				\$0.00		
Total Fixed Rate Costs					<b>\$6,148.60</b>	
<b>3. OTHER DIRECT COSTS (List by category - attach recap)</b>				<b>Actual Cost</b>		
Lodging				\$0.00		
Laboratory				\$590.00		
Subcontracts				\$884.69		
Supplies				\$345.63		
Other				\$11,751.92		
Total Other Direct Costs					<b>\$13,572.23</b>	
4. Reimbursement Preparation Cost for RA#(s)		8	(\$500 or \$1000)		<b>\$1,000.00</b>	
5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)					<b>\$68,927.35</b>	
6. Markup on Total Other Direct Costs (maximum 20%)					<b>\$2,714.45</b>	
7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)					<b>\$71,641.80</b>	
A. Total Reimbursement Requested to Date Including Above:					<b>\$718,009.66</b>	
B. Less Amount Deductible (\$25,000, \$15,000, or \$7,500)					<b>\$25,000.00</b>	
C. Less Amount Previously Retained/Disallowed by RST:					<b>\$894.00</b>	
D. Less Amount Previously Received (Reimbursed by ADEQ):					<b>\$620,473.86</b>	
E. Amount of this Request (same as line 7 above unless it is the 1st Request):					<b>\$71,641.80</b>	



Consultant /Responsible Party: PMI/Steve Reed @ JayCo, Inc.

Facility Identification # 62000124 Facility Name: Forrest City Shell

Dates costs incurred: From 05/13/23 to 01/09/24 Request date: 01/09/24

**DIRECT LABOR COST DETAIL**

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
<b>PROFESSIONAL/TECHNICAL:</b>						
05/31/23	50304	D. D. Lloyd	Task 7	2.50	\$26.90	\$67.25
05/31/23	50304	J. S. Rasburry	Task 7	4.00	\$38.09	\$152.36
05/31/23	50304	J. S. Rasburry	Task 3	9.00	\$38.09	\$342.81
05/31/23	50304	Paul B Matthews	Task 3	11.00	\$26.52	\$291.72
06/21/23	50369	J. S. Rasburry	Task 3	15.00	\$38.09	\$571.35
06/21/23	50369	J. S. Rasburry	Task 7	1.00	\$38.09	\$38.09
06/21/23	50369	Matthew Marbury	Task 3	6.00	\$34.88	\$209.28
06/21/23	50369	Paul B Matthews	Task 3	8.00	\$26.52	\$212.16
06/30/23	50423	J. S. Rasburry	Task 3	12.00	\$38.09	\$457.08
07/20/23	50559	J. S. Rasburry	Task 3	4.00	\$38.09	\$152.36
09/30/23	TK06055	J. S. Rasburry	Task 3	21.00	\$42.24	\$887.04
09/30/23	TK06055	Matt Marbury	Task 3	33.50	\$37.11	\$1,243.19
09/30/23	TK06055	Kiefer Vaughn	Task 3	6.50	\$34.86	\$226.59
09/30/23	TK06055	J. S. Rasburry	Task 4	5.00	\$42.24	\$211.20
09/30/23	TK06055	Matt Marbury	Task 4	17.00	\$37.11	\$630.87
09/30/23	TK06055	Kiefer Vaughn	Task 4	16.00	\$34.86	\$557.76
09/30/23	TK06055	Matt Marbury	Task 6	2.00	\$37.11	\$74.22
09/30/23	TK06055	J. S. Rasburry	Task 7	37.00	\$42.24	\$1,562.88
09/30/23	TK06055	J. S. Rasburry	TF Meeting	1.00	\$42.24	\$42.24
11/02/23	TK23268	J. S. Rasburry	Task 3	31.00	\$42.24	\$1,309.44
11/02/23	TK23268	Matthew Marbury	Task 3	5.00	\$37.11	\$185.55
11/02/23	TK23268	J. S. Rasburry	Task 7	10.50	\$42.24	\$443.52
11/02/23	TK23268	D. D. Lloyd	Task 7	2.50	\$28.30	\$70.75
12/04/23	TK40795	J. S. Rasburry	Task 3	33.00	\$42.24	\$1,393.92
12/04/23	TK40795	J. S. Rasburry	Task 4	22.00	\$42.24	\$929.28
12/04/23	TK40795	Kiefer Vaughn	Task 4	10.00	\$34.86	\$348.60
12/04/23	TK40795	J. S. Rasburry	Task 7	18.50	\$42.24	\$781.44
12/19/23	TK47659	J. S. Rasburry	Task 3	6.00	\$42.24	\$253.44
12/19/23	TK47659	J. S. Rasburry	Task 6	1.00	\$42.24	\$42.24
12/19/23	TK47659	Paul B Matthews	Task 6	4.00	\$27.93	\$111.72
12/19/23	TK47659	J. S. Rasburry	Task 7	11.50	\$42.24	\$485.76
						\$0.00

<b>ADDITIONAL PROF/TECH COSTS (from the Extra Direct Labor Page):</b>	<b>21.00</b>		<b>\$866.13</b>
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<b>TOTAL PROFESSIONAL/TECHNICAL COSTS:</b>	<b>387.50</b>		<b>\$15,152.24</b>
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Consultant /Responsible Party:	PMI/Steve Reed @ JayCo, Inc.
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Facility Identification # 62000124	Facility Name: Forrest City Shell
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Dates costs incurred:	From	05/13/23	to	01/09/24	Request date: 01/09/24
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<b>FIXED RATE COSTS DETAIL</b>
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DATE	INVOICE#	ROUTE AND WORK PLAN TASK	# OF MILES	RATE	AMOUNT
<b>MILEAGE:</b>					
05/10/23	50304	B Matthews: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
05/12/23	50304	B Matthews: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
06/01/23	50369	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
06/13/23	50369	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
06/01/23	50369	M Marbury: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
06/06/23	50369	B Matthews: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
06/22/23	50423	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
06/28/23	50423	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
07/20/23	TK06055	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
07/26/23	TK06055	M Marbury: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
					\$0.00
08/09/23	TK06055	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
08/16/23	TK06055	M Marbury: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
08/21/23	TK06055	M Marbury: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
08/28/23	TK06055	M Marbury: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
09/06/23	TK06055	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
09/15/23	TK06055	M Marbury: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
09/19/23	TK06055	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
08/17/23	TK06055	M Marbury: To/From Job Site: Task 4	202.00	\$0.70	\$141.40
08/18/23	TK06055	M. Marbury: To/From Lab: Task 4	24.00	\$0.70	\$16.80
10/04/23	TK23268	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
10/09/23	TK23268	M Marbury: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
10/18/23	TK23268	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
10/25/23	TK40795	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
10/31/23	TK40795	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
11/08/23	TK40795	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
11/15/23	TK40795	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
11/22/23	TK40795	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
11/20/23	TK40795	S. Rasburry: To/From Job Site: Task 4	202.00	\$0.70	\$141.40
11/21/23	TK40795	S. Rasburry: To/From Job Site: Task 4	202.00	\$0.70	\$141.40
11/29/23	TK47659	S. Rasburry: To/From Job Site: Task 3	202.00	\$0.70	\$141.40
12/01/23	TK47659	B Matthews: To/From Disposal: T6	110.00	\$0.70	\$77.00

<b>ADDITIONAL MILEAGE COSTS (from the Extra Fixed Rate Costs page):</b>	\$424.20
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<b>TOTAL MILEAGE COSTS:</b>	<b>\$4,618.60</b>
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# Pollution Management, Inc.

3512 S. Shackleford Rd  
 Little Rock, AR 72205-  
 Tel: 501-221-7122 Fax: 501-221-7775  
 www.pmico.com

JayCo, Inc.  
 P. O. Box 580  
 Carlisle, AR 72024

Steve Reed

**Contract:** MRSI-5054:  
 TF - Forrest City Shell

**Invoice Number:** 50304  
**Date:** 5/31/23  
**Billing Manager:** Richard Davis  
**Client ID:** JAYC

TF--Forrest City Shell  
 2335 North Washington  
 Forrest City, AR 72335  
 Facility ID #62000124  
 Lust #62-0012

**Labor**

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>
<b>D. D. Lloyd</b> Drafting	Task #7 Prepare AS/SVE System Start-up Drawings and Figures, Plot to PDF and Place in Project File 5/18/23	2.50	\$80.70	\$201.75
Employee Subtotal		2.50		201.75
<b>J. S. Rasbury</b> Professional/Technical Service	Task 7 - report preparation 5/2/23	2.00	\$114.27	\$228.54
Coordinate Site Operations	Task 3 - Coordinate system run operations 5/3/23	1.00	\$114.27	\$114.27
Professional/Technical Service	Task 7 - report preparation 5/3/23	2.00	\$114.27	\$228.54
Professional/Technical Service	Task 3 - system run 5/16/23	4.00	\$114.27	\$457.08
Coordinate Site Operations	Task 3 - Coordinate O&M operations 5/24/23	2.00	\$114.27	\$228.54
Coordinate Site Operations	Task 3 - coordinate O&M operations 5/31/23	2.00	\$114.27	\$228.54
Employee Subtotal		13.00		1,485.51
<b>Paul B. Matthews</b> Field Services	Task 3: System O and M 5/10/23	7.00	\$79.56	\$556.92
Field Services	Task 3: Repaired high temp alarm on system. 5/12/23	4.00	\$79.56	\$318.24
Employee Subtotal		11.00		875.16
Labor Subtotal		26.50		2,562.42
			<b>Labor Total:</b>	<b>2,562.42</b>

**Reimbursable**

<b>Energy</b> Utilities T3 4/18/23-5/17/23	180006084416	5/19/23	1.00	490.86	490.86
<b>MK Environmental, Inc.</b> Subcontractor T3	32672	5/1/23	1.00	150.00	150.00
<b>Visa Business</b> T3 - Material East Ark Industrial	EastMM42723	4/27/23	1.00	39.25	39.25





# Pollution Management, Inc.

3512 S. Shackleford Rd  
 Little Rock, AR 72205-  
 Tel: 501-221-7122 Fax: 501-221-7775  
 www.pmico.com

JayCo, Inc.  
 P. O. Box 580  
 Carlisle, AR 72024

**Invoice Number:** 50369  
**Date:** 6/21/23  
**Billing Manager:** Richard Davis  
**Client ID:** JAYC

Steve Reed

**Contract:** MRSI-5054;  
 TF - Forrest City Shell

KT 237126

TF - Forrest City Shell  
 2335 North Washington  
 Forrest City, AR 72335  
 Facility ID #62000124  
 Lust #62-0012

**Labor**

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>	
<b>J. S. Rasbury</b> Professional/Technical Service	Task 3 - System O&M; troubleshoot AWS alarm; correct problem; collect system data	6/1/23	9.00	\$114.27	\$1,028.43
Professional/Technical Service	Task 7 - Installation/Start-up Report	6/5/23	1.00	\$114.27	\$114.27
Coordinate Site Operations	Task 3 - coordinate O&M operations	6/8/23	1.00	\$114.27	\$114.27
Professional/Technical Service	Task 3 - perform week system O&M	6/13/23	5.00	\$114.27	\$571.35
Employee Subtotal			16.00		1,828.32
<b>Matthew W. Marbury</b> System Maintenance	Task 3: System O&M	6/1/23	6.00	\$104.64	\$627.84
Employee Subtotal			6.00		627.84
<b>Paul B. Matthews</b> System Maintenance	Task 3: System O and M.	6/6/23	8.00	\$79.56	\$636.48
Employee Subtotal			8.00		636.48
<b>Terri L. Rasbury</b> Document Preparation	TASK 7 - SVE/AS System Installation Start-up Report	6/6/23	2.50	\$67.38	\$168.45
Document Preparation	TASK 7 - SVE/AS System Installation Start-up Report	6/7/23	0.50	\$67.38	\$33.69
Work on Project Data	TASK 7 - System Daily Reports	6/12/23	0.50	\$67.38	\$33.69
Employee Subtotal			3.50		235.83
Labor Subtotal			33.50		3,328.47
				<b>Labor Total:</b>	<b>3,328.47</b>

**Reimbursable**

<b>MK Environmental, Inc.</b> Subcontractor T3	32781	6/5/23	1.00	150.00	150.00
<b>Stanley Rasbury</b> Materials T3	ExpRep SR 060123	6/1/23	1.00	36.60	36.60
Mileage 6/1/23	ExpRep SR 052923a	6/5/23	202.00	0.70	141.40

JayCo, Inc.  
P. O. Box 580  
Carlisle, AR 72024

Steve Reed

**Contract:** MRSI-5054:  
TF - Forrest City Shell

**Invoice Number:** 50369

**Date:** 6/21/23

**Billing Manager:** Richard Davis

**Client ID:** JAYC

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TF - Forrest City Shell  
2335 North Washington  
Forrest City, AR 72335  
Facility ID #62000124  
Lust #62-0012

<u>Employee/Activity</u>		<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>
Mileage T3 6/13/23	ExpRep SR 061923	6/19/23	202.00	0.70	141.40
	Reimbursable Subtotal				<u>469.40</u>
<b>PMI Equip</b>					
Matthew W. Marbury 2021 GMC Siera Task 3		6/1/23	202.00	0.70	141.40
Paul B. Matthews 10 GMC Sierra		6/6/23	202.00	0.70	141.40
	PMI Equip Subtotal				<u>282.80</u>

**Amount Due This Invoice**

**\$4,080.67**

*This invoice is due upon receipt*

# Pollution Management, Inc.

3512 S. Shackleford Rd  
 Little Rock, AR 72205-  
 Tel: 501-221-7122 Fax: 501-221-7775  
 www.pmico.com

JayCo, Inc.  
 P. O. Box 580  
 Carlisle, AR 72024

**Invoice Number:** 50423  
**Date:** 6/30/23  
**Billing Manager:** Richard Davis  
**Client ID:** JAYC

Steve Reed

**Contract:** MRSI-5054:  
 TF - Forrest City Shell

TF - Forrest City Shell  
 2335 North Washington  
 Forrest City, AR 72335  
 Facility ID #62000124  
 Lust #62-0012

**Labor**

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>	
<b>J. S. Rasburry</b>					
Coordinate Site Operations	Task 3 - coordinate O&M operations	6/21/23	1.00	\$114.27	\$114.27
Professional/Technical Service	Task 3 - Conduct weekly System O&M; extend/re-pipe Air-sparge intake above roofline	6/22/23	5.00	\$114.27	\$571.35
Professional/Technical Service	Task 3 - coordinate O&M operations	6/26/23	1.00	\$114.27	\$114.27
Professional/Technical Service	Task 3 - Perform weekly System O&M	6/28/23	5.00	\$114.27	\$571.35
Employee Subtotal			12.00		1,371.24
Labor Subtotal			12.00		1,371.24
<b>Labor Total:</b>					<b>1,371.24</b>

**Reimbursable**

<b>Entergy</b>					
Utilities T3 5/17/23-6/16/23	295005976610	6/20/23	1.00	1,196.41	1,196.41
<b>J. S. Rasburry</b>					
FID Meter - Task 3		6/28/23	1.00	90.00	90.00
<b>Stanley Rasburry</b>					
6.22.23 - T3 - To/From Little Rock to job site for	ExpRepSR6262	6/26/23	202.00	0.70	141.40
	023				
T3 - 6.28.23 To/From Office/Job Site, System	ExpRepSR6302	6/30/23	202.00	0.70	141.40
	023				
Reimbursable Subtotal					1,569.21

**Amount Due This Invoice**

**\$2,940.45**

*This invoice is due upon receipt*

# Pollution Management, Inc.

3512 S. Shackleford Rd  
Little Rock, AR 72205-  
Tel: 501-221-7122 Fax: 501-221-7775  
www.pmico.com

JayCo, Inc.  
P. O. Box 580  
Carlisle, AR 72024

**Invoice Number:** 50559  
**Date:** 7/20/23  
**Billing Manager:** Richard Davis  
**Client ID:** JAYC

Steve Reed

**Contract:** MRSI-5054:  
TF - Forrest City Shell

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TF - Forrest City Shell  
2335 North Washington  
Forrest City, AR 72335  
Facility ID #62000124  
Lust #62-0012

## Labor

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>
J. S. Rasburry Professional/Technical Service      Task 3, System O&M	7/13/23	4.00	\$114.27	\$457.08
	Employee Subtotal	<u>4.00</u>		<u>457.08</u>
	Labor Subtotal	<u>4.00</u>		<u>457.08</u>
			<b>Labor Total:</b>	<b>457.08</b>

## Reimbursable

MK Environmental, Inc. T3 - Site Optimization Software      32930	7/3/23	1.00	150.00	150.00
	Reimbursable Subtotal			<u>150.00</u>

**Amount Due This Invoice** **\$607.08**  
*This invoice is due upon receipt*



# INVOICE

Adjusted on 1/09/2024

Little Rock, AR  
501-221-7122

Project Mgr: Richard Davis

**Project:** MRSI - Trust Fund - Forrest City Shell  
2335 North Washington  
Forrest City, AR 72335

**To:** Jayco Inc.  
Attn: Steve Reed  
PO Box 580  
Carlisle, AR 72024

REMIT TO:	
Invoice Number:	TK06055A
Original Invoice:	TK06055
Pollution Management, Inc.	
PO Box 959673	
St. Louis, MO 63195-9673	
Federal E.I.N.:	71-0668874

Project Number:	KT237126
Invoice Date:	1/09/2024
For Period:	7/09/2023 to 9/23/2023

Quantity	Description of Services	Rate	Total
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Previous Items

TASK: Task 3

Direct Labor Costs

5.00 Hour(s)	Item Date 7/20/23 - Senior Geologist - Stan Rasbury Perform weekly AS/SVE system O&M	\$42.24	\$211.20
5.00 Hour(s)	Item Date 8/9/23 - Senior Geologist - Stan Rasbury Perform weekly SVE/AS System O&M	\$42.24	\$211.20
2.00 Hour(s)	Item Date 8/28/23 - Senior Geologist - Stan Rasbury Troubleshoot system down time/restart issues with MK and onsite personnel	\$42.24	\$84.48
4.00 Hour(s)	Item Date 9/6/23 - Senior Geologist - Stan Rasbury weekly O&M system run	\$42.24	\$168.96
5.00 Hour(s)	Item Date 9/19/23 - Senior Geologist - Stan Rasbury Perform weekly AS/SVE system O&M	\$42.24	\$211.20
6.00 Hour(s)	Item Date 7/26/23 - Field Supervisor - Matt Marbury Task 3 - System O&M	\$37.11	\$222.66
2.50 Hour(s)	Item Date 8/1/23 - Field Supervisor - Matt Marbury Tsk 3 - System Run	\$37.11	\$92.78
1.00 Hour(s)	Item Date 8/16/23 - Field Supervisor - Matt Marbury System Run	\$37.11	\$37.11
2.00 Hour(s)	Item Date 8/17/23 - Field Supervisor - Matt Marbury System Run	\$37.11	\$74.22
8.00 Hour(s)	Item Date 8/21/23 - Field Supervisor - Matt Marbury Task 3 - System Run	\$37.11	\$296.88
8.00 Hour(s)	Item Date 8/28/23 - Field Supervisor - Matt Marbury Task 3 - System O&M	\$37.11	\$296.88
6.00 Hour(s)	Item Date 9/15/23 - Field Supervisor - Matt Marbury	\$37.11	\$222.66

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Adjusted on 1/09/2024

Invoice No.: TK06055A  
 Project No.: KT237126  
 Project: MRSI - Trust.Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
Continued			
Previous Items			
TASK: Task 3			
Direct Labor Costs			
	TASK 3 - Data Management System Daily Reports		
0.50 Hour(s)	Item Date 9/5/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$11.64
	TASK 3 - Data Management of System Daily Reports		
0.25 Hour(s)	Item Date 9/6/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data management of System Daily Reports		
0.25 Hour(s)	Item Date 9/7/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management of System Daily Reports		
0.25 Hour(s)	Item Date 9/8/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data management - System daily reports		
0.50 Hour(s)	Item Date 9/11/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$11.64
	TASK 3 - Data Management of System Daily Reports		
0.25 Hour(s)	Item Date 9/12/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management of System Daily Reports		
0.25 Hour(s)	Item Date 9/13/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management of Daily System Reports		
0.25 Hour(s)	Item Date 9/14/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management of System Daily Reports		
0.25 Hour(s)	Item Date 9/15/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data management - system daily reports		
0.50 Hour(s)	Item Date 9/18/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$11.64
	TASK 3 - Data Management - System Daily Reports		
0.25 Hour(s)	Item Date 9/19/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK3 - Data Management System Daily Reports		
0.25 Hour(s)	Item Date 9/20/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management, System Daily Reports		
0.25 Hour(s)	Item Date 9/21/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management - System Daily Reports		
0.25 Hour(s)	Item Date 9/22/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management - System Daily Reports		
		Total Labor	\$2,554.70
	3 Times Hourly Rate		
		Subtotal	\$7,664.10

Direct Project Expenses

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Adjusted on 1/09/2024

Invoice No.: TK06055A  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
Continued			
Previous Items			
TASK: Task 3			
Direct Project Expenses			
202.00 Mile(s)	Item Date 7/20/23 - Personal Mileage JSR:Travel to and from LR office and job site in Forrest City, AR	\$0.700	\$141.40
202.00 Mile(s)	Item Date 7/26/23 - Company Mileage MM:Travel to and from LR office and job site in Forrest City, AR	\$0.700	\$141.40
202.00 Mile(s)	Item Date 8/1/23 - Company Mileage MM:Travel to and from LR office and job site in Forrest City, AR	\$0.700	\$141.40
\$125.00 Cost+	Item Date 8/1/23 - Miscellaneous - Special Use MK Environmental Inc; Inv# 33058..SITE OPTIMIZATION SOFTWARE	20%	\$150.00
\$1,806.76 Cost+	Item Date 8/3/23 - Miscellaneous Expense Inv# 010060866609..ACI*ENTERGY SERVICES, LLC - Utility bill	20%	\$2,168.11
1.00 Each	Item Date 8/9/23 - FID Meter	\$90.00	\$90.00
202.00 Mile(s)	Item Date 8/9/23 - Personal Mileage JSR:Travel to and from LR office and job site in Forrest City, AR	\$0.700	\$141.40
202.00 Mile(s)	Item Date 8/16/23 - Company Mileage MM:Travel to and from LR office and job site in Forrest City, AR	\$0.700	\$141.40
1.00 Each	Item Date 8/16/23 - Special Supplies (Corp Approval Required) <i>Drum</i>	\$75.00	\$75.00
202.00 Mile(s)	Item Date 8/21/23 - Company Mileage MM:Travel to and from LR office and job site in Forrest City, AR	\$0.700	\$141.40
1.00 Each	Item Date 8/23/23 - FID Meter FID Meter; 1 @ 90.00	\$90.00	\$90.00
\$1,682.94 Cost+	Item Date 8/25/23 - Miscellaneous Expense Inv# 010061274965..ACI*ENTERGY SERVICES, LLC - Utility Charge	20%	\$2,019.53
202.00 Mile(s)	Item Date 8/28/23 - Company Mileage MM:Travel to and from LR office and job site in Forrest City, AR	\$0.700	\$141.40
\$125.00 Cost+	Item Date 9/1/23 - Miscellaneous - Special Use MK Environmental Inc; Inv# 33182..SITE OPTIMIZATION SOFTWARE	20%	\$150.00
1.00 Each	Item Date 9/5/23 - FID Meter FID Meter; 1 @ 90.00	\$90.00	\$90.00
202.00 Mile(s)	Item Date 9/6/23 - Personal Mileage JSR:Travel to and from LR office and job site in Forrest City, AR	\$0.700	\$141.40
202.00 Mile(s)	Item Date 9/15/23 - Company Mileage	\$0.700	\$141.40
1.00 Each	Item Date 9/15/23 - PID Meter PID Meter; 1 @ 75.00	\$75.00	\$75.00

TERMS: DUE UPON PRESENTATION OF INVOICE





# INVOICE

Adjusted on 1/09/2024

Invoice No.: TK06055A  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

Previous Items

TASK: Task 3

Direct Project Expenses

202.00 Mile(s)	Item Date 9/19/23 - Personal Mileage JSR:Travel to and from LR office and job site in Forrest City, AR	\$0.700	\$141.40
		<b>Subtotal</b>	<b>\$6,321.64</b>
		<b>Task Total</b>	<b>\$13,985.74</b>

TASK: Task 4

Direct Labor Costs

2.00 Hour(s)	Item Date 8/2/23 - Senior Geologist - Stan Rasburry Coordinate quarterly groundwater monitoring	\$42.24	\$84.48
2.00 Hour(s)	Item Date 8/3/23 - Senior Geologist - Stan Rasburry coordinate quarterly wellhead PID monitoring	\$42.24	\$84.48
1.00 Hour(s)	Item Date 8/7/23 - Senior Geologist - Stan Rasburry Coordinate quarterly monitoring and sampling	\$42.24	\$42.24
8.00 Hour(s)	Item Date 8/16/23 - Field Supervisor - Matt Marbury PID Readings	\$37.11	\$296.88
8.00 Hour(s)	Item Date 8/17/23 - Field Supervisor - Matt Marbury GW Sampling	\$37.11	\$296.88
1.00 Hour(s)	Item Date 8/18/23 - Field Supervisor - Matt Marbury Equipment Shipping & Sample Delivery	\$37.11	\$37.11
8.00 Hour(s)	Item Date 8/16/23 - Project Geologist - Kiefer Vaughn PID Gauging	\$34.86	\$278.88
8.00 Hour(s)	Item Date 8/17/23 - Project Geologist - Kiefer Vaughn GW Sampling	\$34.86	\$278.88
		<b>Total Labor</b>	<b>\$1,399.83</b>
3 Times Hourly Rate		<b>Subtotal</b>	<b>\$4,199.49</b>

Direct Project Expenses

54.90 Each	Item Date 8/16/23 - Special Supplies (Corp Approval Required) Peristaltic Pump Tubing; 1 @ 3.05 Poly Tubing 1/4"; 10 @ 0.19 Peristaltic Pump Tubing; 1 @ 3.05	\$1.20	\$65.88
✓	Interface Probe; 1 @ 45.00 - <i>Credit for markup issued on page 8</i>		

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Adjusted on 1/09/2024

Invoice No.: TK06055A  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

Previous Items

TASK: Task 4

Direct Project Expenses

Poly Tubing 1/4"; 10 @ 0.19

202.00 Mile(s)	Item Date 8/17/23 - Company Mileage MM:Travel to and from LR office and job site in Forrest City, AR	\$0.700	\$141.40
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24.00 Mile(s)	Item Date 8/18/23 - Company Mileage MM:Travel for Sample Deliveries	\$0.700	\$16.80
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\$1,049.37 Cost+	Item Date 8/28/23 - Contract Labor Field Environmental Instruments Inc; Inv# PS-INV2315402..Groundwater/Vapor Sampling Equipment Field Environmental Instruments Inc; Inv# PS-INV2315403..Groundwater/Vapor Sampling Equipment Field Environmental Instruments Inc; Inv# PS-INV2315402..Groundwater/Vapor Sampling Equipment Field Environmental Instruments Inc; Inv# PS-INV2315403..Groundwater/Vapor Sampling Equipment	20%	\$1,259.24
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**Subtotal**      **\$1,483.32**

**Task Total**      **\$5,682.81**

TASK: Task 5

Direct Project Expenses

\$295.00 Cost+	Item Date 8/26/23 - Contract Lab Services Arkansas Analytical, Inc.; Inv# K23AUG466..BTEX, MTBE Arkansas Analytical, Inc.; Inv# K23AUG466..SAMPLE HANDLING	20%	\$354.00
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**Subtotal**      **\$354.00**

**Task Total**      **\$354.00**

TASK: Task 6

Direct Labor Costs

2.00 Hour(s)	Item Date 8/18/23 - Field Supervisor - Matt Marbury Liquid Disposal	\$37.11	\$74.22
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Total Labor      \$74.22

3 Times Hourly Rate

**Subtotal**      **\$222.66**

Direct Project Expenses

1.00 Each	Item Date 8/16/23 - Special Supplies (Corp Approval Required) Drum Open Top (55 Gal); 1 @ 75.00	\$75.00	\$75.00
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TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Adjusted on 1/09/2024

Invoice No.: TK06055A  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

Previous Items

TASK: Task 6

Direct Project Expenses

\$4.24 Cost+	Item Date 8/18/23 - Miscellaneous Expense WASTEWATER SPECIALTIES 18-AUG-23 010061210558 01006121055800020000 Marbury, Matt Purged GW Disposal	20%	\$5.09
		<b>Subtotal</b>	<b>\$80.09</b>
		<b>Task Total</b>	<b>\$302.75</b>

TASK: Task 7

Direct Labor Costs

1.00 Hour(s)	Item Date 7/26/23 - Senior Geologist - Stan Rasburry prepare data for CAM #25	\$42.24	\$42.24
3.00 Hour(s)	Item Date 7/27/23 - Senior Geologist - Stan Rasburry prepare data for CAM #25	\$42.24	\$126.72
2.00 Hour(s)	Item Date 7/28/23 - Senior Geologist - Stan Rasburry prepare data for CAM #25	\$42.24	\$84.48
3.00 Hour(s)	Item Date 8/9/23 - Senior Geologist - Stan Rasburry CAM #25 Report preparation	\$42.24	\$126.72
2.00 Hour(s)	Item Date 8/18/23 - Senior Geologist - Stan Rasburry Review data for CAM #25	\$42.24	\$84.48
2.00 Hour(s)	Item Date 8/21/23 - Senior Geologist - Stan Rasburry Work on CAM #25 Report	\$42.24	\$84.48
1.50 Hour(s)	Item Date 8/23/23 - Senior Geologist - Stan Rasburry Work on CAM #25 Report	\$42.24	\$63.36
1.00 Hour(s)	Item Date 8/28/23 - Senior Geologist - Stan Rasburry Review lab data for CAM #25	\$42.24	\$42.24
2.00 Hour(s)	Item Date 8/29/23 - Senior Geologist - Stan Rasburry Prepare data for CAM 25	\$42.24	\$84.48
2.00 Hour(s)	Item Date 8/30/23 - Senior Geologist - Stan Rasburry prepare data for CAM #25	\$42.24	\$84.48
1.50 Hour(s)	Item Date 9/6/23 - Senior Geologist - Stan Rasburry prepare data for CAM #25	\$42.24	\$63.36
4.00 Hour(s)	Item Date 9/19/23 - Senior Geologist - Stan Rasburry CAM #25 report preparation	\$42.24	\$168.96
7.00 Hour(s)	Item Date 9/20/23 - Senior Geologist - Stan Rasburry CAM #25 report preparation	\$42.24	\$295.68

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Adjusted on 1/09/2024

Invoice No.: TK06055A  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

Previous Items

TASK: Task 7

Direct Labor Costs

3.00 Hour(s)	Item Date 9/21/23 - Senior Geologist - Stan Rasburry update tables, graphs and drawings for CAM #25 Report	\$42.24	\$126.72
2.00 Hour(s)	Item Date 9/22/23 - Senior Geologist - Stan Rasburry CAM #25 report preparation	\$42.24	\$84.48
		Total Labor	\$1,562.88
3 Times Hourly Rate			
		Subtotal	\$4,688.64
		Task Total	\$4,688.64

TASK: Trust Fund Meeting

Direct Labor Costs

1.00 Hour(s)	Item Date 8/30/23 - Senior Geologist - Stan Rasburry present Reimbursement Application Status Report to Trust Fund Committee	\$42.24	\$42.24
		Total Labor	\$42.24
3 Times Hourly Rate			
		Subtotal	\$126.72
		Task Total	\$126.72
		Previous Items Total	\$25,140.66

Adjustment Items

TASK: Task 4

Direct Project Expenses

1.00 Each	Item Date 8/16/23 - Record Interface Probe without Markup	\$45.00	\$45.00
-\$45.00 Cost+	Item Date 8/16/23 - Special Supplies (Corp Approval Required)	20%	\$(54.00)
Interface Probe Markup Credit			
		Subtotal	\$(9.00)
		Task Total	\$(9.00)

TASK: Task 6

Direct Project Expenses

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Adjusted on 1/09/2024

Invoice No.: TK06055A  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
Continued			
Adjustment Items			
TASK: Task 6			
Direct Project Expenses			
\$75.00 Cost+	Item Date 8/16/23 - Record Drums with Markup	20%	\$90.00
-1.00 Each	Item Date 8/16/23 - Special Supplies (Corp Approval Required)	\$75.00	\$(75.00)
	Drum Open Top (55 Gal); Adjustment to Apply Markup		
		Subtotal	\$15.00
		Task Total	\$15.00
		Adjustment Items Total	\$6.00

Forrest City Shell  
 ID #: 620000124  
 LUST: 62-0012  
 AFIN: 62-0007

**Invoice Total \$25,146.66**



# INVOICE

Little Rock, AR  
501-221-7122

Project Mgr: Richard Davis

**Project:** MRSI - Trust Fund - Forrest City Shell  
2335 North Washington  
Forrest City, AR 72335

**To:** Jayco Inc.  
Attn: Steve Reed  
PO Box 580  
Carlisle, AR 72024

REMIT TO:	
Invoice Number:	TK23268
Pollution Management, Inc.	
PO Box 959673	
St. Louis, MO 63195-9673	
Federal E.I.N.:	71-0668874

Project Number:	KT237126
Invoice Date:	11/02/2023
For Period:	9/24/2023 to 10/21/2023

Quantity	Description of Services	Rate	Total
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TASK: Task 3

**Direct Labor Costs**

1.00 Hour(s)	Item Date 9/26/23 - Senior Geologist - Stan Rasburry coordinate O&M operations	\$42.24	\$42.24
5.00 Hour(s)	Item Date 9/27/23 - Senior Geologist - Stan Rasburry weekly AS/SVE system O&M	\$42.24	\$211.20
1.00 Hour(s)	Item Date 10/2/23 - Senior Geologist - Stan Rasburry Coordinate O&M operations	\$42.24	\$42.24
5.00 Hour(s)	Item Date 10/4/23 - Senior Geologist - Stan Rasburry Perform weekly O&M system run	\$42.24	\$211.20
2.00 Hour(s)	Item Date 10/5/23 - Senior Geologist - Stan Rasburry coordinate O&M operations	\$42.24	\$84.48
2.00 Hour(s)	Item Date 10/6/23 - Senior Geologist - Stan Rasburry Coordinate site operations	\$42.24	\$84.48
7.00 Hour(s)	Item Date 10/9/23 - Senior Geologist - Stan Rasburry research noise reduction devices for SVE/AS system Perform System O&M	\$42.24	\$295.68
1.00 Hour(s)	Item Date 10/10/23 - Senior Geologist - Stan Rasburry additional research on noise control for SVE.AS system	\$42.24	\$42.24
2.00 Hour(s)	Item Date 10/16/23 - Senior Geologist - Stan Rasburry Coordinate O&M operations	\$42.24	\$84.48
5.00 Hour(s)	Item Date 10/18/23 - Senior Geologist - Stan Rasburry perform weekly O&M	\$42.24	\$211.20
5.00 Hour(s)	Item Date 10/9/23 - Field Supervisor - Matt Marbury Task 3 - System O&M	\$37.11	\$185.55
0.50 Hour(s)	Item Date 9/25/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - System Daily Reports	\$23.27	\$11.64

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Invoice No.: TK23268  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

**TASK: Task 3**

**Direct Labor Costs**

0.25 Hour(s)	Item Date 9/26/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 9/27/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - System Daily Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 9/28/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - System Daily Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 9/29/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - System Daily Reports	\$23.27	\$5.82
0.50 Hour(s)	Item Date 10/2/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$11.64
0.25 Hour(s)	Item Date 10/3/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - System Daily Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 10/4/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 10/5/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 10/6/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.50 Hour(s)	Item Date 10/9/23 - Administrative Staff II - Terri Rasburry Data Management - System Daily Reports	\$23.27	\$11.64
0.25 Hour(s)	Item Date 10/10/23 - Administrative Staff II - Terri Rasburry TASK 3 - Document Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 10/11/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - System Daily Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 10/12/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - System Daily Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 10/13/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.50 Hour(s)	Item Date 10/16/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$11.64
0.25 Hour(s)	Item Date 10/17/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 10/18/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 10/19/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Invoice No.: TK23268  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

**TASK: Task 3**

**Direct Labor Costs**

0.25 Hour(s) Item Date 10/20/23 - Administrative Staff II - Terri Rasbury \$23.27 \$5.82  
 TASK 3 - Data Management - System Daily Reports

Total Labor \$1,634.67

3 Times Hourly Rate

Subtotal \$4,904.01

**Direct Project Expenses**

\$1,934.74 Cost+ Item Date 9/28/23 - Miscellaneous - Special Use 20% \$2,321.69  
 Drafts; Inv# 236105..ENERGY ; UTILITES

1.00 Each Item Date 10/4/23 - FID Meter \$90.00 \$90.00

202.00 Mile(s) Item Date 10/4/23 - Personal Mileage \$0.700 \$141.40

Travel to and from PMI Little Rock office and job site in Forrest City, AR

202.00 Mile(s) Item Date 10/9/23 - Company Mileage \$0.700 \$141.40

Matt Marbury

1.00 Each Item Date 10/9/23 - FID Meter \$90.00 \$90.00

1.00 Each Item Date 10/18/23 - FID Meter \$90.00 \$90.00

202.00 Mile(s) Item Date 10/18/23 - Personal Mileage \$0.700 \$141.40

travel to and from Little Rock PMI office and Forrest City for system run

Subtotal \$3,015.89

Task Total \$7,919.90

**TASK: Task 7**

**Direct Labor Costs**

2.00 Hour(s) Item Date 9/25/23 - Senior Geologist - Stan Rasbury \$42.24 \$84.48  
 CAM #25 report preparation

2.50 Hour(s) Item Date 9/26/23 - Senior Geologist - Stan Rasbury \$42.24 \$105.60  
 CAM #25 Report Preparation

1.00 Hour(s) Item Date 9/27/23 - Senior Geologist - Stan Rasbury \$42.24 \$42.24  
 CAM #25 Report Preparation

2.00 Hour(s) Item Date 9/28/23 - Senior Geologist - Stan Rasbury \$42.24 \$84.48  
 Finalize CAM #25

1.00 Hour(s) Item Date 10/2/23 - Senior Geologist - Stan Rasbury \$42.24 \$42.24  
 final report review

2.00 Hour(s) Item Date 10/18/23 - Senior Geologist - Stan Rasbury \$42.24 \$84.48  
 Prepare data for CAM #26 Report

TERMS: DUE UPON PRESENTATION OF INVOICE





# INVOICE

Invoice No.: TK23268  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

TASK: Task 7

Direct Labor Costs

2.50 Hour(s)	Item Date 9/26/23 - Environmental Technician III - Danny Lloyd Prepare CAM #25 Drawings and Maps, Plot to PDF and Place in Project File	\$28.30	\$70.75
3.00 Hour(s)	Item Date 9/28/23 - Administrative Staff II - Terri Rasburry TASK 7 - Corrective Action Monitoring Report #25	\$23.27	\$69.81
2.50 Hour(s)	Item Date 10/2/23 - Administrative Staff II - Terri Rasburry TASK 7 - CAM Report #25	\$23.27	\$58.18
1.50 Hour(s)	Item Date 10/3/23 - Administrative Staff II - Terri Rasburry TASK 7 - Corrective Action Monitoring Report #25	\$23.27	\$34.91

Total Labor \$677.17

3 Times Hourly Rate

Subtotal \$2,031.51

Task Total \$2,031.51

Forrest City Shell  
 ID #: 620000124  
 LUST: 62-0012  
 AFIN: 62-0007

**Invoice Total \$9,951.41**



# INVOICE

Adjusted on 1/09/2024

Invoice No.: TK06055A  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

Previous Items

TASK: Task 3

Direct Labor Costs

System O&M

2.50 Hour(s)	Item Date 8/1/23 - Project Geologist - Kiefer Vaughn	\$34.86	\$87.15
1.00 Hour(s)	Item Date 8/8/23 - Project Geologist - Kiefer Vaughn	\$34.86	\$34.86
	Task 3 - Coordinate Sampling Event		
1.00 Hour(s)	Item Date 8/16/23 - Project Geologist - Kiefer Vaughn	\$34.86	\$34.86
	System check / O&M		
2.00 Hour(s)	Item Date 8/17/23 - Project Geologist - Kiefer Vaughn	\$34.86	\$69.72
	System Restart O&M		
0.25 Hour(s)	Item Date 8/11/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	Data Management of System Daily Reports		
0.50 Hour(s)	Item Date 8/14/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$11.64
	Data Management of System Daily Reports		
0.25 Hour(s)	Item Date 8/15/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	Data Management of System Daily Reports		
0.25 Hour(s)	Item Date 8/16/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	Task 3 - Data Management of System Daily Reports		
0.25 Hour(s)	Item Date 8/17/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management - System Daily Reports		
0.50 Hour(s)	Item Date 8/21/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$11.64
	TASK 3 - Data Management of System Daily Reports		
0.25 Hour(s)	Item Date 8/22/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management of System Daily Reports		
0.25 Hour(s)	Item Date 8/23/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management of System Daily Reports		
0.25 Hour(s)	Item Date 8/24/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management - System Daily Reports		
0.25 Hour(s)	Item Date 8/25/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management of System Daily Reports		
0.50 Hour(s)	Item Date 8/28/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$11.64
	TASK 3 - Data Management System Daily Reports		
0.25 Hour(s)	Item Date 8/29/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management Daily System Reports		
0.25 Hour(s)	Item Date 8/30/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management System Daily Reports		
0.25 Hour(s)	Item Date 8/31/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Little Rock, AR  
501-221-7122

Project Mgr: Richard Davis

**Project:** MRSI - Trust Fund - Forrest City Shell  
2335 North Washington  
Forrest City, AR 72335

**To:** Jayco Inc.  
Attn: Steve Reed  
PO Box 580  
Carlisle, AR 72024

REMIT TO:
Invoice Number: TK40795
Pollution Management, Inc. PO Box 959673 St. Louis, MO 63195-9673
Federal E.I.N.: 71-0668874

Project Number:	KT237126
Invoice Date:	12/04/2023
For Period:	10/22/2023 to 11/25/2023

Quantity	Description of Services	Rate	Total
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**TASK: Task 3**

**Direct Labor Costs**

2.00 Hour(s)	Item Date 10/23/23 - Senior Geologist - Stan Rasburry coordinate O&M operations	\$42.24	\$84.48
5.00 Hour(s)	Item Date 10/25/23 - Senior Geologist - Stan Rasburry perform weekly O&M	\$42.24	\$211.20
5.00 Hour(s)	Item Date 10/31/23 - Senior Geologist - Stan Rasburry Perform weekly AS/SVE system run	\$42.24	\$211.20
1.00 Hour(s)	Item Date 11/1/23 - Senior Geologist - Stan Rasburry coordinate site operations; remote re-start system	\$42.24	\$42.24
2.00 Hour(s)	Item Date 11/6/23 - Senior Geologist - Stan Rasburry coordinate operations	\$42.24	\$84.48
5.00 Hour(s)	Item Date 11/8/23 - Senior Geologist - Stan Rasburry Weekly System Run	\$42.24	\$211.20
1.00 Hour(s)	Item Date 11/10/23 - Senior Geologist - Stan Rasburry coordinate O&M operations	\$42.24	\$42.24
2.00 Hour(s)	Item Date 11/14/23 - Senior Geologist - Stan Rasburry coordinate SVE muffler installation for noise control	\$42.24	\$84.48
4.00 Hour(s)	Item Date 11/15/23 - Senior Geologist - Stan Rasburry perform weekly System O&M	\$42.24	\$168.96
2.00 Hour(s)	Item Date 11/16/23 - Senior Geologist - Stan Rasburry coordinate operations	\$42.24	\$84.48
4.00 Hour(s)	Item Date 11/22/23 - Senior Geologist - Stan Rasburry Perform weekly system O&M	\$42.24	\$168.96
0.50 Hour(s)	Item Date 10/23/23 - Administrative Staff II - Terri Rasburry Data Management - Daily System Reports	\$23.27	\$11.64
0.25 Hour(s)	Item Date 10/24/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Invoice No.: TK40795  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
Continued			
TASK: Task 3			
Direct Labor Costs			
	TASK 3 - Data Management - Daily System Reports		
0.25 Hour(s)	Item Date 10/25/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.50 Hour(s)	Item Date 10/30/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$11.64
0.25 Hour(s)	Item Date 10/31/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - System Daily Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 11/1/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 11/2/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 11/3/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.50 Hour(s)	Item Date 11/6/23 - Administrative Staff II - Terri Rasburry Data Management - Daily System Reports	\$23.27	\$11.64
0.25 Hour(s)	Item Date 11/7/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 11/8/23 - Administrative Staff II - Terri Rasburry Task 3 - Data Management - Daily System Report	\$23.27	\$5.82
0.25 Hour(s)	Item Date 11/9/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 11/10/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.50 Hour(s)	Item Date 11/13/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$11.64
0.25 Hour(s)	Item Date 11/14/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 11/15/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management -- Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 11/16/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 11/17/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - System Daily Reports	\$23.27	\$5.82
0.50 Hour(s)	Item Date 11/20/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$11.64
0.25 Hour(s)	Item Date 11/21/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Invoice No.: TK40795  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
Continued			
TASK: Task 3			
Direct Labor Costs			
	TASK 3 - Data Management - Daily System Reports		
0.25 Hour(s)	Item Date 11/22/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management - Daily System Reports		
		Total Labor	\$1,545.24
	3 Times Hourly Rate		
		Subtotal	\$4,635.72
Direct Project Expenses			
✓ 1.00 Each	Item Date 10/25/23 - FID Meter	\$90.00	\$90.00
	FID Meter		
202.00 Mile(s)	Item Date 10/25/23 - Personal Mileage	\$0.700	\$141.40
	JSR:travel to and from PMI Little Rock office to job site in Forrest City		
\$1,819.34 Cost+	Item Date 10/30/23 - Miscellaneous - Special Use	20%	\$2,183.21
	ENTERGY : UTILITIES		
✓ 1.00 Each	Item Date 10/31/23 - FID Meter	\$90.00	\$90.00
	FID Meter		
202.00 Mile(s)	Item Date 10/31/23 - Personal Mileage	\$0.700	\$141.40
	JSR: Travel to and from Little Rock PMI office to job site in Forrest City		
\$125.00 Cost+	Item Date 11/1/23 - Project Supplies & Equipment	20%	\$150.00
	MK Environmental Inc; Inv# 33446		
✓ 1.00 Each	Item Date 11/8/23 - FID Meter	\$90.00	\$90.00
	FID Meter		
202.00 Mile(s)	Item Date 11/8/23 - Personal Mileage	\$0.700	\$141.40
	JSR:Travel to and from Little Rock PMI office and job site in Forrest City		
1.00 Each	Item Date 11/15/23 - FID Meter	\$90.00	\$90.00
	FID Meter		
202.00 Mile(s)	Item Date 11/15/23 - Mileage - Stan Rasburry	\$0.700	\$141.40
	JSR: Office-Site-Office		
202.00 Mile(s)	Item Date 11/22/23 - Personal Mileage	\$0.700	\$141.40
	JSR:Travel to and from Little Rock PMI office and job site in Forrest City, AR		
		Subtotal	\$3,400.21
		Task Total	\$8,035.93

TASK: Task 4

Direct Labor Costs

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Invoice No.: TK40795  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

**TASK: Task 4**

**Direct Labor Costs**

✓ 1.00 Hour(s)	Item Date 11/2/23 - Senior Geologist - Stan Rasburry Coordinate quarterly PID wellhead monitoring operations	\$42.24	\$42.24
✓ 1.00 Hour(s)	Item Date 11/3/23 - Senior Geologist - Stan Rasburry Coordinate quarterly groundwater sampling operations	\$42.24	\$42.24
✓ 2.00 Hour(s)	Item Date 11/14/23 - Senior Geologist - Stan Rasburry Coordinate quarterly PID wellhead monitoring and groundwater sampling	\$42.24	\$84.48
✓ 9.00 Hour(s)	Item Date 11/20/23 - Senior Geologist - Stan Rasburry Perform quarterly PID wellhead monitoring	\$42.24	\$380.16
✓ 9.00 Hour(s)	Item Date 11/21/23 - Senior Geologist - Stan Rasburry Perform Quarterly Groundwater Sampling	\$42.24	\$380.16
✓ 1.00 Hour(s)	Item Date 11/16/23 - Project Geologist - Kiefer Vaughn Task 4 - Order Equipment for GW Sampling	\$34.86	\$34.86
✓ 9.00 Hour(s)	Item Date 11/21/23 - Project Geologist - Kiefer Vaughn Task 4 - GW sampling activities	\$34.86	\$313.74
		<b>Total Labor</b>	<b>\$1,277.88</b>
3 Times Hourly Rate		<b>Subtotal</b>	<b>\$3,833.64</b>

**Direct Project Expenses**

202.00 Mile(s)	Item Date 11/20/23 - Personal Mileage JSR:Travel to and from Little Rock PMI office and job site in Forrest City, AR	\$0.700	\$141.40
1.00 Each	Item Date 11/20/23 - PID Meter PID Meter	\$75.00	\$75.00
202.00 Mile(s)	Item Date 11/21/23 - Personal Mileage JSR:Travel to and from Little Rock PMI office and job site in Forrest City, AR	\$0.700	\$141.40
		<b>Subtotal</b>	<b>\$357.80</b>
		<b>Task Total</b>	<b>\$4,191.44</b>

**TASK: Task 7**

**Direct Labor Costs**

✓ 2.00 Hour(s)	Item Date 10/24/23 - Senior Geologist - Stan Rasburry Prepare data for CAM #26	\$42.24	\$84.48
✓ 2.00 Hour(s)	Item Date 10/31/23 - Senior Geologist - Stan Rasburry Prepare data for CAM #26 Report	\$42.24	\$84.48
✓ 2.00 Hour(s)	Item Date 11/2/23 - Senior Geologist - Stan Rasburry	\$42.24	\$84.48

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Invoice No.: TK40795  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

TASK: Task 7

**Direct Labor Costs**

	Prepare data for CAM #26 Report		
✓ 2.00 Hour(s)	Item Date 11/3/23 - Senior Geologist - Stan Rasburry	\$42.24	\$84.48
	Prepare data for CAM #26 Report		
✓ 2.00 Hour(s)	Item Date 11/6/23 - Senior Geologist - Stan Rasburry	\$42.24	\$84.48
	prepare data for CAM #26 Report		
✓ 1.00 Hour(s)	Item Date 11/8/23 - Senior Geologist - Stan Rasburry	\$42.24	\$42.24
	Prepare data for CAM #26 Report		
✓ 2.00 Hour(s)	Item Date 11/9/23 - Senior Geologist - Stan Rasburry	\$42.24	\$84.48
	prepare data for CAM #26 Report		
2.00 Hour(s)	Item Date 11/10/23 - Senior Geologist - Stan Rasburry	\$42.24	\$84.48
	prepare data for CAM #26 Report		
1.50 Hour(s)	Item Date 11/17/23 - Senior Geologist - Stan Rasburry	\$42.24	\$63.36
	Prepare data for CAM #26 Report		
2.00 Hour(s)	Item Date 11/22/23 - Senior Geologist - Stan Rasburry	\$42.24	\$84.48
	prepare data for CAM #26 Report		
		Total Labor	\$781.44
	3 Times Hourly Rate		
		Subtotal	\$2,344.32
		Task Total	\$2,344.32

Forrest City Shell  
 ID #: 620000124  
 LUST: 62-0012  
 AFIN: 62-0007

<b>Invoice Total</b>	<b>\$14,571.69</b>
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# INVOICE

Little Rock, AR  
501-221-7122

Project Mgr: Richard Davis

**Project:** MRSI - Trust Fund - Forrest City Shell  
2335 North Washington  
Forrest City, AR 72335

**To:** Jayco Inc.  
Attn: Steve Reed  
PO Box 580  
Carlisle, AR 72024

REMIT TO:
Invoice Number: TK47659
Pollution Management, Inc. PO Box 959673 St. Louis, MO 63195-9673
Federal E.I.N.: 71-0668874

Project Number:	KT237126
Invoice Date:	12/19/2023
For Period:	11/26/2023 to 12/02/2023

Quantity	Description of Services	Rate	Total
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**TASK: Task 3**

**Direct Labor Costs**

1.00 Hour(s)	Item Date 11/27/23 - Senior Geologist - Stan Rasburry coordinate installation of SVE muffler	\$42.24	\$42.24
5.00 Hour(s)	Item Date 11/29/23 - Senior Geologist - Stan Rasburry Perform weekly system O&M	\$42.24	\$211.20
0.50 Hour(s)	Item Date 11/27/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$11.64
0.25 Hour(s)	Item Date 11/28/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 11/29/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 11/30/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 12/1/23 - Administrative Staff II - Terri Rasburry TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82

Total Labor \$288.36

3 Times Hourly Rate

**Subtotal \$865.08**

**Direct Project Expenses**

1.00 Each	Item Date 11/29/23 - FID Meter	\$90.00	\$90.00
202.00 Mile(s)	Item Date 11/29/23 - Personal Mileage Stan Rasburry - Travel to/from job site	\$0.700	\$141.40

**Subtotal \$231.40**

**TERMS: DUE UPON PRESENTATION OF INVOICE**





# INVOICE

Invoice No.: TK47659  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

Task Total      \$1,096.48

**TASK: Task 4**

**Direct Project Expenses**

\$417.84 Cost+	Item Date 11/28/23 - Equipment Rental Field Environmental Instruments Inc; Inv# PS-INV2322276..Equipment Rental	20%	\$501.41
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Subtotal      \$501.41

Task Total      \$501.41

**TASK: Task 6**

**Direct Labor Costs**

1.00 Hour(s)	Item Date 12/1/23 - Senior Geologist - Stan Rasburry coordinate liquid waste disposal	\$42.24	\$42.24
4.00 Hour(s)	Item Date 12/1/23 - Driller/Exploration Team Member II - Brad Matthews Took wastewater to disposal	\$27.93	\$111.72

Total Labor      \$153.96

3 Times Hourly Rate

Subtotal      \$461.88

**Direct Project Expenses**

110.00 Mile(s)	Item Date 12/1/23 - Company Mileage BM:Delivered wastewater for disposal	\$0.700	\$77.00
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\$5.45 Cost+	Item Date 12/1/23 - Future Energy Services Brad Matthews paid by personal cc	20%	\$6.54
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Subtotal      \$83.54

Task Total      \$545.42

**TASK: Task 7**

**Direct Labor Costs**

3.00 Hour(s)	Item Date 11/27/23 - Senior Geologist - Stan Rasburry CAM #26 Report preparation	\$42.24	\$126.72
3.00 Hour(s)	Item Date 11/28/23 - Senior Geologist - Stan Rasburry Update graphs for CAM #26	\$42.24	\$126.72
4.00 Hour(s)	Item Date 11/30/23 - Senior Geologist - Stan Rasburry CAM #26 Report preparation	\$42.24	\$168.96
1.50 Hour(s)	Item Date 12/1/23 - Senior Geologist - Stan Rasburry	\$42.24	\$63.36

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Invoice No.: TK47659  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

TASK: Task 7

Direct Labor Costs

finalize CAM #26 Report

3 Times Hourly Rate

Total Labor \$485.76

Subtotal \$1,457.28

Task Total \$1,457.28

Forrest City Shell  
 ID #: 620000124  
 LUST: 62-0012  
 AFIN: 62-0007

**Invoice Total \$3,600.59**



# INVOICE

Little Rock, AR  
501-221-7122

Project Mgr: Richard Davis

**Project:** MRSI - Trust Fund - Forrest City Shell  
2335 North Washington  
Forrest City, AR 72335

**To:** Jayco Inc.  
Attn: Steve Reed  
PO Box 580  
Carlisle, AR 72024

<b>REMIT TO:</b>
<b>Invoice Number: TK56530</b>
<b>Pollution Management, Inc.</b>
<b>PO Box 959673</b>
<b>St. Louis, MO 63195-9673</b>
<b>Federal E.I.N.: 71-0668874</b>

<b>Project Number:</b>	KT237126
<b>Invoice Date:</b>	1/02/2024
<b>For Period:</b>	12/10/2023 to 12/23/2023

Quantity	Description of Services	Rate	Total
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**TASK: Task 3**

**Direct Labor Costs**

1.50 Hour(s)	Item Date 12/4/23 - Senior Geologist - Stan Rasbury Coordinate O&M operations	\$42.24	\$63.36
5.00 Hour(s)	Item Date 12/7/23 - Senior Geologist - Stan Rasbury perform weekly system O&M	\$42.24	\$211.20
1.00 Hour(s)	Item Date 12/12/23 - Senior Geologist - Stan Rasbury coordinate site operations	\$42.24	\$42.24
4.00 Hour(s)	Item Date 12/14/23 - Senior Geologist - Stan Rasbury perform weekly system O&M	\$42.24	\$168.96
0.50 Hour(s)	Item Date 12/4/23 - Administrative Staff II - Terri Rasbury TASK 3 - Data Management - System Daily Reports	\$23.27	\$11.64
0.25 Hour(s)	Item Date 12/5/23 - Administrative Staff II - Terri Rasbury TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 12/6/23 - Administrative Staff II - Terri Rasbury TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 12/7/23 - Administrative Staff II - Terri Rasbury TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 12/8/23 - Administrative Staff II - Terri Rasbury TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.50 Hour(s)	Item Date 12/11/23 - Administrative Staff II - Terri Rasbury TASK 3 - Data Management - Daily System Reports	\$23.27	\$11.64
0.25 Hour(s)	Item Date 12/12/23 - Administrative Staff II - Terri Rasbury TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 12/13/23 - Administrative Staff II - Terri Rasbury TASK 3 - Data Management - Daily System Reports	\$23.27	\$5.82
0.25 Hour(s)	Item Date 12/14/23 - Administrative Staff II - Terri Rasbury	\$23.27	\$5.82

**TERMS: DUE UPON PRESENTATION OF INVOICE**



# INVOICE

Invoice No.: TK56530  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

**TASK: Task 3**

**Direct Labor Costs**

TASK 3 - Data Management - Daily System Reports

0.25 Hour(s)	Item Date 12/15/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$5.82
	TASK 3 - Data Management - Daily System Reports		

Total Labor \$555.60

3 Times Hourly Rate

**Subtotal \$1,666.80**

**Direct Project Expenses**

\$1,634.87 Cost+	Item Date 12/1/23 - Miscellaneous - Special Use Drafts; Inv# 236115..ENERGY : UTILITIES	20%	\$1,961.84
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\$125.00 Cost+	Item Date 12/4/23 - Contract Labor MK Environmental Inc; Inv# 33564..SITE OPTIMIZATION SOFTWARE (SOS) SERVICE - DECEMBER 2023	20%	\$150.00
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90.00 Each	Item Date 12/7/23 - FID Meter	\$1.00	\$90.00
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202.00 Mile(s)	Item Date 12/7/23 - Mileage - Stan Rasburry JSR:travel to and from Little Rock PMI office and job site in Forrest City	\$0.700	\$141.40
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\$295.00 Cost+	Item Date 12/13/23 - Contract Lab Services Arkansas Analytical, Inc.; Inv# K23DEC199..BTEX, MTBE Arkansas Analytical, Inc.; Inv# K23DEC199..BTEX, MTBE	20%	\$354.00
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90.00 Each	Item Date 12/14/23 - FID Meter	\$1.00	\$90.00
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202.00 Mile(s)	Item Date 12/14/23 - Personal Mileage JSR:travel to and from Little Rock PMI office and job site in Forrest City	\$0.700	\$141.40
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**Subtotal \$2,928.64**

**Task Total \$4,595.44**

**TASK: Task 7**

**Direct Labor Costs**

2.00 Hour(s)	Item Date 12/5/23 - Senior Geologist - Stan Rasburry Update maps for CAM #26	\$42.24	\$84.48
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2.00 Hour(s)	Item Date 12/6/23 - Senior Geologist - Stan Rasburry Report preparation	\$42.24	\$84.48
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2.00 Hour(s)	Item Date 12/7/23 - Senior Geologist - Stan Rasburry Final report review	\$42.24	\$84.48
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2.00 Hour(s)	Item Date 12/11/23 - Senior Geologist - Stan Rasburry Final Review of CAM #26 Report	\$42.24	\$84.48
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TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Invoice No.: TK56530  
 Project No.: KT237126  
 Project: MRSI - Trust Fund - Forrest City  
 Shell  
 2335 North Washington  
 Forrest City, AR 72335

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

TASK: Task 7

Direct Labor Costs

√ 1.50 Hour(s)	Item Date 12/7/23 - Environmental Technician III - Danny Lloyd	\$28.30	\$42.45
	Task #7 Prepare Corrective Action Monitoring Report #26 Drawings, plot to PDF and Place in Project File		
√ 3.50 Hour(s)	Item Date 12/11/23 - Administrative Staff II - Terri Rasburry	\$23.27	\$81.45
	TASK 7 - CAM #26		

Total Labor \$461.82

3 Times Hourly Rate

Subtotal \$1,385.46

Task Total \$1,385.46

Forrest City Shell  
 ID #: 620000124  
 LUST: 62-0012  
 AFIN: 62-0007

<b>Invoice Total</b>	<b>\$5,980.90</b>
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# INVOICE

Little Rock, AR  
501-221-7122

Project Mgr: Richard Davis

**Project:** MRSI - Trust Fund - Forrest City Shell  
2335 North Washington  
Forrest City, AR 72335

**To:** Jayco Inc.  
Attn: Steve Reed  
PO Box 580  
Carlisle, AR 72024

REMIT TO:	
Invoice Number: TK47694	
Pollution Management, Inc. PO Box 959673 St. Louis, MO 63195-9673	
Federal E.I.N.: 71-0668874	

Project Number:	KT237126
Invoice Date:	12/19/2023
For Period:	12/03/2023 to 12/09/2023

Quantity	Description of Services	Rate	Total
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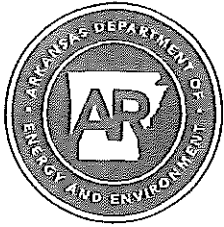
TASK: General

**Direct Project Expenses**

1.00	Item Date 12/19/23 - Application #8 Preparation Fee	\$1,000.00	\$1,000.00
		Subtotal	\$1,000.00
		Task Total	\$1,000.00

Forrest City Shell  
ID #: 620000124  
LUST: 62-0012  
AFIN: 62-0007

**Invoice Total \$1,000.00**



ARKANSAS  
ENERGY & ENVIRONMENT

MEMORANDUM

To: *Budget Green 4/3/24*  
Jacqueline Trotta, Trust Fund Administrator  
Assessment & Remediation Program, Office of Land Resources

Through: Blake Whittle, P.G., Groundwater Branch Manager *BW 4/3/24*  
Joshua Stevens, P.G., Geologist Supervisor, Regulated Storage Tanks *JS*  
A & R Program, OLR

From: David Frazier, Professional Geologist *DIF*  
RST, A & R Program, OLR

Date: March 22, 2024

Subject: Technical Review of Reimbursement Application #8  
For Time Period: 5/13/23 – 1/9/24  
Total Claim Amount: \$71,641.80  
[former] Forrest City Shell (JayCo. Inc.)  
2335 North Washington Ave.  
Forrest City, AR 72335  
ID #62000124      LUST #62-0012      AFIN: 62-00007

The following is in response to your memo to me dated 3/5/24.

1. Status of Release

- a) *At which step in the Subpart F process is the LUST case, i.e., Site Investigation, CAP, or FP Removal?*

This project is currently undergoing clean-up under two release reports: LUST#62-0059 and #62-0012. The first nineteen (19) interim reimbursements were processed under LUST #62-0059. An approved CAP expired in July, 2021. Because environmental goals were not attained, staff requested an Additional CAP on 4/21/22. On 10/27/22 an Additional CAP (Amendment #2) was approved. The remediation technology was modified to include air-sparge. On 6/12/23 an *Installation/Start-Up Report* was received. The air-sparge/soil-vapor extraction (AS/SVE) system went into full operation on 6/1/23.

On 2/21/13, RST staff prepared an Exposure Assessment (under LUST#62-0059) recommending a Corrective Action Plan in order to protect a beneficial-use aquifer.

A CAP was approved on 1/29/14. Public notification of the CAP was published on 1/31/14 without comment.

Clean-up has been conducted via soil-vapor extraction (SVE). The SVE system began operation on 10/9/14. The original CAP included two years of operation and maintenance. Two, one-year extensions of the CAP to continue operation & maintenance of the SVE system and to make periodic repairs were approved on 2/3/17 and 3/6/18. An additional two-year extension was approved on 6/6/19.

- b) *If the remedy has been selected, what are the clean-up goals? Identify any issues that may delay progress or resolution of the case.*

Goals for the clean-up are as follow:

- The “source control” goal will be verified by the reduction of soil vapor concentrations to not more than 290 ppmv in soil gas as measured with a PID meter.
- The clean-up goals for groundwater (beneficial-use aquifer) are EPA MCLs:

Constituents of Concern	Remediation Goal (µg/L)
Benzene	5
Toluene	1,000
Ethylbenzene	700
Xylenes (total)	10,000
Ethylene dibromide (EDB)	0.05
1,2-Dichloroethane	5
MTBE	*170

\* - Not a MCL.

At the conclusion of the first CAP in July, 2021, goal attainment had not been achieved in either the source control goal or the groundwater goal.

Under the first CAP, the SVE system concluded seven years of operation in July, 2021; however, operation was not continuous during this time period. The SVE system was down for a total of sixteen months due to needed repairs and while developing extended plans and cost approvals.

The Additional CAP (Amendment 2), approved on 10/27/22 entails the addition of an air-sparge (AS) system to enhance hydrocarbon recovery by a refurbished SVE system. The AS/SVE system is scheduled to be in operation for a period of two years with quarterly monitoring and reporting. The AS/SVE system came into full operation on 6/1/23.

In my opinion, the prolonged period of remediation at this project is due to the atypical distribution of contaminants in the sub-surface. Groundwater is quite deep: more than 110' below ground surface. Thus, leaked fuel penetrated many tens of feet vertically down through the vadose zone to a depth of about 70'. The heterogeneity of soil types yielded two distinct strata of contaminated soil. For this reason, extraction wells were installed to remediate each stratum.



Significant progress has been made and the addition of air sparge technology has proven to enhance hydrocarbon recovery; however, more time to remediate is necessary at this site than if contamination were at a shallow depth. Smaller pore spaces at depth inhibit the flow of soil vapor into the deep extraction wells. Ultimately, the effectiveness of corrective action will be demonstrated by a *prolonged* and measurable attenuation of MtBE (which has yet to be demonstrated). MtBE is the sole petroleum constituent that has been consistently detected in groundwater. The uppermost aquifer at the release site serves as the public supply of drinking water for Forrest City.

- c) *With the exception of investigation-derived wastes, if contaminated soil or ground water has been removed from the site, describe the quantity and type of contamination removed.*

Based upon hydrocarbon mass removal estimates, and as reported in the most recent monitoring report (*O&M/Monitoring Report #26*) received on 12/12/23, as of 11/29/23 a total of 20,572 vapor-equivalent gallons of hydrocarbons has been removed by the SVE system.

The remediation system does not produce significant quantities of groundwater; thus, only liquid IDW has been removed and recycled during sampling events.

## 2. Reimbursement Application

- a) *Briefly describe the activities for which reimbursement is requested and the specific work plan(s) or change order(s) (cost approvals) under which activities were authorized.*

The applicant is requesting reimbursement of costs incurred during the following activities:

- Operation and maintenance costs associated with an Additional CAP (Amendment #2) approved on 10/27/22 and in change order requests #1 and #2, approved on 3/9/23 and 5/16/23, respectively; and
- Preparation of RA#8.

- b) *Identify any activity that may conflict with Reg. 12 or that was not pre-approved by the technical staff.*

Neither unapproved activities nor conflicts with Rule 12 were noted.

- c) *If you do not agree with the consultant's project summary, state the areas of disagreement. If the consultant's summary is incomplete, or no summary is provided, give a brief history of the project to date.*

The applicant's Status Report, while confined to the application time period, reasonably reflects my understanding of the case. However, the report does not include updated information concerning the quantity of hydrocarbons removed, to date [see 1.c) herein].

LUST #62-0059 came to the department's attention on 12/30/2008 when gasoline contamination was found during a piping closure. Eventually, LUST #62-0012

(notification date 5/17/1996) was re-opened on 1/29/19 having been found to contribute to the commingled petroleum releases.

**3. Maps & Graphs**

- a) *If not provided by the consultant in the application, please attach site maps that identify the location of the site and the area of the release within the site.*

The applicant provided a site map from *O&M Report #26*, illustrating locations of remediation and monitoring wells.

- b) *Include any data and/or graphs that illustrate relevant environmental information in support of your summary.*

In their most recent report, PMI staff recommended early termination of remediation activities.

In response to this recommendation, RST staff did not concur. While the remediation goals for groundwater have recently been met for the first time (*O&M Report #26*), RST staff noted that 15% of compliance points have not met the goal for "source control". Furthermore, during the month of November, 2023, the remediation system recovered an average of 12 vapor-equivalent gallons of hydrocarbons per day. For these reasons, RST staff are concerned that the consequence of early termination of cleanup activities could be a "rebound" of dissolved contamination in the aquifer.



A Terracon Company

3512 S. Shackelford Road,  
Little Rock, AR 72205  
(501) 221-7122  
PMICO.com | Terracon.com

February 20, 2024

RECEIVED

MAR 04 2024

11:45 AM - RST

Arkansas Energy & Environment,  
Division of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

Attn: Jacqueline Trotta, Trust Fund Administrator

**Re:** Trust Fund Reimbursement Application #8  
Jordan's Kwik Stop #42 (Formerly Forrest City Shell)  
2335 North Washington Ave  
Forrest City, AR  
Facility ID: 62000124      LUST #: 62-0012      AFIN: 62-0007

Dear Ms. Trotta:

Enclosed please find the Eighth Interim Application for Reimbursement under the Arkansas Petroleum Storage Tank Trust Fund Act which is being submitted on behalf of JayCo, Inc.

Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,  
**Pollution Management, Inc., A Terracon Company**

Melissa K. Duncan  
CSR / Administrative Manager

**Enclosure:** Application #8

Cc: Steve Reed  
Job #: MRSI-5054 (KT237126)

**STATUS REPORT**

Jordan's Kwik Stop #42  
(Formerly Forrest City Shell)  
2335 North Washington Avenue  
Forrest City, Arkansas

Facility ID #62000124 LUST #62-0059 & #62-0012 AFIN 62-0007  
May 13, 2023 to January 9, 2024

Project Summary

In correspondence dated April 29, 2019, DEQ concurred that contamination from a previous release contributed to the current contaminant plume being remediated at the site. Therefore, the remediation goals expressed in the CAP for LUST #62-0059 were adopted into LUST #62-0012. A total of nineteen (19) reimbursement applications were presented for LUST #62-0059. Costs incurred for continued corrective action are presented for reimbursement under LUST #62-0012. This is the eighth (8<sup>th</sup>) reimbursement application request for LUST #62-0012.

The SVE system started full-time operation on October 9, 2014. The system was shut down on October 12, 2016, due to expiration of the approved two (2) year CAP. The SVE system continued to operate under two (2) one-year extensions, approved by DEQ via Change Orders. On April 29, 2019, ADEQ requested development of a CAP Amendment to continue corrective action. DEQ requested revisions to the plan and cost estimate, and a Revised CAP Amendment was submitted on May 17, 2019, and approved June 6, 2019. The RCAP Amendment provided cost to upgrade the SVE system and operate for an additional two (2) years. The up-graded system was re-started on July 24, 2019, and a SVE System Upgrade Installation/Start-up Report was submitted to ADEQ on August 6, 2019.

The system operated with quarterly groundwater monitoring/sampling, wellhead PID monitoring and CAM reporting until July 27, 2021, when the approved CAP Amendment expired, and the system was shut down. Through July 27, 2021, the SVE system recovered a calculated total of 102,069 pounds of hydrocarbons or **18,076 equivalent gallons of gasoline**. PMI submitted CAM Report #24 on August 6, 2021.

In written correspondence dated April 21, 2022, DEQ requested continued corrective action at the site for a period of two (2) years. PMI, JAYCO and RST staff met for a Scoping Meeting on May 3, 2022, to discuss and outline a Scope of Work. It was determined that the existing SVE system would be replaced with a combination SVE/Air-Sparge system and four (4) air-sparge wells would be installed, to aid in the reduction of MTBE. PMI submitted the CAP Amendment #2 on August 1, 2022. Revisions were requested and a Revised CAP Amendment #2 was approved on October 27, 2022.

The four (4) air-sparge wells were installed February 6, 7, and 8, 2023. The SVE/AS system was delivered and set on February 22, 2023. System trenching and piping was completed, power was reconnected and PMI and MK Environmental conducted system start-up and testing on April 27, 2023. There was an issue with the power input and building high-temperature and AWS tank high-level alarms, which delayed continuous operation. The issues were resolved, and the system started full-time operation on June 1, 2023.

CAM report #25 was submitted on October 3, 2023, and CAM report #26 was submitted on December 11, 2023. PMI recommended case closure in CAM report #26, based on the significant reduction in MTBE concentrations during the two (2) quarters of operation. DEQ did not concur with PMI's recommendation, and requested continued operation of the system, based on current hydrocarbon recovery rates. The next quarterly monitoring/sampling event is scheduled for February 2024.

Summary of Billing and PMI Invoices:

Revised CAP Amendment #2 Approved Amount:	\$643,771.46
Change Order #1: & Change Order #2	\$42,967.62
<b>Total Amount Approved:</b>	<b>\$686,729.24</b>
Previously Reimbursed:	\$357,838.26
Amount Included in this Application:	<b>\$71,641.80</b>

Current Reimbursable Activities

Invoice# 50304 5/31/2023

- Task 3 – Weekly AS/SVE system O&M
- Task 7 – Data Management and Report Preparation

Invoice# 50369 6/21/2023

- Task 3 – Weekly AS/SVE system O&M
- Task 7 – Data Management and Report Preparation

Invoice #50423 6/30/2023

- Task 3 – Weekly AS/SVE system O&M

Invoice #50559 7/20/2023

- Task 3 – Weekly AS/SVE system O&M

Invoice# TK23268 11/02/2023

- Task 3 – Weekly AS/SVE system O&M
- Task 7 – Data Management and Report Preparation

Invoice# TK40795 12/04/2023

- Task 3 – Weekly AS/SVE system O&M
- Task 7 – Data Management and Report Preparation

Invoice# TK47659 12/19/2023

- Task 3 – Weekly AS/SVE system O&M
- Task 4 – Equipment Rental for Groundwater Sampling
- Task 6 – Liquid Waste Disposal
- Task 7 – Data Management and Report Preparation

Invoice# TK56530 1/02/2024

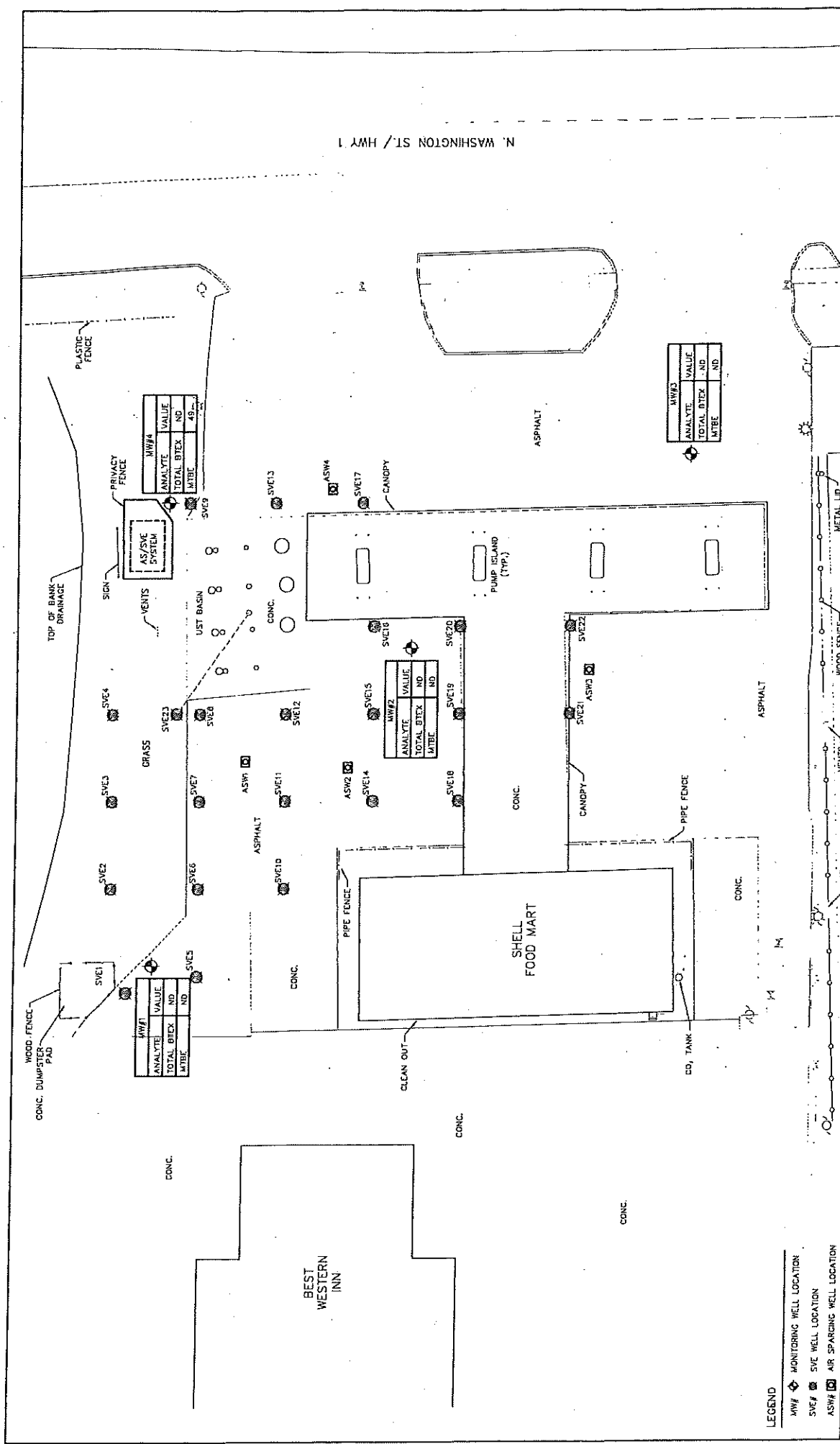
- Task 3 – Weekly AS/SVE system O&M
- Task 5 – Sample Analysis
- Task 7 – Data Management and Report Preparation

Invoice #TK06055A 1/09/2024

- Task 3 – Weekly AS/SVE system O&M
- Task 4 – Quarterly PID Wellhead Monitoring and Groundwater Sampling
- Task 5 – Sample Analysis
- Task 6 – Liquid Waste Disposal
- Task 7 – Data Management and Report Preparation

Invoice #TK47694 1/09/2023

- Reimbursement Application #8 Fee



<b>CIVIL ENGINEERING AND ENVIRONMENTAL SERVICES</b> 3312 South Sheklford Road Little Rock, Arkansas 72205 (501) 221-7122 fax (501) 221-7776	SUBMITTED: S. RASBERRY DRAWN: D. LLOYD CHECKED: S. RASBERRY DATE: NOVEMBER 7, 2023	CORRECTIVE ACTION MONITORING REPORT #26 JORDAN'S KWIK STOP #42 (FORMERLY FORREST CITY SHELL) 2095 NORTH WASHINGTON ST. FORREST CITY, ARKANSAS	JOB NUMBER MS-2024-0054 REVISIONS REVISIONS DRAWING NO. 3
	<b>PMI</b>		



# ARKANSAS

## ENERGY & ENVIRONMENT

### MEMORANDUM OF REVIEW Reimbursement Request Petroleum Storage Tank Trust Fund

From: Petroleum Storage Tank Trust Fund Staff

Date: May 29, 2024

Subject: **Doublebee's #104**  
**409 Wilbur Mills Avenue**  
**Kensett, Arkansas**  
**ID #73000162 LUST #73-0076 AFIN 73-00581**

A request for reimbursement (#4) for costs incurred during remediation of an Underground Storage Tank (UST) site was received from the Responsible Party (RP) on March 22, 2024. The RP of this site reported a product release (#73-0076) on March 28, 2019, after receiving notification of free product in an underground storage tank basin observation well. The name and the address of the RP:

**B-H-T Investments Co., Inc.**  
**Attn: Steve Lightle**  
**P.O. Box 1469**  
**Searcy, AR 72145**

The period covered by this application is March 11, 2023 through December 11, 2023. Remediation activities for which reimbursement is requested include: preparation of the Free Product Removal Work Plan and Cost Estimate, and preparation of Reimbursement Application #4.

To date, a 12-hour Mobile Dual Phase Extraction event was conducted which resulted in the recovery of 1,930 gallons of waste liquids and 2.67 vapor-equivalent gallons of gasoline. This is in addition to the initial 156 gallons of waste liquid recovered.

This application includes five (5) invoices from Pollution Management Inc., A Terracon Company (PMI) totaling **\$13,073.15**. Included in PMI's invoices are charges for PMI direct labor charges.

The consultant and the RST Case Manager have each prepared a summary of activities. (See attachments).

**RECOMMENDATION:**

The claimed cost of **\$13,073.15** was checked against documentation provided. Copies of the Cost Summary Sheet and all recap sheets provided by the RP are attached.

**The staff recommends payment as follows:**

<b>Claim filed- Form TF-1</b>	<b>\$ 13,073.15</b>
<b>Less: Deductible</b>	<b>- 00.00</b>
<b>Less: Adjustments</b>	<b>- <u>00.00</u></b>
<b>Total Net Claim</b>	<b><u>\$ 13,073.15</u></b>

It is recommended that the claim made by the RP be considered in the amount of **\$13,073.15**.



# Approved Work Plans

73000162 73-0076 DOUBLEBEES #104

	<u>Date</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	05/19/2020	Approval of SAWP & Cost Estimate	PMI	\$56,494.76
02	09/03/2020	Approval of CO #1 to SAWP Request	PMI	\$1,716.66
03	09/16/2021	Approval od Additional SA-IFPRWP & C.E.	PMI	\$85,291.70
04	02/16/2022	Approval of Co#2-AdditionalSA-IFPRWP	PMI	\$1,080.00
05	01/07/2022	Approval of C.O. #1-2nd Additional Site Assessment/Interim Free PRWP	PMI	\$8,718.00
				<hr/> <hr/> <u>\$153,301.12</u>

# Approved Payments

73000162

730076

DOUBLEBEES #104

<u>Date Approved</u>	<u>Amount</u>
7 /29/2020	\$4,887.74
9 /29/2021	\$44,139.34
5 /25/2022	\$59,497.89
	<hr/>
	<b>\$108,524.97</b>
	<hr/> <hr/>

**APPLICATION FOR REIMBURSEMENT**  
from the  
**PETROLEUM STORAGE TANK TRUST FUND**

(1) ADEQ Facility Identification Number: 73000162

(2) Responsible Party Information:

Company Name B-H-T Investment Co., Inc.

Contact Person Steve Lightle

Address P.O. Box 1469

City and State Searcy, AR

Zip Code 72145-1469

Phone (501) 268-6107

(3) Release Location

Facility Name Doublebees #104

Address 409 Wilbur Mills Avenue

City and State Kensett, Arkansas

(4) Type of Tank (check only one):

Aboveground

Underground

(5) Type of Product Released:

Gasoline  Kerosene  Jet Fuel  Diesel  Heating Oil

Aviation Gas  Used Motor Oil  Other  (list) \_\_\_\_\_

Date of Release 3/28/2019 Release (LUST) Number 73-0076

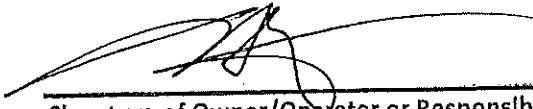
**CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I also certify that the amounts claimed for reimbursement under this application have been paid in full. I further certify that I have the authority to submit this application on behalf of

B-H-T Investment Company, Inc.

Steve Lightle

Type/Print name of Owner/Operator or Responsible Party



Signature of Owner/Operator or Responsible Party

**ACKNOWLEDGEMENT**

Sworn to and subscribed before me this 12 day of March, 2024.

Sandra Lee Marlin  
Notary Public

My Commission Expires: 8-10-2031

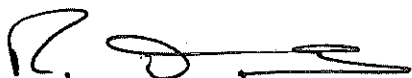


### PROOF OF PAYMENT AFFIDAVIT

I, Richard T. Davis being of sound mind, am responsible to ensure this application is completed per regulatory requirements. I have personal knowledge of the contents of this document; all of which are true and correct to the best of my knowledge. Furthermore, as Principal of Pollution Management, Inc., I certify that, as of this date, Pollution Management, Inc. has been paid in full by B-H-T Investment Company for the invoices contained in this reimbursement request:

Invoice Number	Invoice Date	Invoice Amount
50370	6/21/2023	\$1,656.92
50518	6/30/2023	\$3,131.18
50497	7/26/2023	\$519.76
TK06050	9/30/2023	\$7,265.29
TK44718	12/11/2023	\$500.00
<b>Total</b>		<b>\$13,073.15</b>

Signed this 12 day of March, 2024



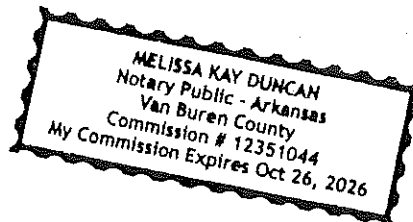
Richard T. Davis, Principal

#### ACKNOWLEDGEMENT

Sworn to and subscribed before me this 12<sup>th</sup> day of March, 2024.

Melissa Kay Duncan  
Notary Public

My Commission Expires: 10-26-2026



Interim Request No.	4	<b>COST SUMMARY SHEET</b>			
Consultant /Responsible Party:		BHT Investments Company, Inc			
Facility Identification #:		73000162	Facility Name: Doublebees #104		
Dates current costs incurred:		From	03/11/22	to	12/11/23
		Request Date:		12/11/23	
<b>COST SUMMARY</b>					
1. DIRECT LABOR COST (attach labor recap)		Hours	Actual Cost		
Principal/Managerial		0.00	\$0.00		
Professional/Technical		97.50	\$3,935.23		
Support		9.75	\$226.88		
Totals		107.25	\$4,162.12		
Total Actual Labor Costs x 3					\$12,486.35
2. FIXED RATE COSTS (List by category - attach recap)		Actual Cost			
Equipment Rental		\$0.00			
Per Diem (meals only, with documented overnight stay)		\$0.00			
Mileage		\$86.80			
Other		\$0.00			
Total Fixed Rate Costs				\$86.80	
3. OTHER DIRECT COSTS (List by category - attach recap)		Actual Cost			
Lodging		\$0.00			
Laboratory		\$0.00			
Subcontracts		\$0.00			
Supplies		\$0.00			
Other		\$0.00			
Total Other Direct Costs				\$0.00	
4. Reimbursement Preparation Cost for RA#(s) <u>4</u>		(\$500 or \$1000)		\$500.00	
5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)				\$13,073.15	
6. Markup on Total Other Direct Costs (maximum 20%)				\$0.00	
7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)				\$13,073.15	
A. Total Reimbursement Requested to Date Including Above:				\$134,947.32	
B. Less Amount Deductible (\$25,000, \$15,000, or \$7,500)				\$7,500.00	
C. Less Amount Previously Retained/Disallowed by RST:				\$5,849.20	
D. Less Amount Previously Received (Reimbursed by ADEQ):				\$108,524.97	
E. Amount of this Request (same as line 7 above unless it is the 1st Request):				\$13,073.15	





























# Pollution Management, Inc.

3512 S. Shackelford Rd  
 Little Rock, AR 72205-  
 Tel: 501-221-7122 Fax: 501-221-7775  
 www.pmico.com

B H T Investment Co.  
 PO Box 1469  
 3123 E. Race Ave.  
 Searcy, AR 72145

**Invoice Number:** 50370  
**Date:** 6/21/23  
**Billing Manager:** Richard Davis  
**Client ID:** BHTI

Steve Lightle

**Contract:** BHTI-11457:  
 TF - Doublebees #104 - Kensett, AR

TF - IRR/ISC  
 Doublebees #104  
 409 Wilbur Mills Avenue  
 Kensett, AR 72082  
 Facility ID: 73000162  
 LUST: 73-0076

**Labor**

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>	
<b>J. S. Rasburry</b>					
T1 - WP PREP: PM	Work Plan Development	6/14/23	2.00	\$114.27	\$228.54
T1 - WP PREP: PG	work plan development	6/15/23	4.00	\$114.27	\$457.08
T1 - WP PREP: PG	Work Plan development	6/16/23	2.50	\$114.27	\$285.68
T1 - WP PREP: PG	Work Plan preparation	6/19/23	2.00	\$114.27	\$228.54
T1 - WP PREP: PG	prepare data for FPRWP	6/20/23	2.00	\$114.27	\$228.54
T1 - WP PREP: PM	Prepare and attend Scoping meeting for work plan development	6/20/23	2.00	\$114.27	\$228.54
		Employee Subtotal	14.50		1,656.92
		Labor Subtotal	14.50		1,656.92
			<b>Labor Total:</b>		<b>1,656.92</b>
					0.00

**Amount Due This Invoice**

**\$1,656.92**

*This invoice is due upon receipt*

# Pollution Management, Inc.

3512 S. Shackelford Rd  
 Little Rock, AR 72205-  
 Tel: 501-221-7122 Fax: 501-221-7775  
 www.pmico.com

B H T Investment Co.  
 PO Box 1469  
 3123 E. Race Ave.  
 Searcy, AR 72145

**Invoice Number:** 50518  
**Date:** 6/30/23  
**Billing Manager:** Richard Davis  
**Client ID:** BHTI

Steve Lightle

**Contract:** BHTI-11457:  
 TF - Doublebees #104 - Kensett, AR

TF - IRR/ISC  
 Doublebees #104  
 409 Wilbur Mills Avenue  
 Kensett, AR 72082  
 Facility ID: 73000162  
 LUST: 73-0076

**Labor**

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>	
<b>D. D. Lloyd</b> Drafting	Task #1 Prepare Free Product Removal Work Plan Drawings, Plot to PDF and Place in Project File	6/27/23	3.00	\$80.70	\$242.10
Employee Subtotal		3.00		242.10	
<b>J. S. Rasbury</b>					
T1 - WP PREP: PG	prepare data for FPRWP	6/21/23	4.00	\$114.27	\$457.08
T1 - WP PREP: PG	Work Plan preparation	6/26/23	2.00	\$114.27	\$228.54
T1 - WP PREP: PG	Work Plan Development	6/27/23	2.00	\$114.27	\$228.54
T1 - WP PREP: PG	Work Plan Development	6/29/23	2.50	\$114.27	\$285.68
Employee Subtotal		10.50		1,199.84	
<b>Tony R. Scott</b>					
Construction Supervision	Work Plan Prep Task 1	6/28/23	6.00	\$129.94	\$779.65
Construction Supervision	Work Plan Prep Task 1	6/29/23	6.00	\$129.94	\$779.65
Construction Supervision	Work Plan Prep Task 1	6/30/23	1.00	\$129.94	\$129.94
Employee Subtotal		13.00		1,689.24	
Labor Subtotal		26.50		3,131.18	
<b>Labor Total:</b>				<b>3,131.18</b>	
				0.00	

**Amount Due This Invoice**

**\$3,131.18**

*This invoice is due upon receipt*

# Pollution Management, Inc.

3512 S. Shackleford Rd  
Little Rock, AR 72205-  
Tel: 501-221-7122 Fax: 501-221-7775  
www.pmico.com

BHT Investment Co.  
PO Box 1469  
3123 E. Race Ave.  
Searcy, AR 72145

**Invoice Number:** 50497  
**Date:** 7/26/23  
**Billing Manager:** Richard Davis  
**Client ID:** BHTI

Steve Lightle

**Contract:** BHTI-11457:  
TF - Doublebees #104 - Kensett, AR

---

TF - IRR/ISC  
Doublebees #104  
409 Wilbur Mills Avenue  
Kensett, AR 72082  
Facility ID: 73000162  
LUST: 73-0076

## Labor

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>	
Tony R. Scott					
Construction Supervision	Work Plan Prep Task 1	7/3/23	2.00	\$129.94	\$259.88
Construction Supervision	Work Plan PrepTask 1	7/13/23	2.00	\$129.94	\$259.88
	Employee Subtotal		4.00		519.76
	Labor Subtotal		4.00		519.76
			<b>Labor Total:</b>		<b>519.76</b>
					0.00

**Amount Due This Invoice**

**\$519.76**

*This invoice is due upon receipt*



# INVOICE

Little Rock, AR  
501-221-7122

Project Mgr: Richard Davis

**Project:** BHTI - Trust Fund - IRR-ISC - Doublebees #104  
409 Wilbur Mills Avenue  
Kensett, AR

**To:** B-H-T Investment Company Inc  
Attn: Steve Lightle  
3123 E Race Avenue  
Searcy, AR 72145

REMIT TO:	
Invoice Number: TK06050	
Pollution Management, Inc. PO Box 959673 St. Louis, MO 63195-9673	
Federal E.I.N.: 71-0668874	

Project Number:	KT237029
Invoice Date:	9/30/2023
For Period:	7/09/2023 to 9/23/2023

Quantity	Description of Services	Rate	Total
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TASK: Task 1

**Direct Labor Costs**

5.00 Hour(s)	Item Date 7/24/23 - Senior Geologist - Stan Rasburry Prepare data for Free Product Removal Work Plan and Cost Estimate	\$42.24	\$211.20
4.00 Hour(s)	Item Date 7/25/23 - Senior Geologist - Stan Rasburry work plan and cost estimate preparation	\$42.24	\$168.96
2.00 Hour(s)	Item Date 7/28/23 - Senior Geologist - Stan Rasburry work plan development	\$42.24	\$84.48
2.00 Hour(s)	Item Date 8/2/23 - Senior Geologist - Stan Rasburry work plan preparation	\$42.24	\$84.48
2.00 Hour(s)	Item Date 8/7/23 - Senior Geologist - Stan Rasburry Work Plan preparation	\$42.24	\$84.48
3.00 Hour(s)	Item Date 8/22/23 - Senior Geologist - Stan Rasburry prepare Free Product Removal Work Plan	\$42.24	\$126.72
4.00 Hour(s)	Item Date 8/23/23 - Senior Geologist - Stan Rasburry prepare FPR work plan and cost estimate	\$42.24	\$168.96
5.00 Hour(s)	Item Date 8/24/23 - Senior Geologist - Stan Rasburry prepare FPR work plan and cost estimate	\$42.24	\$211.20
2.00 Hour(s)	Item Date 8/25/23 - Senior Geologist - Stan Rasburry prepare cost estimate and cost table for FPR Work Plan	\$42.24	\$84.48
3.00 Hour(s)	Item Date 8/28/23 - Senior Geologist - Stan Rasburry prepare cost estimate and bid summary for FPR Work Plan	\$42.24	\$126.72
3.00 Hour(s)	Item Date 8/31/23 - Senior Geologist - Stan Rasburry work plan preparation	\$42.24	\$126.72
4.00 Hour(s)	Item Date 9/5/23 - Senior Geologist - Stan Rasburry work plan and cost estimate preparation	\$42.24	\$168.96
2.00 Hour(s)	Item Date 9/7/23 - Senior Geologist - Stan Rasburry	\$42.24	\$84.48

**TERMS: DUE UPON PRESENTATION OF INVOICE**



# INVOICE

Invoice No.: TK06050  
 Project No.: KT237029  
 Project: BHTI - Trust Fund - IRR-ISC -  
 Doublebees #104  
 409 Wilbur Mills Avenue  
 Kensett, AR

Project Mgr: Richard Davis

Quantity	Description of Services	Rate	Total
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Continued

TASK: Task 1

**Direct Labor Costs**

work plan and bid summary preparation

2.50 Hour(s) Item Date 9/11/23 - Senior Geologist - Stan Rasburry \$42.24 \$105.60  
 Finalize FPR Work Plan

1.00 Hour(s) Item Date 9/12/23 - Senior Geologist - Stan Rasburry \$42.24 \$42.24  
 Finalize cost estimate and bid summary for FPR Work Plan

1.00 Hour(s) Item Date 9/13/23 - Senior Geologist - Stan Rasburry \$42.24 \$42.24  
 review work plan revisions

45.50

7.00 Hour(s) Item Date 7/25/23 - Project Geologist - Kiefer Vaughn \$34.86 \$244.02  
 Task 1 - Site Recon / Well Gauging

7

7.50 Hour(s) Item Date 9/13/23 - Administrative Staff II - Terri Rasburry \$23.27 \$174.53  
 TASK 1 - Free Product Removal Work Plan

1.00 Hour(s) Item Date 9/14/23 - Administrative Staff II - Terri Rasburry \$23.27 \$23.27  
 TASK 1 - Free Product Removal Work Plan

1.00 Hour(s) Item Date 9/15/23 - Administrative Staff II - Terri Rasburry \$23.27 \$23.27  
 TASK 1 - Free Product Removal Work Plan

0.25 Hour(s) Item Date 9/18/23 - Administrative Staff II - Terri Rasburry \$23.27 \$5.82  
 DEQ Receipt of Work Plan

9.75

62.25

62.25 Hour(s) Total Labor \$2,392.83

3 Times Hourly Rate

Subtotal \$7,178.49

**Direct Project Expenses**

124.00 Mile(s) Item Date 7/25/23 - Personal Mileage \$0.700 \$86.80  
 Kiefer Vaughn - Travel to site to conduct groundwater gauging and travel back to office.

Subtotal \$86.80

Task Total \$7,265.29

Doublebee's #104  
 ID: 73000162  
 LUST: 73-0076  
 AFIN: 73-00581

**Invoice Total \$7,265.29**

TERMS: DUE UPON PRESENTATION OF INVOICE



# INVOICE

Little Rock, AR  
501-221-7122

Project Mgr: Richard Davis

**Project:** BHTI - Trust Fund - IRR-ISC - Doublebees #104  
409 Wilbur Mills Avenue  
Kensett, AR

**To:** B-H-T Investment Company Inc  
Attn: Steve Lightle  
3123 E Race Avenue  
Searcy, AR 72145

<b>REMIT TO:</b>
<b>Invoice Number: TK44718</b>
<b>Pollution Management, Inc.</b>
<b>PO Box 959673</b>
<b>St. Louis, MO 63195-9673</b>
<b>Federal E.I.N.: 71-0668874</b>

<b>Project Number:</b>	KT237029
<b>Invoice Date:</b>	12/11/2023
<b>For Period:</b>	9/24/2023 to 12/02/2023

Quantity	Description of Services	Rate	Total
<b>Direct Project Expenses</b>			
1.00 Each	Item Date 12/11/23 - Application #4 Preparation Fee	\$500.00	\$500.00
		<b>Subtotal</b>	<b>\$500.00</b>

Doublebee's #104  
ID: 73000162  
LUST: 73-0076  
AFIN: 73-00581

**Invoice Total** **\$500.00**

**TERMS: DUE UPON PRESENTATION OF INVOICE**





# ARKANSAS ENERGY & ENVIRONMENT

## MEMORANDUM

*Bridget Green 4/11/24*  
**To:** Jacqueline Trotta, Trust Fund Administrator  
Assessment & Remediation Program, Office of Land Resources

**Through:** Blake Whittle, P.G., Groundwater Branch Manager *BW 4/12/24*  
Joshua Stevens, P.G., Geologist Supervisor, Regulated Storage Tanks *JS*  
A & R Program, OLR

**From:** Mikel R. Shinn, P.G. *M.R.S.*  
RST, A & R Program, OLR

**Date:** April 4, 2024

**Subject:** Technical Review of Reimbursement Application #4  
For Time Period: March 11 - December 11, 2023  
Amount Requested: \$13,073.15  
Doublebee's #104 ["BHT Investments, Inc."]  
409 Wilbur Mills Avenue  
Kensett, Arkansas 72082  
ID #73000162 LUST #73-0076 AFIN 73-00581

The following is in response to your memo to me dated March 26, 2024.

### 1. Status of Release

- a) *At which step in the Subpart F process is the LUST case, i.e., Site Investigation, CAP, or FP Removal? – Free Product Removal. A Free Product Removal Work Plan and Cost Estimate was submitted by Pollution Management, Inc. on 9/15/23. Final review of the plan by OLR RST has been suspended, pending a decision by the Responsible Party regarding site redevelopment.*
- b) *If the remedy has been selected, what are the clean-up goals? Identify any issues that may delay progress or resolution of the case. – Free product removal to the maximum extent practicable.*
- c) *With the exception of investigation-derived wastes, if contaminated soil or ground water has been removed from the site, describe the quantity and type of contamination removed. – Approximately six gallons of free product gasoline were recovered from tankhold observation wells during initial response activities in 2019. A total of 150 gallons of liquid wastes were recovered from the UST tankhold and a nearby monitoring well (MW-4) during a de-watering event conducted on 1/19/22. On the next day (1/20/22), a 12-hour Mobile Dual Phase Extraction event was conducted which resulted*

in the recovery of 1,930 gallons of waste liquids and 2.67 vapor-equivalent gallons of gasoline.

## 2. Reimbursement Application

- a) *Briefly describe the activities for which reimbursement is requested and the specific work plan(s) or change order(s) (cost approvals) under which activities were authorized.* – BHT Investments, Inc. is requesting reimbursement for:
- Preparation of the *Free Product Removal Work Plan and Cost Estimate* submitted on 9/15/23.
  - Preparation of the current Trust Fund Reimbursement Application #4 (\$500.00).
- b) *Identify any activity that may conflict with Reg. 12 or that was not pre-approved by the technical staff.* – No activities in conflict with Reg. 12 were identified.
- c) *If you do not agree with the consultant's project summary, state the areas of disagreement. If the consultant's summary is incomplete, or no summary is provided, give a brief history of the project to date.* – Pollution Management, Inc. has provided an adequate project summary.

## 3. Maps & Graphs

- a) *If not provided by the consultant in the application, please attach site maps that identify the location of the site and the area of the release within the site.* – Adequate site maps are included in PMI's project summary.
- b) *Include any data and/or graphs that illustrate relevant environmental information in support of your summary.* - No additional data and/or graphs have been generated.



A Terracon Company

3512 S. Shackelford Road,  
Little Rock, AR 72205  
(501) 221-7122  
PMICO.com | Terracon.com

March 20, 2024

RECEIVED

MAR 22 2024

DEQ - RST

Arkansas Energy & Environment,  
Division of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

Attn: Jacqueline Trotta, Trust Fund Administrator

**Re:** Trust Fund Reimbursement Application #4

Doublebees #104  
409 Wilbur Mills Ave.  
Kensett, AR

Facility ID: 73000162

LUST #: 73-0076

AFIN: 73-00581

Dear Ms. Trotta:

Enclosed please find the Fourth Interim Application for Reimbursement under the Arkansas Petroleum Storage Tank Trust Fund Act which is being submitted on behalf of BHT Investments.

Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

**Pollution Management, Inc., A Terracon Company**

Melissa K. Duncan  
CSR / Administrative Manager

**Enclosure:** Application #4

cc: Steve Lightle  
Job #: BHTI-11457 (KT237029)

Explore with us

## STATUS REPORT

BHT Investments, Inc.  
Doublebee's #104  
409 Wilbur Mills Avenue  
Kensett, Arkansas 72082  
Facility ID #73000162 LUST #73-0076 AFIN: 73-00581  
Period of March 11, 2023 through December 11, 2023

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The following is a summary of reimbursable activities completed on behalf of BHT Investment Company, Searcy, Arkansas. The subject property is the Doublebee's #104, located at 409 Wilbur Mills Avenue, Kensett, (White County), Arkansas. This is the fourth (4<sup>th</sup>) trust fund reimbursement application request for LUST #73-0076.

### Project Background

On March 28, 2019, Jim Cheevers of Arkansas Testing Services Inc. (ATSI) reported a suspected release to the Arkansas Energy & Environment, Division of Environmental Quality (DEQ) on behalf of BHT for the Doublebee's #104 facility in Kensett, Arkansas. The report was made following the discovery of free product (FP) in an underground storage tank (UST) basin observation well. PMI sent a written follow-up to the release report to the DEQ on March 29, 2019. ATSI performed a UST system tightness test in response to the presence of free product. In addition to testing the tanks and lines, the cathodic protection system was also tested. All components of the UST system passed. An estimated total of six (6) gallons of product was removed from the well. A copy of the system tests was included in the Initial Response Report (IRR), submitted by PMI on April 3, 2019.

On April 22, 2019, PMI performed an Initial Site Characterization. PMI submitted the ISC Report on May 9, 2019. On February 20, 2020, the RST technical case manager requested a Site Assessment Work Plan. PMI submitted the work plan on March 24, 2020. The work plan was approved, and PMI commenced field activities on July 7, 2020. The assessment was completed, and a Site Assessment Report was submitted on September 16, 2020. Results of the assessment indicated the presence of soil and groundwater contamination across the site. Free product (gasoline) was present in tank basin observation well OW-1 (0.51') and monitoring well MW-4 (1.06').

In correspondence dated April 13, 2021, DEQ requested an Additional Site Assessment and Interim Free Product Removal Work Plan and Cost Estimate. PMI submitted the work plan on June 4, 2021. DEQ requested revisions and a 2<sup>nd</sup> Revised ASA/IFRP work plan was submitted. The work plan was approved on September 16, 2021. The work plan was implemented, and an Additional Site Assessment/Interim Free Product Removal Report was submitted on February 22, 2022.

Results of the additional assessment further delineated soil and groundwater contamination across the site. Free product removal via a 1-day de-watering event and a single 12-hour MDPE event was ineffective, recovering only 2.67 equivalent gallons - vapor and 2,080 gallons of waste liquid. An additional 107 gallons of waste liquid was generated during groundwater sampling and 3.62 tons of soil was disposed of from well installations. PMI submitted an Additional Site Assessment and Interim Free Product Removal Report on February 10, 2023.

In correspondence dated May 22, 2023, DEQ requested a Free Product Removal Work Plan and Cost Estimate. The work plan was submitted on September 15, 2023, and is currently under review by DEQ-RST staff.

### Summary of Work Plan Billing and PMI Invoices:

Work Plan Proposed Amount:	\$541,803.72
Previously Reimbursed for Work Plan:	\$0.00
Amount Included in this Application:	\$13,073.15

### Current Reimbursable Activities

#### PMI Invoice #50370

- Task 1 - Free Product Removal Work Plan preparation

PMI Invoice #50518

- Task 1 – Free Product Removal Work Plan preparation

PMI Invoice#50497

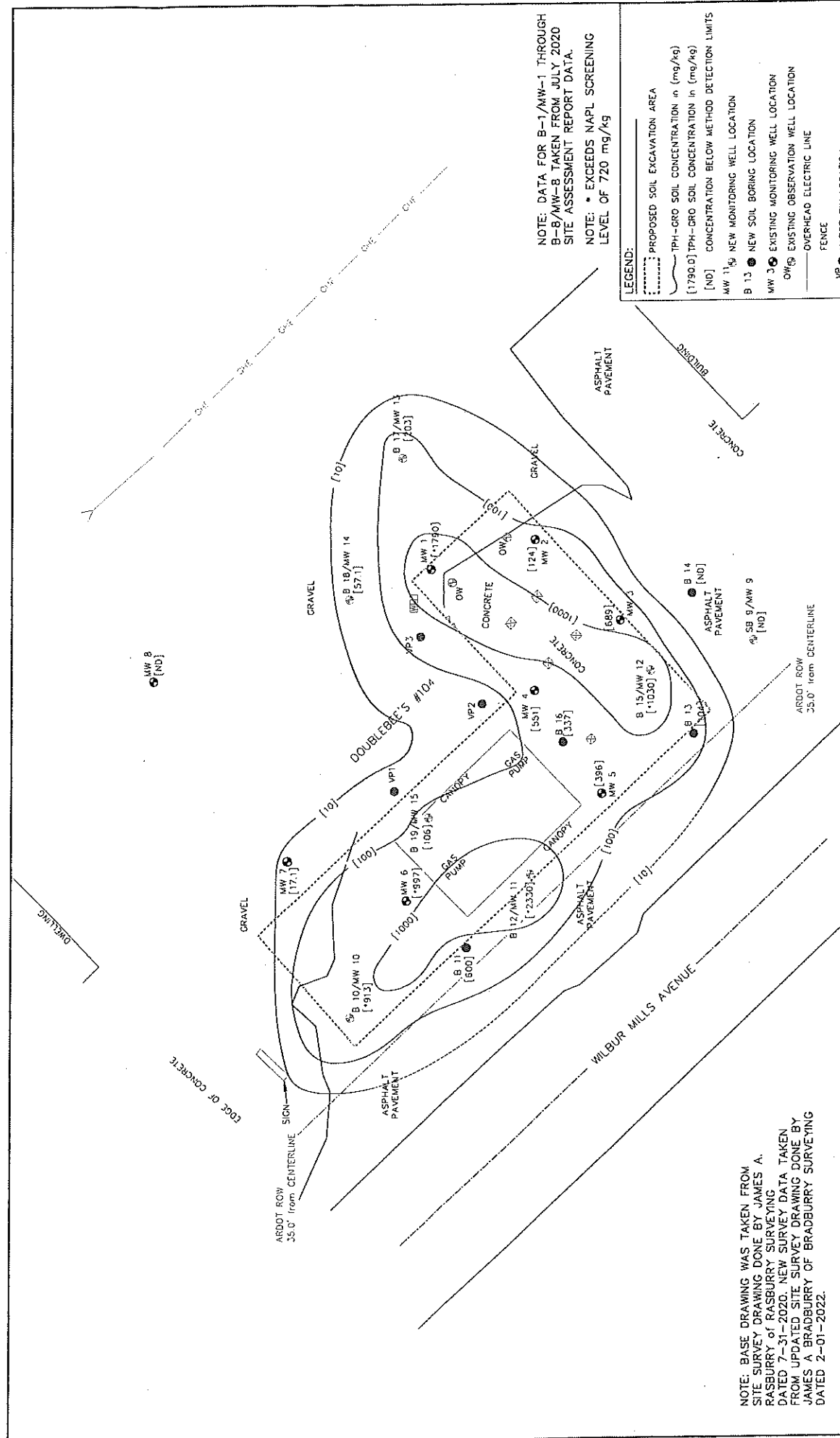
- Task 1 – Free Product Removal Work Plan preparation

PMI-Terracon Invoice #TK06050

- Task 1 – Free Product Removal Work Plan preparation

PMI-Terracon Invoice #TK44718

- Reimbursement Application #4 Preparation Fee



NOTE: DATA FOR B-1/MW-1 THROUGH B-8/MW-8 TAKEN FROM JULY 2020 SITE ASSESSMENT REPORT DATA.  
 NOTE: \* EXCEEDS NAPL SCREENING LEVEL OF 720 mg/kg

**LEGEND:**

- PROPOSED SOIL EXCAVATION AREA
- (1790.0) TPH-GRO SOIL CONCENTRATION in (mg/kg)
- [ND] TPH-GRO SOIL CONCENTRATION in (mg/kg)
- [ND] CONCENTRATION BELOW METHOD DETECTION LIMITS
- MW 11 NEW MONITORING WELL LOCATION
- B 12 NEW SOIL BORING LOCATION
- MW 3 EXISTING MONITORING WELL LOCATION
- OW5 EXISTING OBSERVATION WELL LOCATION
- OVERHEAD ELECTRIC LINE
- FENCE
- VP VAPOR PIN LOCATION

NOTE: BASE DRAWING WAS TAKEN FROM SITE SURVEY DRAWING DONE BY JAMES A. RASBERRY OF RASBERRY SURVEYING DATED 7-31-2020. NEW SURVEY DATA TAKEN FROM UPDATED SITE SURVEY DRAWING DONE BY JAMES A. BRADBERRY OF BRADBERRY SURVEYING DATED 2-01-2022.

<b>CIVIL ENGINEERING AND ENVIRONMENTAL SERVICES</b> 3512 South Shackleford Road Little Rock, Arkansas 72205 (501) 221-7122 fax (501) 221-7775	SUBMITTED: S. RASBERRY DRAWN: D. LLOYD CHECKED: S. RASBERRY DATE: JUNE 27, 2023	FREE PRODUCT REMOVAL WORK PLAN 400 WILBUR MILLS AVENUE KANSAS CITY, MISSOURI 64111 FACILITY ID#73000108 LIST# 773-0078 AFN# 773-00001 FILE # VPHI INVESTMENT COMPANY# 11437 - 11437 - 11437 - 11437 - 11437 - 11437 - 11437 - 11437	JOB NUMBER BHTI-11457 DRAWING NO. 2
	TPB-GRO SOIL ISOCONCENTRATION MAP with PROPOSED EXCAVATION AREA		





# ARKANSAS

## ENERGY & ENVIRONMENT

**MEMORANDUM OF REVIEW**  
**Reimbursement Request**  
**Petroleum Storage Tank Trust Fund**

From: Petroleum Storage Tank Trust Fund Staff

Date: May 29, 2024

Subject: **Exxon Circle N South [JRM4 LLC]**  
**1414 N Main**  
**Brinkley, AR 72432**  
**ID #48000019 LUST #48-0022 AFIN 48-00015**

A request for reimbursement (#1) for costs incurred during remediation of an Underground Storage Tank (UST) site was received from the Responsible Party (RP) on March 11, 2024. The RP of this site reported a release (#48-0022) on April 30, 2023, after receiving notification of fuel running across the ground near the pumps after a vehicle struck the dispenser. The name and the address of the RP:

**JRM4**  
**Attn: Jackie McClure**  
**P.O. BOX 47**  
**Harrisburg, AR 72432**

The period covered by this application is May 1, 2023 through January 24, 2024. Remediation activities for which reimbursement is requested include: initial release response prior to referral of the LUST case to the A&R workgroup, full implementation of a Limited Site Assessment, and preparation of Reimbursement Application #1.

Approximately 2,000 gallons of contaminated water was removed and recycled during initial release response. No other waste management was reported during environmental assessment activities.

This application includes three (3) invoices from Environmental Pollution Consultants, Inc. (EPC), and one (1) invoice directly paid by the RP totaling **\$20,795.15**. Included in EPC's invoices are charges from: McCray Drilling (\$3,811.75), Jim's Tank Service (\$2,512.75), and Scott's Underground Construction Company (\$1,240.00).

The consultant and the RST Case Manager have each prepared a summary of activities. (See attachments).

**RECOMMENDATION:**

The claimed cost of **\$20,795.15** was checked against documentation provided. **An adjustment of \$1,240.00 to remove line test costs that were part of line repairs is recommended.** Copies of the Cost Summary Sheet and all recap sheets provided by the RP are attached.

**The staff recommends payment as follows:**

<b>Claim filed- Form TF-1</b>	<b>\$20,795.15</b>
<b>Less: Deductible</b>	<b>- 7,500.00</b>
<b>Less: Adjustments</b>	<b>- <u>1,240.00</u></b>
<b>Total Net Claim</b>	<b><u>\$12,055.15</u></b>

It is recommended that the claim made by the RP be considered in the amount of **\$12,055.15.**

48000019-01 LUST #48-0022 MIM, JT



# Approved Work Plans

48000019 48-0022 EXXON CIRCLE N SOUTH

	<u>Date</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	07/27/2023	Request Limited Site Assessment	EPC	\$16,000.00
				<u>\$16,000.00</u>

**APPLICATION FOR REIMBURSEMENT**  
from the  
**PETROLEUM STORAGE TANK TRUST FUND**

RECEIVED  
MAR 11 2024  
DEQ - RST

(1) ADEQ Facility Identification Number: 48000019

(2) Responsible Party Information:

Company Name	<u>JRM4</u>
Contact Person	<u>Jackie McClure</u>
Address	<u>P.O. Box 47</u>
City and State	<u>Harrisburg, Arkansas</u>
Zip Code	<u>72432</u>
Phone	<u>870-793-2213</u>

(3) Release Location

Facility Name	<u>Exxon Circle N South</u>
Address	<u>1414 N. Main</u>
City and State	<u>Brinklet, Arkansas, 72432</u>

(4) Type of Tank (check only one):

Aboveground                       Underground

(5) Type of Product Released:

Gasoline       Kerosene       Jet Fuel       Diesel       Heating Oil

Aviation Gas       Used Motor Oil       Other  (list) \_\_\_\_\_

Date of Release 4/30/2023      Release (LUST) Number 48-0022

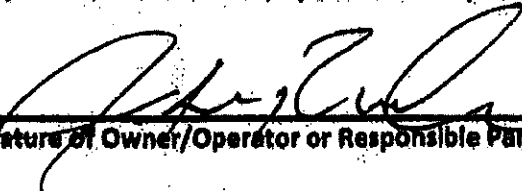
**CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I also certify that the amounts claimed for reimbursement under this application have been paid in full. I further certify that I have the authority to submit this application on behalf of

JRM4

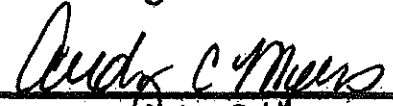
Jackie McClure

Type/Print name of Owner/Operator or Responsible Party

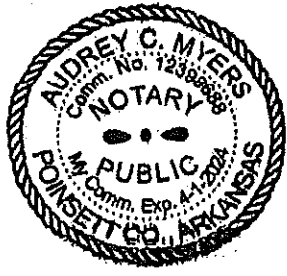
  
Signature of Owner/Operator or Responsible Party

**ACKNOWLEDGEMENT**

Sworn to and subscribed before me this 15 day of February, 2024.

  
Notary Public

My Commission Expires: 4-1-2024



**PROOF OF PAYMENT AFFIDAVIT**

I, David L. Diehl being of sound mind, am responsible to ensure this application is completed per regulatory requirements. I have personal knowledge of the contents of this document; all of which are true and correct to the best of my knowledge. Furthermore, as President of EPC, Inc., I certify that, as of this date, EPC, Inc. has been paid in full by JRM4 for the invoices contained in this reimbursement request:

Invoice Number	Invoice Date	Invoice Amount
ECNS-001	5/23/2023	\$4,015.90
ECNS-002	11/3/2023	\$12,451.50
ECNS-003	12/28/2023	\$575.00
<b>Total</b>		<b>\$17,042.40</b>

RP Directly Paid Inv. (JP)  
 + \$3,752.75 = \$20,795.15  
 Total Claim

Signed this 6 day of MARCH, 2024

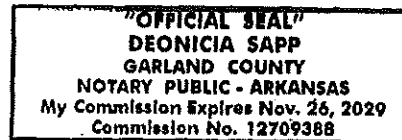
[Signature]  
 \_\_\_\_\_  
 David L. Diehl, President

**ACKNOWLEDGEMENT**

Sworn to and subscribed before me this 6<sup>th</sup> day of March, 2024.

[Signature]  
 \_\_\_\_\_  
 Notary Public

My Commission Expires: 11.26.2029



Interim Request No.	1	<b>COST SUMMARY SHEET</b>				
Consultant /Responsible Party: EPC, Inc./JRM4, Inc.						
Facility Identification #: 48000019		Facility Name: Exxon Circle N South				
Dates current costs Incurred:	From	05/01/23	to	01/04/24	Request Date: 01/04/24	
<b>1. DIRECT LABOR COST (attach labor recap)</b>						
	Hours	Actual Cost				
Principal/Managerial	24.25	\$1,309.50				
Professional/Technical	41.50	\$2,241.00				
Support	0.00	\$0.00				
Totals	65.75	\$3,550.50				
Total Actual Labor Costs x 3					\$10,651.50	
<b>2. FIXED RATE COSTS (List by category - attach recap)</b>						
	Actual Cost					
Equipment Rental	\$75.00					
Per Diem (meals only, with documented overnight stay)	\$0.00					
Mileage	\$730.80					
Other	\$3,752.75					
Total Fixed Rate Costs	\$4,558.55					
<b>3. OTHER DIRECT COSTS (List by category - attach recap)</b>						
	Actual Cost					
Lodging	\$0.00					
Laboratory	\$430.00					
Subcontracts	\$3,811.75					
Supplies	\$0.00					
Other	\$0.00					
Total Other Direct Costs	\$4,241.75					
4. Reimbursement Preparation Cost for RA#(s)	1	(\$500 or \$1000)			\$500.00	
<b>5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)</b>					\$19,951.80	
6. Markup on Total Other Direct Costs (maximum 20%)					\$843.35	
<b>7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)</b>					\$20,795.15	
A. Total Reimbursement Requested to Date Including Above:					\$20,795.15	
B. Less Amount Deductible (\$25,000, \$15,000, or \$7,500)					\$7,500.00	
C. Less Amount Previously Retained/Disallowed by RST:					\$0.00	
D. Less Amount Previously Received (Reimbursed by ADEQ):					\$0.00	
E. Amount of this Request (same as line 7 above unless it is the 1st Request):					\$13,295.15	

















**Proof Of Payment Affidavit**

I, Jackie McClure, being of sound mind, am responsible to ensure the contents of the Reimbursement application for the Exxon Circle N South facility is completed per regulatory requirements. I have personal knowledge of this document, all of which is true and correct to the best of my knowledge.

Furthermore, as owner of the Exxon Circle N South facility, I certify that as of this date, Scotts Underground Construction Co., (Inv C-2023251) and Jim's Tank Service, (Inv 0550928TB) have been paid in full by JRM4, Inc., for the Invoices contained within the Reimbursement request.

Invoice Number	Invoice Date	Invoice Amount
C-2023251	5/1/23	\$1,240.00
0550928TB	5/9/23	\$2,512.75
Total		\$3,752.75

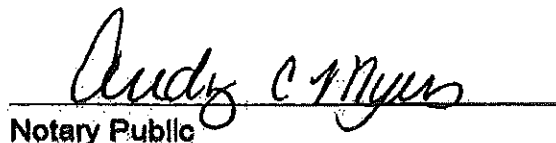
Signed this 15 day of February, 2024



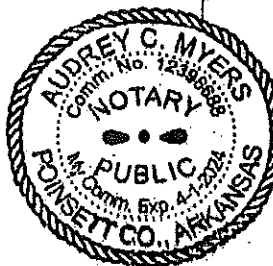
Jackie McClure

**Acknowledgment**

Sworn to and subscribed before me this 15 day of February, 2024

  
Notary Public

My Commission Expires: 4-1-2024







P.O. Box 281431  
 Memphis, TN 38168  
 Phone: 901-357-7237  
 Fax: 870-732-2029

# Invoice

<b>DATE</b>	<b>INVOICE #</b>
5/9/2023	050928TB

<b>BILL TO</b>	<b>SITE ADDRESS</b>
Jordan Quick Stop 205 S. Falls Blvd Wynne, AR 72396	Brinkley, AR

**PAID**  
05:09 2023

<b>P.O. NO.</b>	<b>TERMS</b>	<b>REMARKS</b>
	C.O.D.	

ITEM	DESCRIPTION	QTY	RATE	AMOUNT
Vac-Unit #1...	Vacuum PCW in drain with DOT Vac-Unit with DOT/OSHA/TWIC certified operator during regular business hours.	4	171.50	686.00
Disposal	Transported liquids to an EPA registered facility for proper recycling and or disposal.	1,997	0.72	1,437.84
Environmen...	Environmental and regulatory surcharge 9.7% of disposal total.		9.70%	139.47
Fuel Surcha...	Fuel Surcharge per hour per unit based on current DOE fuel index	4	36.76	147.04
Credit Card	Visa Master Card or American Express amounts charged will incur a 3% merchant fee surcharge.	1	102.40	102.40

Credit card payments will have a 3% processing fee added to the invoice.  Any/all JTS equipment are driven onto premises at signor's request or consent, signor hereby agrees to assume the risk of any resulting damage to premises or interior/exterior of equipment &/or accessories supplied by JTS, and agrees to indemnify and hold JTS harmless from any liability for damages incurred as a result thereof. Signor further agrees to pay for any and all damage resulting from the misrepresentation as to the chemical product or substance being hauled and/or due to a change in the chemical compound of the substance as a result of signor's mishandling or negligence. Failure to make full payment within thirty days of all charges incurred for services provided by JTS as detailed herein and in accordance with JTS' regularly published rates is basis for legal action, and signor will be responsible for all court costs and reasonable attorneys' fees incurred by JTS in collecting the amounts due under this contract.	<b>Sales Tax (0.0%)</b>	\$0.00
	<b>Total</b>	\$2,512.75
	<b>Payments/Credits</b>	-\$2,512.75
	<b>Balance Due</b>	\$0.00



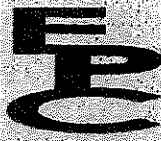












**ENVIRONMENTAL  
POLLUTION  
CONSULTANTS, INC.**

# INVOICE

Invoice No: **ECNS-001**  
 Project Management - Initial Response to a Release  
 Initial Response to a Release  
 Abatement - Initial Response/Abatement Report (IRR)

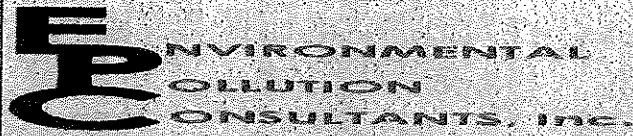
Invoice Date: **May 23, 2023**

Customer Information:  
 JRM 4, LLC.  
 P.O. Box 47  
 Harrisburg, Arkansas 72432

Job Location:  
 Exxon Circle N South  
 1414 N. Main  
 Brinkley, Arkansas 72021  
 ADEQ Facility ID# 48000019; LUST Case# 48-0022

Date	Description	Units	Unit Cost	Total
5/1/23	Project Management - Initial Response mileage	7.75 236.00	\$ 162.00 \$ 0.70	\$ 1,255.50 \$ 165.20
5/4/23	Project Management - Initial Abatement mileage	7.00 236.00	\$ 162.00 \$ 0.70	\$ 1,134.00 \$ 165.20
5/8/23	Initial Response/Abatement Report (IRR)	2.50	\$ 162.00	\$ 405.00
5/9/23	Initial Response/Abatement Report (IRR)	2.00	\$ 162.00	\$ 324.00
5/15/23	Initial Response/Abatement Report (IRR)	1.50	\$ 162.00	\$ 243.00
5/18/23	Initial Response/Abatement Report (IRR)	1.00	\$ 162.00	\$ 162.00
5/20/23	Initial Response/Abatement Report (IRR)	1.00	\$ 162.00	\$ 162.00
Due Upon Receipt			<b>TOTAL</b>	<b>\$4,015.90</b>

Environmental Pollution Consultants, Inc.  
 P.O. Box 8782 - Hot Springs Village, Arkansas - 71910  
 501-922-7156



# INVOICE

Invoice No: ECNS-002

Invoice Date: November 3, 2023

Project Management - Limited Site Assessment  
Limited Site Assessment Report

Customer Information:

JRM 4, LLC.  
P.O. Box 47  
Harrisburg, Arkansas 72432

Job Location:

Exxon Circle N South  
1414 N. Main  
Brinkley, Arkansas 72021  
ADEQ Facility ID# 48000019; LUST Case# 48-0022

Date	Description	Units	Unit Cost	Total
8/7/2023 - 8/14/23	PM - LSA Prep Bore Loc - Bids - Scope Mtg ADEE	1.50	\$ 162.00	\$ 243.00
8/17/23	PM - Site Mark - Disc w/Operator & City Water mileage	5.00 236.00	\$ 161.00 \$ 0.70	\$ 805.00 \$ 165.20
8/22/23	LSA - Drilling - Disc w/ ADEE on-site Mileage	10.25 236.00	\$ 162.00 \$ 0.70	\$ 1,660.50 \$ 165.20
8/23/23	Sample Delivery mileage	2.25 100.00	\$ 162.00 \$ 0.70	\$ 364.50 \$ 70.00
9/12/23	LSA Report	1.00	\$ 162.00	\$ 162.00
9/13/23	LSA Report	1.50	\$ 162.00	\$ 243.00
9/21/23	LSA Report	1.00	\$ 162.00	\$ 162.00
10/1/23	LSA Report	3.00	\$ 162.00	\$ 486.00
10/26/23	LSA Report	3.00	\$ 162.00	\$ 486.00
10/29/23	LSA Report	5.00	\$ 162.00	\$ 810.00
10/31/23	LSA Report	4.00	\$ 162.00	\$ 648.00
11/1/23	LSA Report Final - Assemble, scan, cd	5.00	\$ 162.00	\$ 810.00
11/2/23	LSA Report - RP Prep. Assemble, bind	0.50	\$ 162.00	\$ 81.00
8/24/23	McCray Drilling - Inv#1012708	1.00	\$ 4,574.10	\$ 4,574.10
9/5/23	Arkansas Analytical - Inv#K23SEP17	1.00	\$ 516.00	\$ 516.00
Due Upon Receipt			<b>TOTAL</b>	<b>\$12,451.50</b>

Environmental Pollution Consultants, Inc.  
P.O. Box 8782 - Hot Springs Village, Arkansas - 71910  
501-922-7156



ENVIRONMENTAL  
POLLUTION  
CONSULTANTS, Inc.

# INVOICE

Invoice No: ECNS-003

Invoice Date: January 4, 2024

Project Management - Reimbursement Application - 001

**Customer Information:**

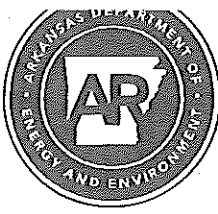
JRM 4, LLC.  
P.O. Box 47  
Harrisburg, Arkansas 72432

**Job Location:**

Exxon Circle N South  
1414 N. Main  
Brinkley, Arkansas 72021  
ADEQ Facility ID# 48000018; LUST Case# 48-0022

Date	Description	Units	Unit Cost	Total
8/22/23	Multi Rae 3000 PID (Company Equipment) - LSA * inadvertently left off Inv# ECNS-002	1.00	\$ 75.00	\$ 75.00
1/4/24	PM - Reimbursement Application - 001 Preparation	1.00	\$ 500.00	\$ 500.00
Due Upon Receipt			<b>TOTAL</b>	<b>\$575.00</b>

Environmental Pollution Consultants, Inc.  
P.O. Box 8782 - Hot Springs Village, Arkansas - 71910  
501-922-7156



**ARKANSAS**  
ENERGY & ENVIRONMENT

MEMORANDUM

To: *Matthew McGhee 4/3/24*  
Jacqueline Trotta, Trust Fund Administrator  
Assessment & Remediation Program, Office of Land Resources

Through: Blake Whittle, P.G., Groundwater Branch Manager *BW 4/2/24*  
Joshua Stevens, P.G., Geologist Supervisor, Regulated Storage Tanks *JS*  
A & R Program, OLR

From: David Frazier, Professional Geologist *DF*  
RST - A & R Program, OLR

Date: March 22, 2024

Subject: Technical Review of Reimbursement Application #1  
For Time Period: 5/1/23 – 1/4/24  
Amount Requested: \$13,295.15  
Exxon Circle N South [JRM4 LLC]  
1414 N Main; Brinkley, AR 72432  
LUST #48-0022 ID #48000019 AFIN: 48-00015

The following is in response to your memo to me dated 3/12/24.

1. Status of Release

- a) *At which step in the Subpart F process is the LUST case, i.e., Site Investigation, CAP, or FP Removal?*

A “NFA” determination was issued on 12/7/23. A Limited Site Assessment was requested on 7/27/23 and reported by Environmental Pollution Consultants Inc. on 11/14/23. RST staff completed a streamlined Exposure Assessment on 11/28/23, finding no regulatory concerns.

- b) *If the remedy has been selected, what are the clean-up goals? Identify any issues that may delay progress or resolution of the case.*

No cleanup was required. No unusual delays were experienced.

- c) *With the exception of investigation-derived wastes, if contaminated soil or ground water has been removed from the site, describe the quantity and type of contamination removed.*



Approximately 2000 gallons of contaminated water was removed and recycled during initial release responses. No other waste management was reported during environmental assessment activities.

## 2. Reimbursement Application

- a) *Briefly describe the activities for which reimbursement is requested and the specific work plan(s) or change order(s) (cost approvals) under which activities were authorized.*

The applicant is requesting reimbursement of costs incurred during the following activities:

- 1) Initial release responses prior to referral of the LUST case to the A&R workgroup;
- 2) Full implementation of a Limited Site Assessment, approved on 7/27/23; and
- 3) Preparation of RA#1.

- b) *Identify any activity that may conflict with Reg. 12 or that was not pre-approved by the technical staff.*

The following costs may be in violation of Rule 12:

Invoice #050928TB from Jim's Tank Service, a "merchant fee surcharge" for payment via credit card, in the amount of \$102.40;

Invoice #C-2023251 from Scott's Underground Construction Co. for "line tests", in the amount of \$1,240.00.

- c) *If you do not agree with the consultant's project summary, state the areas of disagreement. If the consultant's summary is incomplete, or no summary is provided, give a brief history of the project to date.*

The applicant's Project Summary reasonably reflects my understanding of the case.

## 3. Maps & Graphs

- a) *If not provided by the consultant in the application, please attach site maps that identify the location of the site and the area of the release within the site.*

The applicant has provided an aerial image of the facility illustrating the locations of soil borings installed during the LSA.

- b) *Include any data and/or graphs that illustrate relevant environmental information in support of your summary.*

I have no additional comments.

**Exxon Circle N South**  
1414 N. Main, Brinkley, Arkansas 72021  
Facility ID # 48000019 LUST Case # 48-0022; AFIN # 48-00015

May 1, 2023 through January 4, 2024

Activities conducted during the above referenced dates are for:

- Suspected/Confirmed release reported May 1, 2023.
- Line Tightness Tests - May 1, 2023.
- Initial Response to a Release Report (IRR) - May 22, 2023.
- Limited Site Assessment (LSA) - August 22, 2023.
- LSA Report - November 1, 2023.
- No Further Action Letter received - December 7, 2023.
- Reimbursement Application - 001 - January 4, 2024.

**Assessment Findings:**

**Soil**

- A total of three (3) soil borings were advanced for the Limited Site Assessment investigation activities.
- The soils encountered were primarily clay silts.
- Petroleum constituents in soil were only minimally detected in one boring (LSA B-1 @ 44'). Petroleum constituents in soil were not detected in LSA B-2 & LSA B-3 borings.

**Groundwater**

- One (1) grab groundwater sample was collected from a open borehole (LSA B-1).
- Groundwater contaminant concentrations were generally moderate.

**Free Product**

- Free product was not detected at any boring location.

**CONCLUSIONS**

**Site Assessment**

Based on PID readings, petroleum contamination in shallow soil was not detected. PID readings only indicated the presence of petroleum constituents beginning at depths greater than 36 feet below ground surface. Since LUST Case # 48-0022 was initiated by a surface spill and the petroleum contamination was detected relatively deep, the contamination detected is most likely not related to LUST Case #48-0022.

**RECOMMENDATIONS**

No further action related to LUST Case# 48-0022.

January 4, 2024

## LUST CASE DEVELOPMENT

May 1, 2023 - LUST Case #48-0022 was initiated as a suspected/confirmed release at the Exxon Circle N South facility in Brinkley Arkansas.

Reportedly, in the evening of April 30, 2023, a customer filling up his car on pump #'s 3 / 4 noticed fuel running across the ground near pump #'s 9 / 10. The station operator immediately hit the emergency shut off to all pumps. Police and the fire department responded. Absorbent material was placed over the entire spill area. Power was shut off to pump #'s 9 / 10 and the police and fire department informed the operator that he could resume selling fuel. Later that evening another customer noticed fuel running across the ground near pump #'s 9 / 10 again. The station operator immediately hit the emergency shut off to all pumps again and contacted JRM4, stating he had a problem. Absorbent material was again placed over the entire spill area. Police and the fire department again responded and taped off the area. The pumps remained turned off. On May 1, 2023, JRM4 technicians discovered that pump #'s 9 / 10 had been hit, most likely by a car, on the #9 side, misaligning the pump and piping. The piping shear valves broke on both the #9 and #10 piping assemblies. The valve on #10 closed completely, however, the valve on #9 did not, due to the mechanisms control arm getting stuck on the misaligned piping.

JRM4 realigned the pump and piping and replaced the shear valves. Subsequent tightness testing passed and the fuelling system was placed back on line, however, pump#'s 9 & 10 were bagged off and not put in service.

Prior to the arrival of EPC, (May 1, 2023) the City of Brinkley, Sewer & Water Department had already begun flushing the storm water drain. Vapor readings were collected from storm water drain manways after the City had stopped flushing the drain line. Due to elevated vapor readings being collected from several storm water drain manways on May 1, 2023, an additional flush with surfactant was recommended and conducted on May 4, 2023. A vacuum truck was utilized to collect flush water ~ 1/4 mile down the drain line. Approximately, 2,000 gallons of flush water was collected. A waste manifest is provided in Attachment IV.

Approximately, 50 gallons of product & water were removed from the sump beneath pump #'s 9 / 10 and transported the JRM4 facility in Harrisburg, Arkansas, where it was placed in a holding tank for bulk disposal.

No product was collected from the storm drain system, due the flushing of the storm water drainage system by the City of Brinkley. The drainage systems outfall was reported to be approximately 3/4 miles south of the release location in a ditch between Dr. Martin Luther King Jr. Drive and 4<sup>th</sup> street. No product or sheens were observed at this location. The ditch was inspected for ~ 1/4 mile. Based on inventory records approximately 390 gallons of product was released.

**Expended Costs**

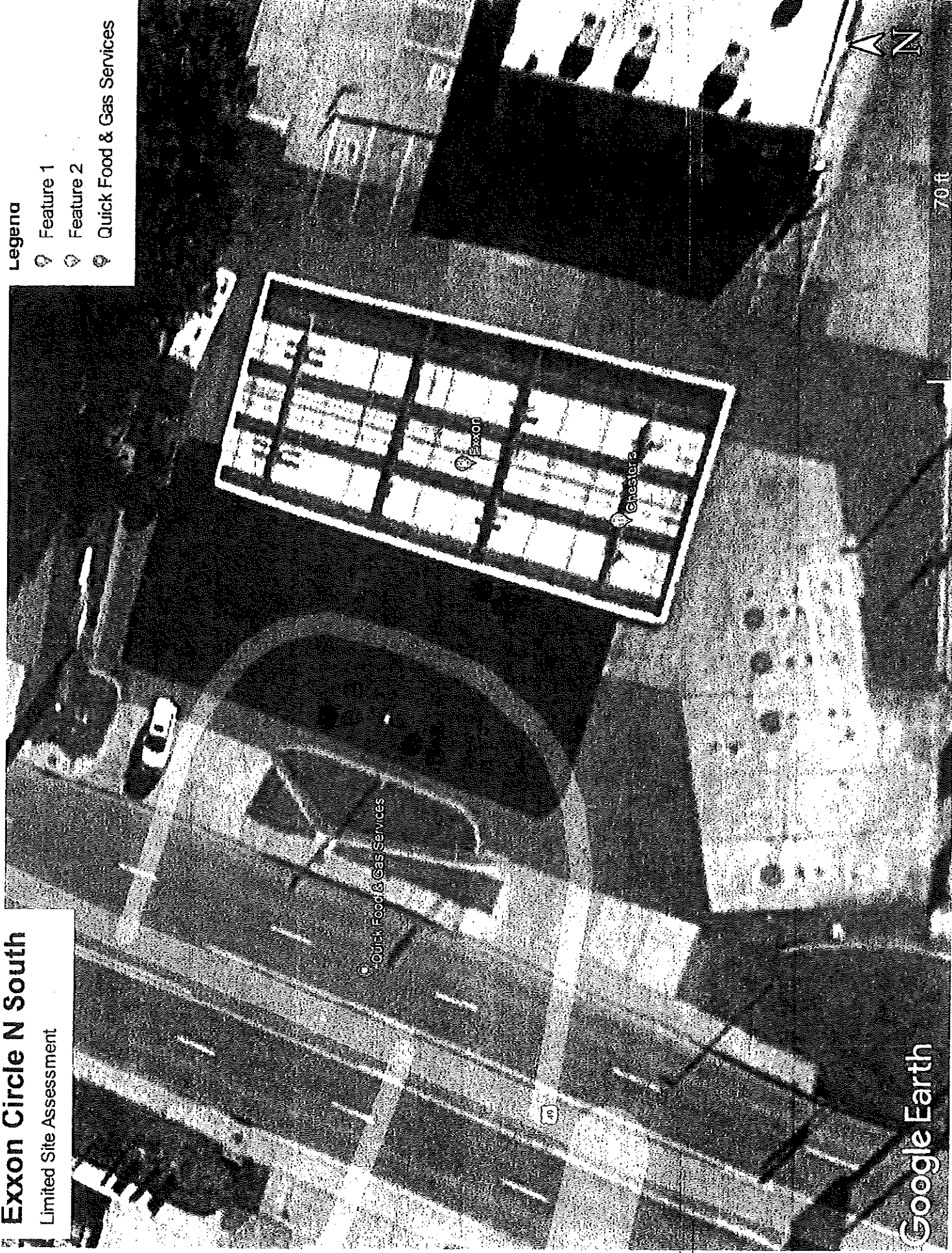
- Initial Response - May 1, 2023	\$2,719.90
- Line Tightness Tests - May 1, 2023.	\$1,240.00
- IRR Waste Disposal - May 4, 2023	\$2,512.75
- Initial Response to a Release Report (IRR) - May 20, 2023.	\$1,296.00
- Limited Site Assessment (LSA) - August 7, 2023 thru August 23, 2023.	\$8,638.50
- Limited Site Assessment Report (LSAR) - November 2, 2023.	\$3,888.00
- Reimbursement Application - 001- January 4, 2024	\$500.00
<b>Total Expended Costs</b>	<b>\$20,795.15</b>
<b>Current Reimbursement Request</b>	<b>\$20,795.15</b>

# Exxon Circle N South

Limited Site Assessment

## Legend

- Feature 1
- Feature 2
- Quick Food & Gas Services



Google Earth

70 ft



**MEMORANDUM OF REVIEW**  
**Reimbursement Request**  
**Petroleum Storage Tank Trust Fund**

From: Petroleum Storage Tank Trust Fund Staff

Date: May 29, 2024

Subject: **Jordan's Kwik Stop #39**  
**101 W. Broad St.**  
**Lepanto, AR 72354**  
**ID #56001644 LUST #56-0016 AFIN 56-00414**

A request for reimbursement (#5) for costs incurred during remediation of an UST site was received from the Responsible Party (RP) on January 3, 2024. The RP of this site reported a diesel release (#56-0016) on February 22, 2015, when a vent line rupture occurred at the underground diesel tank allowing storm water to enter the tank and diesel to be released to the surface. The name and the address of the RP:

**JRM 4 LLC**  
**Attn: Jackie McLure**  
**P.O. Box 47**  
**Harrisburg, AR 72432**

The period covered by this application is March 3, 2020 through March 6, 2023. Remediation activities for which reimbursement is requested include: development of a Free Product Removal Work Plan and preparation of Reimbursement Application #5.

To date, a total of 2,566 gallons of impacted water/free product diesel and 681.54 tons of contaminated soils were removed from path of migration the surface spill followed at the time of the release. Additionally, approximately 382.8 vapor-equivalent gallons of refined petroleum products and 8,400 gallons of impacted groundwater were removed during pilot test.

This application includes one (1) invoice from Environmental Pollution Consultants, Inc. (EPC) totaling **\$28,247.96**. Included in EPC's invoice are charges from: Pollution Management, Inc. (\$22,129.13).

The consultant and the RST Case Manager have each prepared a summary of activities. (See attachments).

**RECOMMENDATION:**

The claimed cost of \$28,247.96 was checked against documentation provided. An adjustment of \$20,384.82 to reduce Work Plan development costs to the approved Work Plan amount is recommended. Copies of the Cost Summary Sheet and all recap sheets provided by the RP are attached.

The staff recommends payment as follows:

Claim filed- Form TF-1	\$28,247.96
Less: Deductible	- 00.00
Less: Adjustments	<u>-20,384.82</u>
Total Net Claim	<u>\$ 7,863.14</u>

It is recommended that the claim made by the RP be considered in the amount of \$7,863.14.

## Approved Work Plans

56001644 56-0016 JORDAN'S KWIK STOP #39

	<u>Date</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	03/17/2015	Revised Interim Corrective Action Work Plan	EPC	\$20,000.00
02	04/08/2015	C.O. to Interim CAP	EPC	\$104,511.00
03	08/07/2015	Revised Site Assessment Work Plan	EPC	\$66,605.72
04	09/27/2016	Additional Site Assessment Work Plan	EPC	\$2,181.50
05	03/28/2017	Revised 2nd Site Assessment Work Plan	EPC	\$39,096.23
06	12/14/2017	3rd Additional Site Assessment Work Plan	EPC	\$60,101.91
07	08/12/2019	Revised Pre-Remediation Pilot Test WP & CE	EPC	\$30,291.87
08	11/04/2019	CO #1 Revised Pilot Test WP	EPC	(\$138.00)
				<hr/>
				\$322,650.23
				<hr/> <hr/>



# Approved Payments

56001644

560016

JORDAN'S KWIK STOP #39

<u>Date Approved</u>	<u>Amount</u>
9 /29/2015	\$94,252.35
6 /28/2016	\$43,382.89
12/5 /2018	\$87,410.53
6 /24/2020	\$31,777.88
	<hr/>
	<b>\$256,823.65</b>
	<hr/>

**APPLICATION FOR REIMBURSEMENT**  
from the  
**PETROLEUM STORAGE TANK TRUST FUND**

(1) ADEQ Facility Identification Number: 56001644

(2) Responsible Party Information:

Company Name JRM 4, LLC.

Contact Person Jackie Mclure

Address P.O. Box 47

City and State Harrisburg, Arkansas

Zip Code 72432

Phone 870-243-6243

(3) Release Location

Facility Name Jordan's Kwik Stop #39

Address 101 West Broad Street

City and State Lepanto, Arkansas 72354

(4) Type of Tank (check only one):

Aboveground

Underground

(5) Type of Product Released:

Gasoline

Kerosene

Jet Fuel

Diesel

Heating Oil

Aviation Gas

Used Motor Oil

Other  (list) \_\_\_\_\_

Date of Release 2/22/2015

Release (LUST) Number 56-0016

Facility ID# 56001644

Date 02/07/23

**CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I also certify that the amounts claimed for reimbursement under this application have been paid in full. I further certify that I have the authority to submit this application on behalf of

JRM 4, LLC.

Jackie R. McClure

Type/Print name of Owner/Operator or Responsible Party

*Jackie R. McClure*

Signature of Owner/Operator or Responsible Party

**ACKNOWLEDGEMENT**

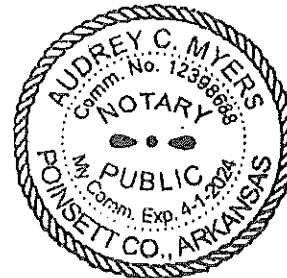
Sworn to and subscribed before me this 16 day of Feb, 2023.

*Audrey C Myers*

Notary Public

My Commission Expires:

4-1-2024





Interim Request No. 5 **COST SUMMARY SHEET**

Consultant /Responsible Party: Environmental Pollution Consultants, Inc./JRM 4, LLC.

Facility Identification #: 56001644 Facility Name: Jordan's Kwik Stop #39

Dates current costs incurred: From 03/03/20 to 02/07/23 Request Date: 02/07/23

**COST SUMMARY**

1. DIRECT LABOR COST (attach labor recap)	Hours	Actual Cost
Principal/Managerial	6.50	\$351.00 ✓
Professional/Technical	0.00	\$0.00 ✓
Support	0.00	\$0.00 ✓
<b>Totals</b>	<b>6.50</b>	<b>\$351.00</b> ✓

Total Actual Labor Costs x 3 **\$1,053.00**

2. FIXED RATE COSTS (List by category - attach recap)	Actual Cost
Equipment Rental	\$0.00 ✓
Per Diem (meals only, with documented overnight stay)	\$0.00 ✓
Mileage	\$140.00 ✓
Other	\$0.00 ✓
<b>Total Fixed Rate Costs</b>	<b>\$140.00</b>

3. OTHER DIRECT COSTS (List by category - attach recap)	Actual Cost
Lodging	\$0.00 ✓
Laboratory	\$0.00 ✓
Subcontracts	\$22,129.13 ✓
Supplies	\$0.00 ✓
Other	\$0.00 ✓
<b>Total Other Direct Costs</b>	<b>\$22,129.13</b>

4. Reimbursement Preparation Cost for RA#(s) 5 (\$500 or \$1000) **\$500.00**

5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep) **\$23,822.13**

6. Markup on Total Other Direct Costs (maximum 20%) **\$4,425.83**

7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement) **\$28,247.96**

A. Total Reimbursement Requested to Date Including Above:	292,590.85 +
B. Less Amount Deductible (\$25,000, \$15,000, or \$7,500)	7,500.00 -
C. Less Amount Previously Retained/Disallowed by RST:	19.24 -
D. Less Amount Previously Received (Reimbursed by ADEQ):	256,823.65 -
E. Amount of this Request (same as line 7 above unless it is the 1st Request):	28,247.96 *



















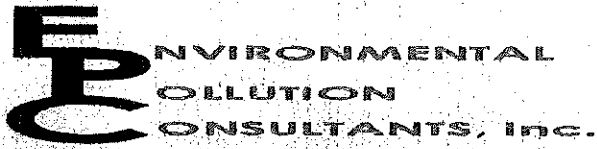












# INVOICE

Invoice No: JKS-39-006 Invoice Date: February 7, 2023  
 Proj. Management - Free Product Removal Work Plan - Air Sparge System Reimbursement Application -005

**Customer Information:** JRM 4, LLC. P.O. Box 47 Harrisburg, Arkansas 72432  
**Job Location:** Jordan's Kwik Stop #39 101 West Broad Steet Lepanto, Arkansas 72354 ADEQ Facility ID# 56001644; LUST Case# 56-0018

Date	Description	Units	Rate	Total
<b>Project Management (EPC Labor - David Diehl)</b>				
04/14/22	FPRWP - discussions with contractor - Data transfer	3.00	\$ 162.00	\$ 486.00
04/25/22	FPRWP - discussions with contractor - review of draft WP outline	0.50	\$ 162.00	\$ 81.00
06/14/22	FPRWP - discussions with contractor - final Scoping Meeting	3.00	\$ 162.00	\$ 486.00
Labor Subtotal				\$ 1,053.00
<b>EPC Equipment - Dodge Ram - Mileage</b>				
06/14/22	T1 - Professional Services Scoping Meeting	200.00	\$ 0.70	\$ 140.00
Mileage Subtotal				\$ 140.00
<b>Third Party Venders (Work Plan Preparation)</b>				
06/30/22	T1 - Professional Services Inv# 49291	1.00	\$ 26,554.96	\$ 26,554.96
Vender Subtotal				\$ 26,554.96
Reimbursement Application - 005		1.00	\$ 500.00	\$ 500.00
Page Total				\$ 28,247.96



# ARKANSAS ENERGY & ENVIRONMENT

## MEMORANDUM

**To:** *Matthew McGhee 3/1/24*  
Jacqueline Trotta, Trust Fund Administrator  
Assessment & Remediation Program, Office of Land Resources

**Through:** Blake Whittle, P.G., Groundwater Branch Manager *BW 3/1/24*  
Joshua Stevens, P.G., Geologist Supervisor, Regulated Storage Tanks *JS*  
A & R Program, OLR

**From:** David Frazier, Professional Geologist *DF*  
RST, A & R Program, OLR

**Date:** February 26, 2024

**Subject:** Technical Review of Reimbursement Application #5  
For Time Period: 3/3/20 – 2/7/23  
Amount Requested: \$28,247.96  
Jordan's Kwik Stop #39 [JRM 4 LLC]  
101 W. Broad St., Lepanto, AR 72354  
ID #56001644      LUST #56-0016      AFIN: 56-00414

The following is in response to your memo to me dated 1/5/24.

### 1. Status of Release

- a) *At which step in the Subpart F process is the LUST case, i.e., Site Investigation, CAP, or FP Removal?*

This site is entering the free product removal phase. A Free Product Removal Work Plan was submitted by Pollution Management Inc. (PMI) on 9/6/23 and approved on 11/7/23. The selected remediation technology is the installation and operation of a fixed dual-phase extraction and air sparge system (DPE/AS).

In August, 2023, the RP changed consultants from Environmental Pollution Consultants (EPC) to PMI.

- b) *If the remedy has been selected, what are the clean-up goals? Identify any issues that may delay progress or resolution of the case.*

An Exposure Assessment was completed on 1/11/19 finding no unacceptable exposures to HHE; however, free product in contact with groundwater must be removed to the maximum extent practicable.

Cleanup was delayed for two years. A Free Product Removal Work Plan was requested on 6/26/20. EPC submitted a plan on 6/28/22. Staff informed the RP that EPC's plan violated the Trust Fund Cost Control Guidelines. Ultimately, the RP changed consultant to PMI in August, 2023.

- c) *With the exception of investigation-derived wastes, if contaminated soil or ground water has been removed from the site, describe the quantity and type of contamination removed.*

During emergency responses, a total of 2,566 gallons of impacted water/free product diesel and 681.54 tons of contaminated soils were removed from the path of migration that the surface spill followed at the time of the release.

Additionally, approximately 382.8 vapor-equivalent gallons of refined petroleum products and 8,400 gallons of impacted groundwater were removed during a pilot test.

## 2. Reimbursement Application

- a) *Briefly describe the activities for which reimbursement is requested and the specific work plan(s) or change order(s) (cost approvals) under which activities were authorized.*

The applicant is requesting reimbursement for development of a Free Product Removal Work Plan, requested on 6/26/20; and preparation of RA#5.

- b) *Identify any activity that may conflict with Reg. 12 or that was not pre-approved by the technical staff.*

EPC's invoice includes a 20% markup of PMI's invoice; however, PMI's labor charges include "loaded rates". Furthermore, EPC contracted with PMI for plan development without consulting with RST staff and without soliciting competitive bids.

RA#5 significantly exceeds the approved amount for work plan preparation (Task 1).

- c) *If you do not agree with the consultant's project summary, state the areas of disagreement. If the consultant's summary is incomplete, or no summary is provided, give a brief history of the project to date.*

EPC has provided a project summary.

Cont'd

**3. Maps & Graphs**

- a) *If not provided by the consultant in the application, please attach site maps that identify the location of the site and the area of the release within the site.*

EPC has provided a map and exhibits from PMI's Free Product Removal Work Plan.

- b) *Include any data and/or graphs that illustrate relevant environmental information in support of your summary.*

An Installation and Startup Report is past due since 2/5/24. PMI cites weather delays.

Although the subject release was due to a diesel spill, free product gasoline persists on groundwater and within the UST basin.



December 18, 2023

RECEIVED

JAN 03 2024

DEQ - RST

Ms. Jacqueline Trotta  
**Petroleum Storage Tank Trust Fund Administrator**  
**Office of Land Resources - Assessment and Remediation**  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

RE: Reimbursement Application - 005  
Jordan's Kwik Stop #39  
Facility ID# 56001644; LUST Case# 56-0016; AFIN# 56-00308

Dear Ms. Trotta:

On behalf of JRM 4, LLC., Environmental Pollution Consultants, Inc. (EPC) is resubmitting Reimbursement Application - 005 which was submitted on February 22, 2023 for the Jordan's Kwik Stop #39 facility.

The Reimbursement is for the preparation of the Free Product Removal Work Plan (FPRWP) submitted on December 7, 2022.

On August 4, 2023, the case manager deemed the Application as, prematurely submitted, reportedly due to the work plan not being Approved. After minor revisions, the FPRWP was approved on November 7, 2023.

If you have any questions please contact me at 501-922-7156.

Sincerely,

A handwritten signature in black ink, appearing to read "David L. Diehl".

David L. Diehl, PG  
President/Environmental Pollution Consultants, Inc.

cc: JRM4, LLC - Jackie McClure  
File - Jordans 39

# PROJECT SUMMARY

## Jordan's Kwik Stop #39

101 West Broad Street, Lepanto, Arkansas 72354

Facility ID# 56001644: LUST Case# 56-0016

March 3, 2020 through February 7, 2023

Activities conducted during the above referenced dates are for:

- Additional Free Product Removal Work Plan.

The selected in-situ remediation technology consists of air-sparging combined with vapor extraction. A series of sparge wells and extraction wells located in the zone of contamination will be connected to a fixed-base remediation system via underground piping. The well configuration will provide overlapping coverage to ensure that the sparge air is captured and removed from the subsurface. Hydrocarbon vapors that have been removed from the ground are burned inside an electric catalytic oxidizer and discharged into the atmosphere.

### LUST Case #56-0016 Development:

February 22, 2015 - a release was reported to ADEQ by JRM 4, LLC, due to the observance of free product impacting surface areas at the facility and flowing down-gradient to adjacent properties surrounding the facility. Free product (diesel) was expelled out of the UST due to rainwater runoff entering the UST through recently damaged vent lines.

The expelled free product traveled south across a vacant lot towards Holmes Street and onto the Lepanto City Post Office sidewalks parking lot and landscaped areas. The product continued to follow storm water drainage culverts and ditch lines flowing north and south along Alexander Street and west down Holmes Street.

February 22- 28, 2015 - Emergency response activities included the removal of product/water from the UST and the ground surface via vacuum truck and pressure washing areas including streets, sidewalks, and parking lots. Emergency response activities, conducted by the Lonny M. Goodwin Co. (LMG) and TAS Environmental, Inc., (TAS) included the removal of approximately 1500 gallons of product/water from ground surface areas via vacuum truck and pressure washing areas of Holmes Street and the sidewalks and parking lot of the Lepanto City Post Office.

March 2, 2015 - LUST Case #56-0016 was referred to the RST Technical Branch, and assigned to Jarrod Zweifel as Case Manager.

March 3, 2015 - The vent lines were repaired; tank and line tightness testing indicated all systems were tight.

March 12, 2015 - In an e-mail correspondence, the ADEQ required JRM 4, LLC to prepare a work plan and cost estimate for performing free product removal activities at properties surrounding the Jordan's Kwik Stop #39 facility in Lepanto, Arkansas. In order to expedite corrective action measures, the ADEQ requested, a not to exceed cost estimate for the corrective action activities.

March 16, 2015 - An Interim Corrective Action (ICA) Work Plan (WP) was submitted by EPC to the ADEQ. Revisions were requested by the ADEQ and were submitted by EPC later that same day.

March 17, 2015 - The Revised ICAWP was approved for implementation.

March 18 - 24, 2015 - ICA activities were performed.

March 23, 2015 - In an e-mail correspondence, the ADEQ required JRM 4, LLC to prepare a change order to the March 16, 2015 ICA work plan and cost estimate. The change order was for performing additional ICA activities at the three (3) residential lots located to the south of the Jordan's #39 facility having obvious diesel impacts to surface soils and shallow subsurface soil to depths of approximately 24 inches. The ICA measures were necessary to abate the free product impacted surface areas surrounding the subject facility.

Additionally, the ADEQ requested a Site Assessment Work Plan to investigate the vertical & horizontal extent of contamination concerning LUST Case # 56-0016.

March 27, 2015 - The ICA change order was submitted.

April 8, 2015 - ADEQ approved the ICA change order. Due to inclement weather, the additional ICA activities were postponed until May 4, 2015.

May 30, 2015 - The Site Assessment Work Plan (SAWP) was submitted to ADEQ.

August 7, 2015 - ADEQ approved the SAWP.

September 14, 2016 - The assessment activities were implemented and the site assessment Report (SAR), dated December 27, 2015 was submitted.

July 1, 2016 - ADEQ requests an Additional Site Assessment Work Plan (ASAWP) to obtain additional groundwater data. The work plan was not completed by the August 1, 2016 deadline due the ADEQ inadvertently not copying the consultant of record (EPC, Inc.) of the request. The ADEQ informed EPC of the error on August 9, 2016 and posed a new submittal date of September 9, 2016 for the work plan to be submitted.

September 13, 2016 - The ASAWP was submitted.

September 27, 2016 - ADEQ approves the ASAWP.

November 22, 2016 - ADEQ requested a 2<sup>nd</sup> Additional Site Assessment Work Plan and Cost Estimate to evaluate soil and groundwater conditions around two monitoring wells which had exhibited free product.

July 18, 2017 - The 2<sup>nd</sup> Additional Site Assessment Report was submitted.

August 23, 2017 - The ADEQ requested a 3<sup>rd</sup> Additional Site Assessment Work Plan and Cost Estimate to gather data to further define the on-site extent free product identified at the site.

December 14, 2017 - The 3<sup>rd</sup> ASAWP was approved.

February 26, 2018 - The 3<sup>rd</sup> ASAWP was implemented.

July 10, 2018 - The 3<sup>rd</sup> ASA Report was submitted.



January 22, 2019 - The ADEQ requested a Free Product Removal Work Plan (FPRWP) and Cost Estimate to remove free product identified at the site.

February 12, 2019 - A scoping meeting was conducted at ADEQ offices. The conclusion of the meeting was to perform an extraction point pilot test prior to the development of the FPRWP. The ADEQ requested that the preparation of the FPRWP, requested on January 22, 2019, be suspended until extraction point pilot testing can be completed and reported.

April, 3, 2019 - The Pre-remediation Pilot Test (PRPT) work plan was submitted.

May 6, 2019 - ADEQ requested revisions to the PRPT work plan.

May 6, 2019 - The revised PRPT work plan was submitted.

August 12, 2019 - The revised PRPT work plan was Approved.

October 29, 2019 - The revised PRPT work plan was Implemented.

March 3, 2020 - The PRPT Report was submitted.

June 26, 2020 - ADEQ requested the preparation of a Free Product Removal Work Plan.

June 27, 2022 - The Free Product Removal Work Plan was submitted.

December 6, 2022 - The Revised Free Product Removal Work Plan was submitted.

STOP SIGN

ARKANSAS HIGHWAY 140

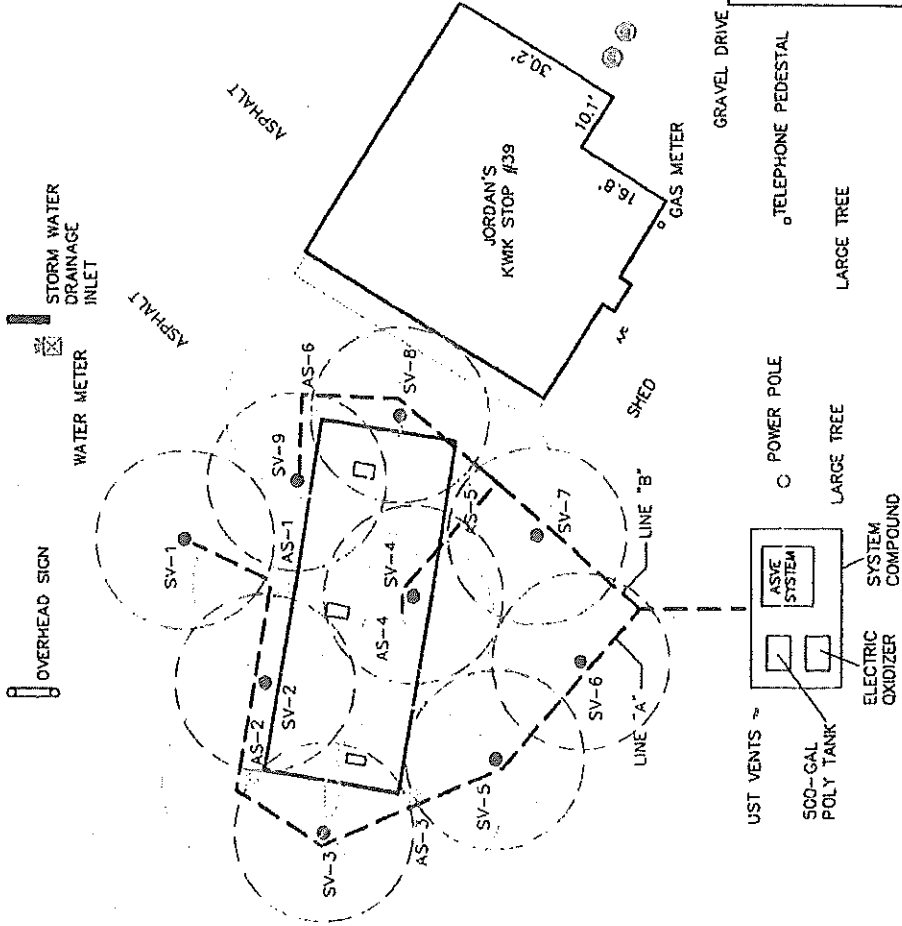
SOUTH 135TH STREET

POWER POLE

FIRE HYDRANT

POWER POLE

ALEXANDER STREET



LEGEND

- AS-# AIR-SPARGING WELL
- VE-# VAPOR EXTRACTION WELL
- MONITORING WELL
- TANK BASIN OBSERVATION WELL
- SANITARY SEWER MANHOLE
- OVERHEAD ELECTRIC



JOB NUMBER  
**EPCI-12631**  
DRAWING NUMBER  
**3**

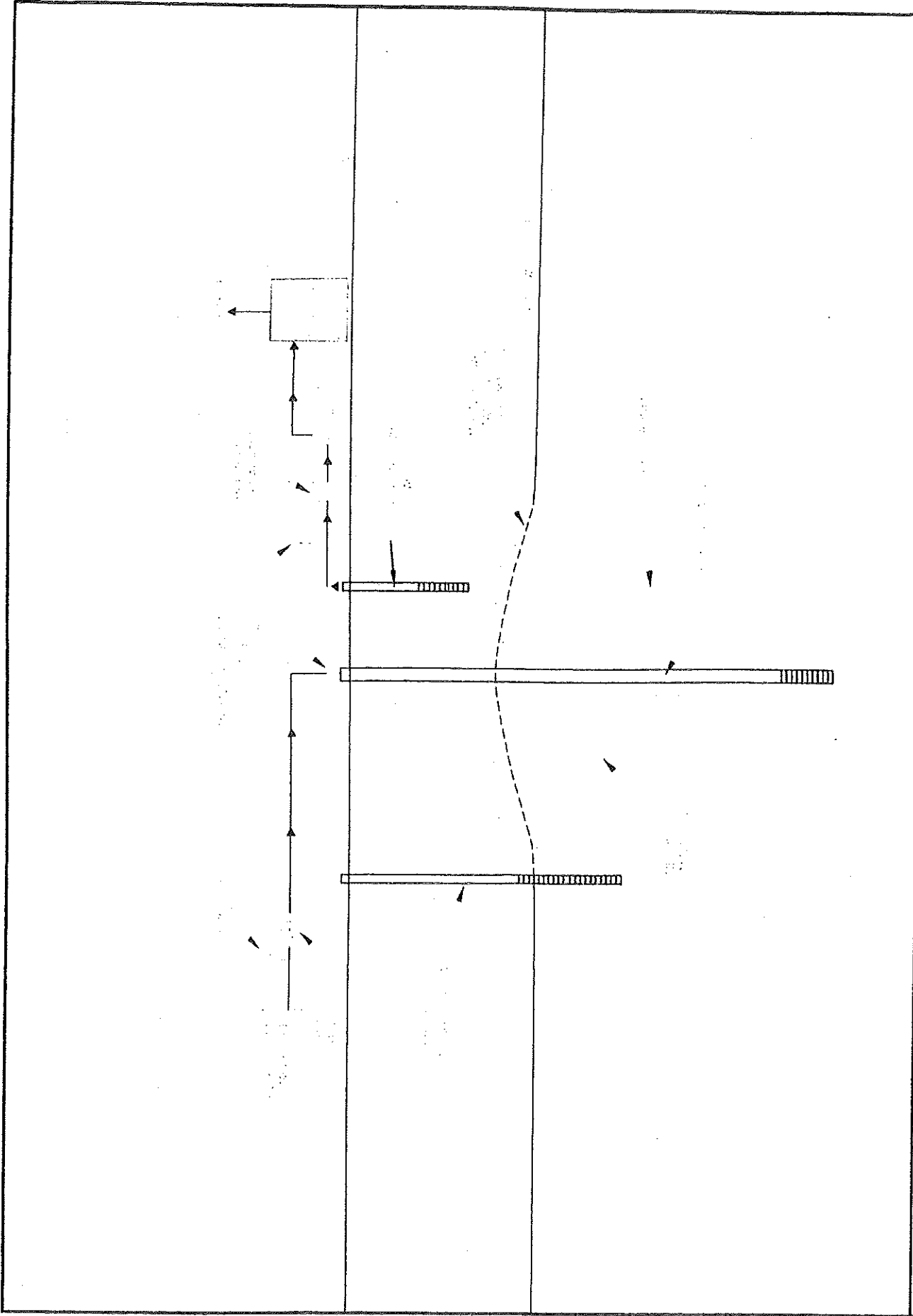
SITE PLAN with  
PROPOSED AS/VE SYSTEM LAYOUT


FREE PRODUCT REMOVAL WORK PLAN  
JORDAN'S KWIK STOP #39  
101 WEST BROAD STREET  
LEPANTO, ARKANSAS 72354

SUBMITTED: S. PATTERSON  
DRAWN: S. PATTERSON  
CHECKED: S. RASBERRY  
DATE: APR 21, 2021

CIVIL ENGINEERING AND ENVIRONMENTAL SERVICES  
3512 South Shackleford Road  
Little Rock, Arkansas 72205  
(501) 221-7122 FX (501) 221-7775



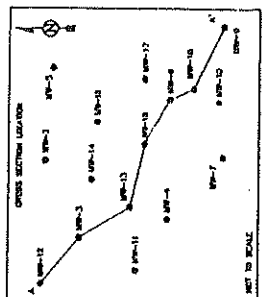
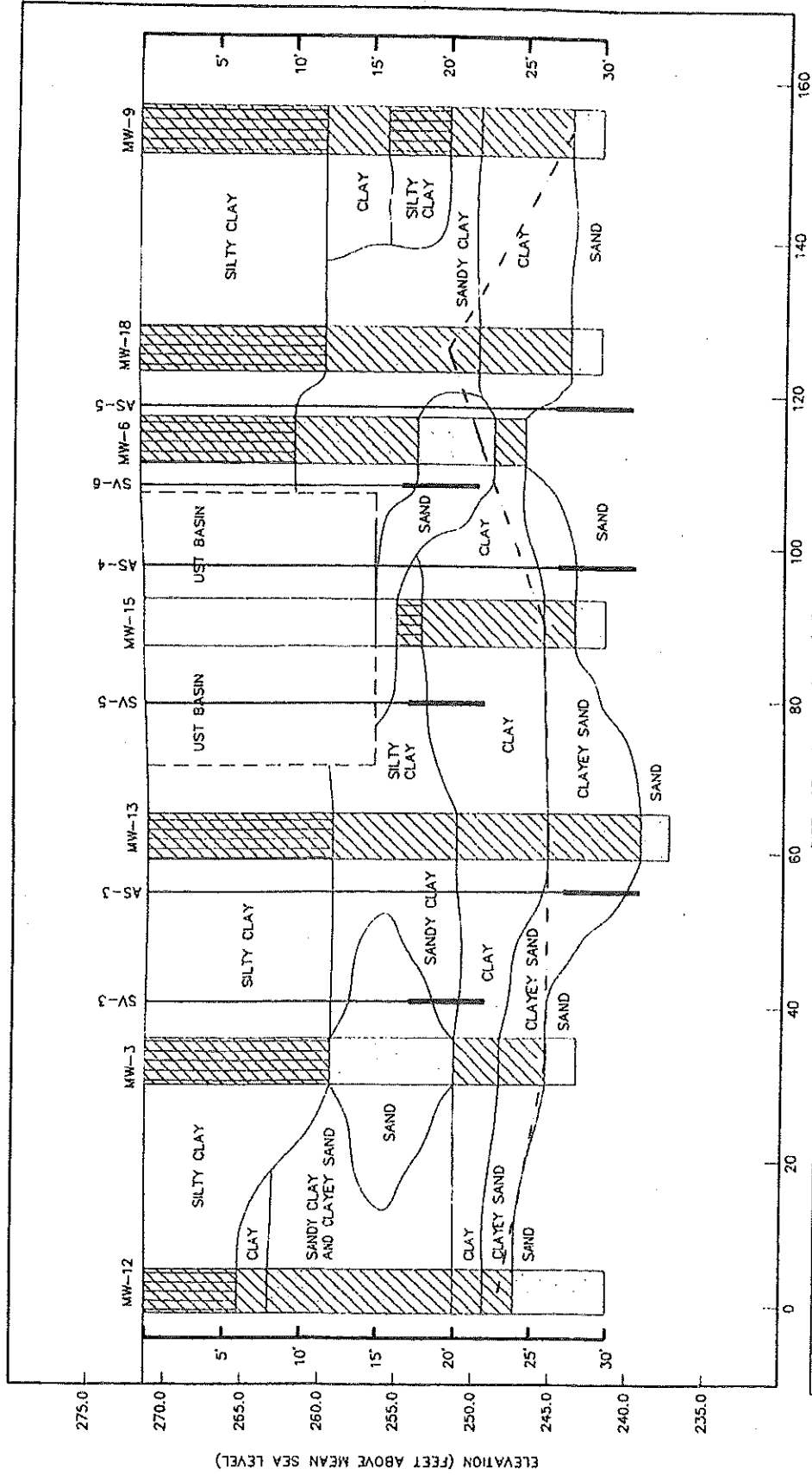



 <b>CIVIL ENGINEERING AND ENVIRONMENTAL SERVICES</b> 3512 South Shackleford Road Little Rock, Arkansas 72205 (501) 221-7122 fx (501) 221-7775	SUBMITTED: S. PATTERSON DRAWN: S. PATTERSON CHECKED: S. RASBURY DATE: MAY 6, 2022	FREE PRODUCT REMOVAL WORK PLAN JORDAN'S KWIK STOP #98, 101 WEST BROAD STREET LEPANTO, ARKANSAS 72354	GENERALIZED AS/YE PROCESS AND FLOW DIAGRAM	JOB NUMBER <b>EPCI-12631</b> DRAWING NUMBER <b>2</b>
	FILE: L:\ENVIRONMENTAL POLLUTION CONSULTANTS, INC\EPC-12631 - FREE PRODUCT REMOVAL - JORDAN'S KWIK STOP 439\WORK PLAN\ASVE DESIGN\DRAWINGS\DRAWING 2-ASVE P&F DIALING			

NORTHWEST

SOUTHEAST

A



 <b>PMI</b> CIVIL ENGINEERING AND ENVIRONMENTAL SERVICES 3512 South Shackleford Road Little Rock, Arkansas 72205 (501) 221-7122 fx (501) 221-7775	SUBMITTED: S. PATTERSON DRAWN: S. PATTERSON CHECKED: S. RASBURY DATE: APR. 25, 2022	FREE PRODUCT REMOVAL WORK PLAN JORDAN'S KWIK STOP #89 101 WEST BROAD STREET LEFANTO, ARKANSAS 72354	JOB NUMBER <b>EPCI-12631</b>
	CROSS SECTION A - A'		DRAWING NUMBER <b>4</b>

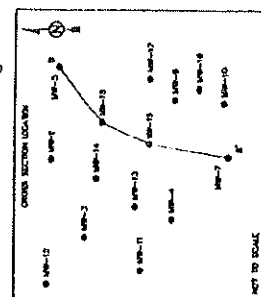
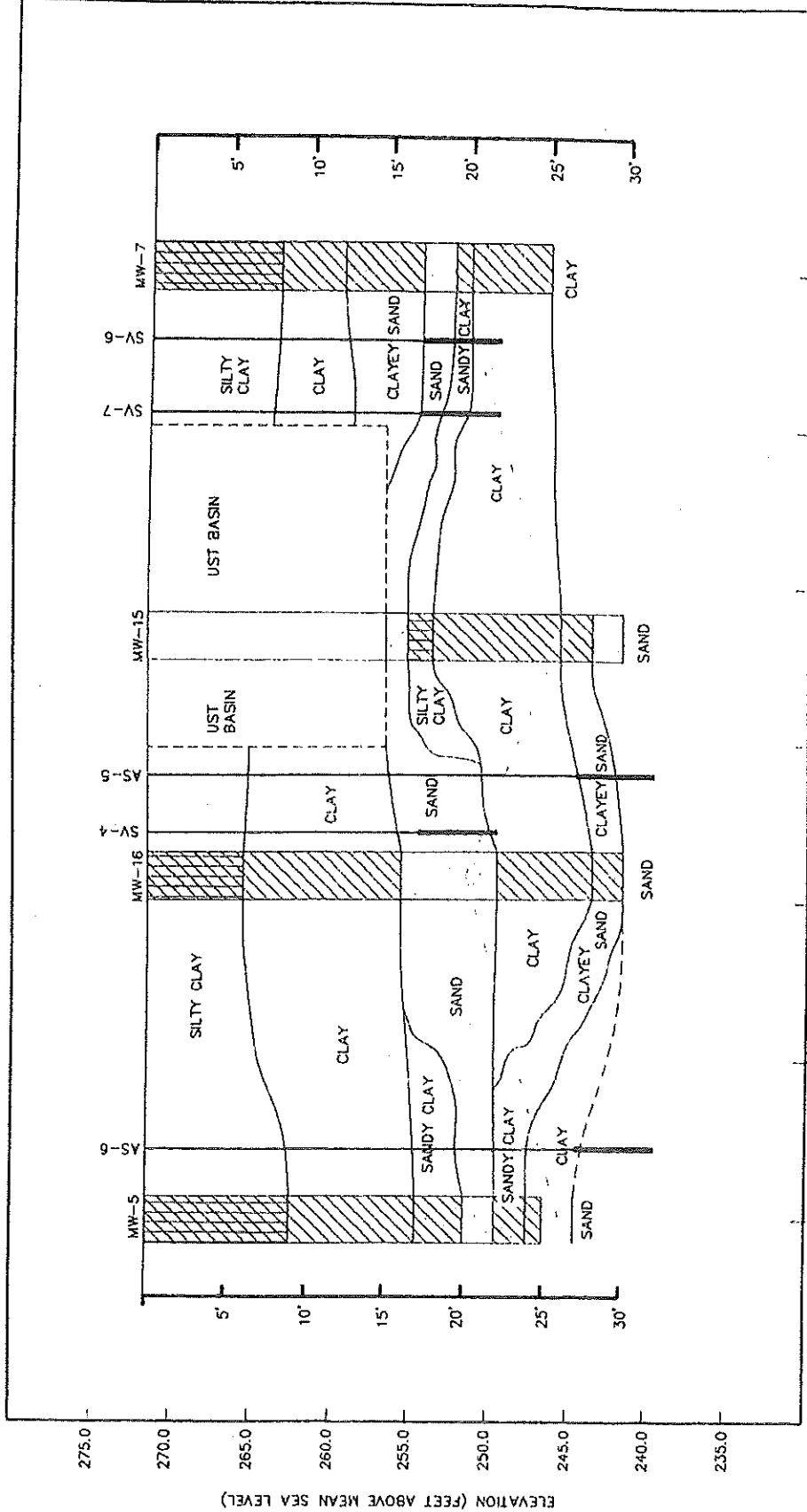
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NORTH

B

SOUTH

B'



 <b>CIVIL ENGINEERING AND ENVIRONMENTAL SERVICES</b> 3512 South Shackelford Road Little Rock, Arkansas 72205 (501) 221-7122 Fax (501) 221-7775	SUBMITTED: S. PATTERSON DRAWN: S. PATTERSON CHECKED: S. RASBERRY DATE: APR 25, 2022	FREE PRODUCT REMOVAL WORK PLAN JORDAN'S KWIK STOP #39 101 WEST BROAD STREET LEPANTO, ARKANSAS 72354	JOB NUMBER <b>EPCI-12631</b>
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**DIVISION OF  
ENVIRONMENTAL QUALITY**

Sarah Huckabee Sanders  
GOVERNOR

Shane E. Khoury  
SECRETARY

**MEMORANDUM OF REVIEW  
Reimbursement Request  
Petroleum Storage Tank Trust Fund**

From: Petroleum Storage Tank Trust Fund Staff

Date: May 29, 2024

Subject: **Former Valero Corner Store  
301 East Speedway  
Dermott, AR  
ID #09000027 LUST #09-0010 AFIN 09-00175**

A request for reimbursement #14 for costs incurred during remediation of an UST site was received from the Responsible Party (RP) on February 1, 2024. The RP of this site reported a gasoline release (#09-0010) on October 8, 2014, based on organic vapor readings and hydrocarbon odors in soil borings advanced around the tank hold, near the dispenser island. The name and the address of the RP:

**CST Arkansas Stations, LLC/Circle K  
Attn: Mike McKoy  
1100 Situs Court Suite 100  
Raleigh, NC 27606**

The period covered by this application is April 3, 2023 through June 29, 2023. Remediation activities for which reimbursement is requested include: implementation of an Additional Free Product Removal Work Plan, Change Order Requests #1 and #2, and preparation of Reimbursement Application #14.

According to PPM's latest monitoring report, during the time period 8/30/22 through 12/27/23, the refurbished DPE/AS system has recovered an estimated 830 vapor-equivalent gallons of petroleum. Run-time efficiency during the fourth quarter of 2023 is 70%.

This application includes one (1) invoice from PPM Consultants, Inc. (PPM) totaling **\$21,044.47**. Included in PPM's invoice are charges for PPM's direct labor charges.

The consultant and the RST Case Manager have each prepared a summary of activities. (See attachments).

**RECOMMENDATION:**

The claimed cost of \$21,044.47 was checked against documentation provided. **An adjustment of \$4.12 for an un-allowed FedEx charge is recommended.** Copies of the Cost Summary Sheet and all recap sheets provided by the RP are attached.

**The staff recommends payment as follows:**

<b>Claim filed- Form TF-1</b>	<b>\$21,044.47</b>
<b>Less: Deductible</b>	<b>- 00.00</b>
<b>Less: Adjustments</b>	<b>- <u>4.12</u></b>
<b>Total Net Claim</b>	<b><u>\$ 21,040.35</u></b>

It is recommended that the claim made by the RP be considered in the amount of **\$21,040.35**.

## Approved Work Plans

09000027 09-0010 VALERO CORNER STORE #1800

	<u>Date</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	05/07/2015	Revised Site Assessment Work Plan	Cardno ATC	\$43,257.58
02	08/25/2015	C.O. #1 to SAWP	Cardno ATC	\$1,275.00
03	01/05/2016	Interim Free Product Removal Work Plan	Cardno ATC	\$10,695.00
04	03/15/2016	Revised Add'l Site Assessment Work Plan	Cardno ATC	\$23,785.00
05	10/04/2016	Revised 2nd Add'l Site Assessment Work Plan	Cardno ATC	\$36,639.50
06	08/07/2017	Aquifer Test Work Plan	ATC Group Ser	\$36,013.30
07	10/15/2018	Revised Free Product Removal WP	ATC Group Ser	\$761,612.39
08	03/21/2019	C.O. #1 to the Free Product Removal WP	ATC	\$10,673.17
09	04/23/2019	C.O. #2 to the Free Product Removal WP	ATC	\$1,462.00
10	12/28/2021	Conditional Approval of AFPRWP	PPM	\$339,550.00
11	07/28/2022	Approval of CO #1-AFPRWP	PPM	\$32,122.93
12	01/20/2023	Approval of CO#2-AFPRWP	PPM	\$4,392.04
				<hr/> <hr/> <u>\$1,301,477.91</u>



# Approved Payments

09000027

090010

VALERO CORNER STORE #1800

<u>Date Approved</u>	<u>Amount</u>
3 /29/2016	\$34,526.76
1 /31/2017	\$31,342.46
3 /27/2018	\$33,028.75
6 /26/2019	\$63,337.62
1 /29/2020	\$55,204.61
12/2 /2020	\$276,377.68
7 /27/2022	\$15,097.04
12/7 /2022	\$457.59
1 /31/2024	\$64,308.42
1 /31/2024	\$109,702.44
1 /31/2024	\$93,330.54
1 /31/2024	\$95,821.90
1 /31/2024	\$66,858.01
1 /31/2024	\$24,739.86
	<hr/>
	<b>\$964,133.68</b>
	<hr/> <hr/>

APPLICATION FOR REIMBURSEMENT  
from the  
PETROLEUM STORAGE TANK TRUST FUND

(1) ADEQ Facility Identification Number: 09000027

(2) Responsible Party Information:

Company Name CST Arkansas Stations, LLC/Circle K

Contact Person Mike McKoy

Address 1100 Situs CT Suite 100

City and State Raleigh, NC

Zip Code 27606

Phone 928-800-1434

(3) Release Location

Facility Name Former Valero Corner Store #1800

Address 301 E. Speedway

City and State Dermott, AR

(4) Type of Tank (check only one):

Aboveground

Underground

(5) Type of Product Released:

Gasoline

Kerosene

Jet Fuel

Diesel

Heating Oil

Aviation Gas

Used Motor Oil

Other  (list) \_\_\_\_\_

Date of Release 10/8/2014

Release (LUST) Number 09-0010

Facility ID# 09000027  
Date 09/01/23

**CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I also certify that the amounts claimed for reimbursement under this application have been paid in full. I further certify that I have the authority to submit this application on behalf of

CST Arkansas Stations, LLC/Circle K

Mike McKoy

Type/Print name of Owner/Operator or Responsible Party

*Michael McKoy*

Signature of Owner/Operator or Responsible Party

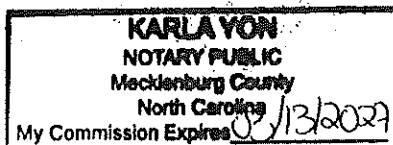
**ACKNOWLEDGEMENT**

Sworn to and subscribed before me this 1 day of September 2023

*Karla Yon*

Notary Public

My Commission Expires: <sup>KY</sup> 03/27 03/13/2027



**PROOF OF PAYMENT AFFIDAVIT**

I, Shawn Ivey being of sound mind, am responsible to ensure this application is completed per regulatory requirements. I have personal knowledge of the contents of this document; all of which are true and correct to the best of my knowledge. Furthermore, as Principal of PPM Consultants Inc., I certify that, as of this date, PPM Consultants Inc. has been paid in full by CST Ark. Stations, LLC/Circle K for the invoices contained in this reimbursement request:

Invoice Number	Invoice Date	Invoice Amount
97042	6/30/2023	\$21,044.47
Total		\$21,044.47

Signed this 21 day of September, 2023

Shawn Ivey  
Shawn Ivey

**ACKNOWLEDGEMENT**

Sworn to and subscribed before me this 21 day of September, 2023.

Leslie C Kramel  
Notary Public

My Commission Expires: Upon Death



LESLIE C KRAMEL  
Notary Public  
Notary ID No. 052156  
OUACHITA PARISH

Interim Request No.	14	<b>COST SUMMARY SHEET</b>			
Consultant /Responsible Party:		PPM Consultants Inc. / CST Arkansas Stations, LLC/Circle K			
Facility Identification #:		09000027	Facility Name: Former Valero Corner Store No. 1800		
Dates current costs incurred:	From	04/03/23	to	06/29/23	Request Date: 09/01/23
COST SUMMARY					
<b>1. DIRECT LABOR COST (attach labor recap)</b>		Hours	Actual Cost		
Principal/Managerial		22.25	\$1,088.20		
Professional/Technical		159.00	\$4,267.00		
Support		9.00	\$162.66		
<b>Totals</b>		<b>190.25</b>	<b>\$5,517.86</b>		
Total Actual Labor Costs x 3					<b>\$16,553.57</b>
<b>2. FIXED RATE COSTS (List by category - attach recap)</b>				Actual Cost	
Equipment Rental				\$0.00	
Per Diem (meals only, with documented overnight stay)				\$0.00	
Mileage				\$2,015.30	
Other				\$0.00	
<b>Total Fixed Rate Costs</b>					<b>\$2,015.30</b>
<b>3. OTHER DIRECT COSTS (List by category - attach recap)</b>				Actual Cost	
Lodging				\$0.00	
Laboratory				\$0.00	
Subcontracts				\$850.00	
Supplies				\$0.00	
Other				\$796.26	
<b>Total Other Direct Costs</b>					<b>\$1,646.26</b>
4. Reimbursement Preparation Cost for RA#(s) <u>14</u>		(\$500 or \$1000)			\$500.00
<b>5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)</b>					<b>\$20,715.13</b>
6. Markup on Total Other Direct Costs (maximum 20%)					\$329.35
<b>7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)</b>					<b>\$21,044.47</b>
<b>A. Total Reimbursement Requested to Date Including Above:</b>					<b>\$576,003.29</b>
<b>B. Less Amount Deductible (\$25,000, \$15,000, or \$7,500)</b>					<b>\$7,500.00</b>
<b>C. Less Amount Previously Retained/Disallowed by RST:</b>					<b>\$13,262.74</b>
<b>D. Less Amount Previously Received (Reimbursed by ADEQ):</b>					<b>\$534,196.08</b>
<b>E. Amount of this Request (same as line 7 above unless it is the 1st</b>					<b>\$21,044.47</b>

RECEIVED BY  
 DATE  
 21,044.47



Consultant /Responsible Party: PPM Consultants Inc. / CST Arkansas Stations, LLC/Circle K

Facility Identification # 09000027 Facility Name: Former Valero Corner Store No. 1800

Dates costs incurred: From 04/03/23 to 06/29/23 Request date: 09/01/23

**DIRECT LABOR COST DETAIL**

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
<b>PROFESSIONAL/TECHNICAL:</b>						
04/04/23	97042	Mark Coates	CA-Field Obs. Support	4.00	\$23.80	\$95.20
04/12/23	97042	Mark Coates	CA-Field Obs. Support	4.00	\$23.80	\$95.20
04/25/23	97042	Mark Coates	CA-Field Obs. Support	4.00	\$23.80	\$95.20
05/02/23	97042	Mark Coates	CA-Field Obs. Support	2.00	\$23.80	\$47.60
05/10/23	97042	Mark Coates	CA-Field Obs. Support	4.00	\$23.80	\$95.20
05/31/23	97042	Mark Coates	CA-Field Obs. Support	4.00	\$23.80	\$95.20
06/06/23	97042	Mark Coates	CA-Field Obs. Support	4.00	\$23.80	\$95.20
06/21/23	97042	Mark Coates	CA-Field Obs. Support	4.00	\$23.80	\$95.20
06/28/23	97042	Mark Coates	CA-Field Obs. Support	4.00	\$23.80	\$95.20
05/24/23	97042	Clifton Nelson	CA-Field Obs. Support	5.00	\$25.12	\$125.60
05/24/23	97042	Thomas Pruitt	CA-Field Observation	5.00	\$18.32	\$91.60
05/24/23	97042	Clifton Nelson	CA-Field Prep	1.00	\$25.12	\$25.12
05/26/23	97042	Clifton Nelson	CA-Field Prep	0.50	\$25.12	\$12.56
04/11/23	97042	Brian Hicks	CA-Computer Draft	2.00	\$34.14	\$68.28
04/20/23	97042	Mark Howard	CA-O&M	5.00	\$31.84	\$159.20
05/18/23	97042	Mark Howard	CA-O&M	5.00	\$31.84	\$159.20
05/22/23	97042	Mark Howard	CA-O&M	5.00	\$31.84	\$159.20
06/14/23	97042	Mark Howard	CA-O&M	5.00	\$31.84	\$159.20
04/03/23	97042	Jonathan Roger	CA-Report Prep	3.00	\$41.58	\$124.74
06/27/23	97042	Jonathan Roger	CA-Report Prep	3.00	\$41.58	\$124.74
04/03/23	97042	Jordan Harper	CA-Report Prep	2.00	\$28.27	\$56.54
04/04/23	97042	Jordan Harper	CA-Report Prep	2.00	\$28.27	\$56.54
04/05/23	97042	Jordan Harper	CA-Report Prep	1.00	\$28.27	\$28.27
04/10/23	97042	Jordan Harper	CA-Report Prep	6.00	\$28.27	\$169.62
04/11/23	97042	Jordan Harper	CA-Report Prep	2.00	\$28.27	\$56.54
04/14/23	97042	Jordan Harper	CA-Report Prep	0.50	\$28.27	\$14.14
04/17/23	97042	Jordan Harper	CA-Report Prep	1.00	\$28.27	\$28.27
04/19/23	97042	Jordan Harper	CA-Report Prep	1.00	\$28.27	\$28.27
06/13/23	97042	Jordan Harper	CA-Report Prep	4.00	\$28.27	\$113.08
06/14/23	97042	Jordan Harper	CA-Report Prep	6.00	\$28.27	\$169.62
06/19/23	97042	Jordan Harper	CA-Report Prep	1.50	\$28.27	\$42.41
06/20/23	97042	Jordan Harper	CA-Report Prep	1.00	\$28.27	\$28.27

<b>ADDITIONAL PROF/TECH COSTS (from the Extra Direct Labor Page):</b>	57.50		\$1,456.80
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<b>TOTAL PROFESSIONAL/TECHNICAL COSTS:</b>	159.00		\$4,267.00
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# Invoice

June 30, 2023

Invoice No: 97042

Anthony Bell  
Circle K Stores Inc.  
1120 W. Warner Road  
Tempe, AZ 85284

Project Manager: Jared Saterfiel

Project: 134931 Former Valero Corner Store No. 1800, 301 E. Speedway, Dermott,  
AR - Release # 09-0010

Professional Services through June 30, 2023

Phase: CA Corrective Action

**Professional Personnel**

		Hours	Rate	Amount
<b>Data Entry</b>				
Environmental Analyst I				
McMorris, Mason	6/15/2023	3.00 ✓	36.00	108.00
Administrative Asst. II				
Scott, Sarah	4/7/2023	.25 ✓	48.03	12.01
Scott, Sarah	4/28/2023	.25 ✓	48.03	12.01
Scott, Sarah	5/3/2023	.25 ✓	48.03	12.01
Scott, Sarah	5/11/2023	.25 ✓	48.03	12.01
Scott, Sarah	5/25/2023	.25 ✓	48.03	12.01
Scott, Sarah	6/7/2023	.25 ✓	48.03	12.01
Scott, Sarah	6/28/2023	.25 ✓	48.03	12.01
Scott, Sarah	6/29/2023	.25 ✓	48.03	12.01
<b>Drafting</b>				
Sr. AutoCAD/Graphic Designer				
Prickett, Jay	6/15/2023	2.00 ✓	79.32	158.64
<b>Field Observation Support</b>				
Environmental Specialist IV				
Coates, Mark	4/4/2023	4.00 ✓	71.40	285.60
Coates, Mark	4/12/2023	4.00 ✓	71.40	285.60
Coates, Mark	4/25/2023	4.00 ✓	71.40	285.60
Coates, Mark	5/2/2023	2.00 ✓	71.40	142.80
Coates, Mark	5/10/2023	4.00 ✓	71.40	285.60
Coates, Mark	5/31/2023	4.00 ✓	71.40	285.60
Coates, Mark	6/6/2023	4.00 ✓	71.40	285.60
Coates, Mark	6/21/2023	4.00 ✓	71.40	285.60
Coates, Mark	6/28/2023	4.00 ✓	71.40	285.60
Sr. Toxicologists				
Nelson, Clifton	5/24/2023	5.00 ✓	75.36	376.80

Project	134931	Former Valero Corner Store No. 1800	Invoice	97042	
Field Observation					
Technician II					
	Pruitt, Thomas	5/24/2023	5.00 ✓	54.96	274.80
Field Preparation					
Sr. Toxicologists					
	Nelson, Clifton	5/24/2023	1.00 ✓	75.36	75.36
	Nelson, Clifton	5/26/2023	.50 ✓	75.36	37.68
CADD/Computer Drafting					
Sr. AutoCAD/Graphic Designer					
	Hicks, Brian	4/11/2023	2.00 ✓	102.42	204.84
Operations & Maintenance					
Sr. Geologist					
	Howard, Mark	4/20/2023	5.00 ✓	95.52	477.60
	Howard, Mark	5/18/2023	5.00 ✓	95.52	477.60
	Howard, Mark	5/22/2023	5.00 ✓	95.52	477.60
	Howard, Mark	6/14/2023	5.00 ✓	95.52	477.60
Other					
Sr. Project Director					
	Thompson, Michael	5/23/2023	1.00 ✓	124.74	124.74
	IPAD setup / GW Labels				
Project Coordination					
	Sampognaro, Christopher	6/1/2023	1.00 ✓	186.68	186.68
Sr. Project Director					
	Thompson, Michael	5/24/2023	1.00 ✓	124.74	124.74
Project Management					
	Saterfiel, Jared	4/4/2023	1.00 ✓	151.44	151.44
	Saterfiel, Jared	4/19/2023	2.00 ✓	151.44	302.88
	Saterfiel, Jared	5/22/2023	1.00 ✓	151.44	151.44
	Saterfiel, Jared	5/24/2023	2.00 ✓	151.44	302.88
	Saterfiel, Jared	6/6/2023	1.50 ✓	151.44	227.16
	Saterfiel, Jared	6/28/2023	5.00 ✓	151.44	757.20
Quality Assurance/Quality Control					
Sr. Project Director					
	Thompson, Michael	4/4/2023	.75 ✓	124.74	93.56
	Thompson, Michael	4/12/2023	.25 ✓	124.74	31.19
	Thompson, Michael	4/20/2023	.25 ✓	124.74	31.19
	Thompson, Michael	4/25/2023	.25 ✓	124.74	31.19
	Thompson, Michael	5/10/2023	.25 ✓	124.74	31.19
	Thompson, Michael	5/18/2023	.25 ✓	124.74	31.19
	Thompson, Michael	5/22/2023	.50 ✓	124.74	62.37
	Thompson, Michael	5/31/2023	.25 ✓	124.74	31.19
	Thompson, Michael	6/6/2023	.25 ✓	124.74	31.19
	Thompson, Michael	6/21/2023	.25 ✓	124.74	31.19
Report Assembly					
Sr. Admin. Support					
	Montpelier, Terry	4/24/2023	.50 ✓	62.64	31.32
Report Preparation					
Sr. Project Director					
	Roger, Jonathan	4/3/2023	3.00 ✓	124.74	374.22
	Note entry				
	Roger, Jonathan	6/27/2023	3.00 ✓	124.74	374.22
	om NOTE ENTRY				

<b>Project Manager II</b>					
	Harper, Jordan	4/3/2023	2.00 ✓	84.81	169.62
	Harper, Jordan	4/4/2023	2.00 ✓	84.81	169.62
	Harper, Jordan	4/5/2023	1.00 ✓	84.81	84.81
	Harper, Jordan	4/10/2023	6.00 ✓	84.81	508.86
	Harper, Jordan	4/11/2023	2.00 ✓	84.81	169.62
	Harper, Jordan	4/14/2023	.50 ✓	84.81	42.41
	Harper, Jordan	4/17/2023	1.00 ✓	84.81	84.81
	Harper, Jordan	4/19/2023	1.00 ✓	84.81	84.81
	Harper, Jordan	6/13/2023	4.00 ✓	84.81	339.24
	Harper, Jordan	6/14/2023	6.00 ✓	84.81	508.86
	Harper, Jordan	6/19/2023	1.50 ✓	84.81	127.22
	quarterly monitoring report prep				
	Harper, Jordan	6/20/2023	1.00 ✓	84.81	84.81
<b>Sr. Admin. Support</b>					
	Montpelier, Terry	4/18/2023	1.00 ✓	62.64	62.64
	Montpelier, Terry	4/20/2023	.50 ✓	62.64	31.32
<b>Report Review</b>					
	Saterfiel, Jared	4/19/2023	2.50 ✓	151.44	378.60
	Saterfiel, Jared	4/27/2023	1.00 ✓	151.44	151.44
<b>Geologist V</b>					
	Emerson, Johnathan	4/17/2023	2.00 ✓	84.09	168.18
<b>Travel</b>					
<b>Environmental Specialist IV</b>					
	Coates, Mark	4/4/2023	4.00 ✓	71.40	285.60
	Coates, Mark	4/12/2023	4.00 ✓	71.40	285.60
	Coates, Mark	4/25/2023	4.00 ✓	71.40	285.60
	Coates, Mark	5/2/2023	3.50 ✓	71.40	249.90
	Coates, Mark	5/10/2023	4.00 ✓	71.40	285.60
	Coates, Mark	5/31/2023	4.00 ✓	71.40	285.60
	Coates, Mark	6/6/2023	4.00 ✓	71.40	285.60
	Coates, Mark	6/21/2023	4.00 ✓	71.40	285.60
	Coates, Mark	6/28/2023	4.00 ✓	71.40	285.60
<b>Sr. Geologist</b>					
	Howard, Mark	4/20/2023	3.00 ✓	95.52	286.56
	Howard, Mark	5/18/2023	3.00 ✓	95.52	286.56
	Howard, Mark	5/22/2023	3.00 ✓	95.52	286.56
	Howard, Mark	6/14/2023	3.00 ✓	95.52	286.56
<b>Technician II</b>					
	Pruitt, Thomas	5/24/2023	4.00 ✓	54.96	219.84
<b>Sr. Toxicologists</b>					
	Nelson, Clifton	5/24/2023	4.00 ✓	75.36	301.44
	<b>Totals</b>		190.25		16,553.66
	<b>Total Labor:</b>				<b>16,553.66</b>
<b>Subcontractors</b>					
	Laboratory				
	6/6/2023	Waypoint Analytical Mississippi			850.00 ✓
	<b>Total Subcontractors:</b>		1.2 times		850.00 ✓
					1,020.00 ✓
<b>Reimbursable Expenses</b>					
	Other Direct				
	4/1/2023	City of Dermott			65.25 ✓
	4/3/2023	MK Environmental, Inc.			125.00 ✓

Project	134931	Former Valero Corner Store No. 1800	Invoice	97042
5/1/2023	City of Dermott		72.25 ✓	
6/1/2023	City of Dermott		65.25 ✓	
6/23/2023	FarrWest Environmental Supply, Inc.		465.08 ✓	
Office Expenses				
6/15/2023	FedEx		3.43 ✓	
<b>Total Reimbursables:</b>		<b>1.2 times</b>	<b>796.26</b>	<b>955.51</b>

**Unit Billing**

Mileage - Company Vehicle

4/4/2023		/ 177.0 Miles @ 0.70	123.90	
4/12/2023		/ 180.0 Miles @ 0.70	126.00	
4/20/2023		/ 180.0 Miles @ 0.70	126.00	
4/25/2023		/ 175.0 Miles @ 0.70	122.50	
5/2/2023	ofc/site/ofc	/ 163.0 Miles @ 0.70	114.10	
5/10/2023		/ 174.0 Miles @ 0.70	121.80	
5/18/2023		/ 180.0 Miles @ 2.24	403.20	
5/22/2023		/ 185.0 Miles @ 0.70	129.50	
5/24/2023		/ 182.0 Miles @ 0.70	127.40	
5/31/2023		/ 175.0 Miles @ 0.70	122.50	
6/6/2023		/ 174.0 Miles @ 0.70	121.80	
6/14/2023		/ 184.0 Miles @ 0.70	128.80	
6/21/2023		/ 178.0 Miles @ 0.70	124.60	
6/28/2023		/ 176.0 Miles @ 0.70	123.20	
<b>Total Units:</b>			<b>2,015.30</b>	<b>2,015.30</b>

**Contract Maximum Billing Limits**

	Current	Prior	To-Date
Total Billings	20,544.47	88,996.46	109,540.93
Contract Maximum			322,533.04
Remaining			212,992.11
<b>Total this Phase:</b>			<b>\$20,544.47</b>

Phase: TFAP Trust Fund Application Preparation

**Fee**

Number of 500	500.00		
Fee Each	1.00		
Total Fee:	500.00		
Total Earned		500.00	
Previous Fee Billing		0.00	
Current Fee Billing		500.00	
<b>Total Fee:</b>			<b>500.00</b>

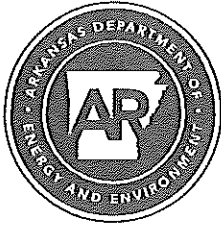
**Contract Maximum Billing Limits**

	Current	Prior	To-Date
Total Billings	500.00	2,000.00	2,500.00
Contract Maximum			3,000.00
Remaining			500.00
<b>Total this Phase:</b>			<b>\$500.00</b>

**Total this Invoice: \$21,044.47**

*All invoices are due upon receipt.*

*Please remit to PPM Consultants, Inc., 1600 Lamy Lane, Monroe, LA 71201*



# ARKANSAS ENERGY & ENVIRONMENT

## MEMORANDUM

**To:** *Matthew McShane 2/27/24*  
Jacqueline Trotta, Trust Fund Administrator  
Assessment & Remediation Program, Office of Land Resources

**Through:** Blake Whittle, P.G., Groundwater Branch Manager *BW 2/26/24*  
Joshua Stevens, P.G., Geologist Supervisor, Regulated Storage Tanks *JS*  
A & R Program, OLR

**From:** David Frazier, Professional Geologist *DF*  
RST, A & R Program, OLR

**Date:** February 21, 2024

**Subject:** Technical Review of Reimbursement Application #14  
For Time Period: 4/3/23 – 6/29/23  
Amount Requested: \$21,044.47  
[former] Valero Corner Store #1800 (CST Brands, Inc.)  
301 East Speedway St., Dermott, AR 71638  
LUST #09-0010 ID #09000027 AFIN: 09-00175

The following is in response to your memo to me dated 2/2/24.

### 1. Status of Release

- a) *At which step in the Subpart F process is the LUST case, i.e., Site Investigation, CAP, or FP Removal?*

Free product removal. On December 28, 2021 RST staff approved an *Additional Free Product Removal Work Plan*, developed and submitted by PPM Consultants Inc. (PPM). This work plan included repairs and a redesign of an existing, fixed dual-phase extraction and air sparge (DPE/AS) system. The DPE/AS system began operation on August 30, 2022. Treated groundwater is discharged into the City of Dermott's sanitary sewer.

Prior to PPM's involvement in this project, on behalf of the responsible party ATC Group Services LLC (ATC) installed the DPE system which became operational in May, 2019 and ceased operation in June, 2021. An installed air-sparge (AS) system was never put into service as approved. During the DPE system's operational life, many mechanical, technical and reporting problems were encountered without adequate resolution by ATC.



Following numerous “notices of deficiencies” issued by RST staff during ATC’s oversight of the project, effective July 1, 2021 the responsible party changed consultants to PPM.

- b) *If the remedy has been selected, what are the clean-up goals? Identify any issues that may delay progress or resolution of the case.*

An Exposure Assessment was completed on May 8, 2017. No completed human health or ecological exposure pathways were identified. However, it was determined that the source of regulated contamination must be controlled. The goal is to remove free product “to the maximum extent practicable” in accordance with 40 CFR § 280.64.

Under the approval of an *Additional Free Product Removal Work Plan*, a *System Start-up Report* was submitted by PPM on November 9, 2022. The first, second, third, fourth and fifth Operation & Monitoring (O&M) Reports were received on 2/7/23, 5/2/23, 8/3/23, 11/14/23, and 2/6/24, respectively.

As described in 1.a) above, clean-up was prolonged by as much as 2<sup>1/2</sup> years due to poor management practices by the previous consultant.

- c) *With the exception of investigation-derived wastes, if contaminated soil or ground water has been removed from the site, describe the quantity and type of contamination removed.*

Due to measurement and reporting deficiencies by ATC, estimation of hydrocarbon recovery from the fixed DPE system during the time period May, 2019 – June, 2021 is not possible.

According to PPM’s latest monitoring report, during the time period 8/30/22 through 12/27/23, the refurbished DPE/AS system has recovered an estimated 830 vapor-equivalent gallons of petroleum. Run-time efficiency during the fourth quarter of 2023 is reported at 70%.

## 2. Reimbursement Application

- a) *Briefly describe the activities for which reimbursement is requested and the specific work plan(s) or change order(s) (cost approvals) under which activities were authorized.*

The applicant is requesting reimbursement of costs incurred during partial implementation of an *Additional Free Product Removal Work Plan*, approved on December 28, 2021 and in Change Order Requests #1 and #2, approved on July 28, 2022 and January 20, 2023, respectively.

- b) *Identify any activity that may conflict with Rule 12 or that was not pre-approved by the technical staff.*

I did not identify any activity that was not approved or that conflicts with Rule 12.

- c) *If you do not agree with the consultant's project summary, state the areas of disagreement. If the consultant's summary is incomplete, or no summary is provided, give a brief history of the project to date.*

The applicant's Project Summary reasonably reflects my understanding of the case.

### 3. Maps & Graphs

- a) *If not provided by the consultant in the application, please attach site maps that identify the location of the site and the area of the release within the site.*

The applicant has provided site diagrams from *O&M Monitoring Report #4*.

- b) *Include any data and/or graphs that illustrate relevant environmental information in support of your summary.*

During the first two years of remediation (2019 – 2021), operational and mechanical deficiencies, along with poor management practices by the previous consultant have resulted in significant delays in the cleanup and an increase in project costs. Improper measurement practices by ATC during the early stages of remediation (when the highest recovery rates would be expected) have yielded a significant and permanent gap in our knowledge of total hydrocarbon recovery.

During contemporary remediation efforts by PPM (2022 – 2023), although run-time efficiency could be improved, there have been no significant operational problems since restarting the DPE/AS system in August, 2022. Free product has not been detected in monitoring wells and hydrocarbon recovery rates are continuing to fall; however, the engineered system continued to recover approximately **two vapor-equivalent gallons per day** during the month of December, 2023. For this reason, DEQ concurred with the consultant's recommendation to continue remediation operations, as approved.

On February 15, 2024, PPM informed RST staff that the blower motor for the AS system was in need of replacement. Staff requested that repairs be effected as soon as possible and to continue remediation as planned.

**PROJECT SUMMARY FOR  
TRUST FUND NARRATIVE  
REQUEST NO. 10**

**CIRCLE K STORES INC  
[FORMER] VALERO CORNER STORE  
#1800  
301 EAST SPEEDWAY  
DERMOTT, ARKANSAS  
CHICOT COUNTY**

**FACILITY ID NO. 09000027  
AFIN: 09-00175  
LUST NO. 09-0010**

**PPM PROJECT NO. 134931**

**FEBRUARY 12, 2024**

## 1.0 INTRODUCTION

PPM Consultants, Inc. (PPM) was retained by Circle K Stores Inc. to implement additional free product removal for the Former Valero Corner Store #1800 facility located at 301 East Speedway in Dermott, Chicot County, Arkansas as requested by Arkansas Department of Energy and Environment, Division of Environmental Quality (ADEQ). The purpose of the additional free product removal was to implement a plan for the recovery of regulated substance contamination to the maximum extent possible.

### 1.1 SITE DESCRIPTION

Geographically, the site is located in Section 32, Township 13 South, Range 3 West on the McGehee South, Arkansas Quadrangle at approximately Latitude 33° 31' 29" and Longitude 91° 25' 57". The site location is shown in **Figure 1, Site Location Map, in Appendix A, Figures.**

Structures present at the site include the former store building and remediation system. The surface area is covered mostly by concrete to the north of the structure with grassy areas along the eastern and southern boundaries. The former tank pit is located near the center of the property to the east of the former store building. Site features are shown in **Figure 2, Site Map, in Appendix A.**

## 2.0 BACKGROUND

Baseline assessment conducted by ATC Group Services (ATC), on October 1, 2014, included soil and groundwater sampling. Baseline assessment activities included the collection of soil samples from two borings near the dispenser island and two borings near the underground storage tank (UST) pit, along with the collection of one groundwater sample. Concentrations of benzene, xylenes, and total petroleum hydrocarbons – gasoline range organics (TPH-G) exceeded ADEQ reporting limits during baseline assessment sampling. A suspected release was reported by ATC on October 8, 2014. The ADEQ initiated leaking underground storage tank (LUST) Case #09-00710 on October 10, 2014. UST tank testing began on October 21, 2014, and was not able to identify any line leaks at that time.

The LUST case was assigned to Mr. Jarrod Zweifel of the RST Technical Branch on December 4, 2014. Mr. Zweifel conducted an initial site visit on January 6, 2015, and determined that a risk of potential impact to the City of Dermott water supply was unlikely; however vapor intrusion, due to the impacted soils, posed a potential risk for human health at the Valero store and nearby residence.



The ADEQ issued a letter requesting a Site Assessment Work Plan and Cost Estimate on January 27, 2015. ATC completed the Work Plan and Cost Estimate, and received ADEQ approval on April 1, 2015. ATC mobilized to the site to conduct site assessment activities on June 16, 2015. The site assessment included the installation of five soil borings/monitoring wells and the hand augering of one boring near the tank pit. Approximately 0.34 feet of free product gasoline was measured in MW-5 after well development. A change order request was issued by ATC on August 24, 2015, to subsequently gauge the onsite wells on a second site visit. The site gauging event was conducted on August 27, 2015, and ATC noted 1.45 feet of free product gasoline in MW-5. The Site Assessment Report was submitted to ADEQ by ATC on September 4, 2015.

ADEQ issued a request for an Additional Site Assessment Work Plan and Cost Estimate and Interim Free Product Removal Work Plan and Cost Estimate on November 18, 2015. ATC completed the Interim Free Product Removal Work Plan and Cost Estimate on January 5, 2016, and completed the Additional Site Assessment Work Plan and Cost Estimate on March 15, 2016. Interim Free Product Removal Activities included a single 8-hour mobile dual-phase extraction (MDPVE) event using a vacuum truck on January 20, 2016. During the MDPVE event approximately 47.87 gallons of free product were recovered from MW-5 and the free product detectable in the monitoring well was reduced from 4.34 feet to 0.09 feet. ATC mobilized to the site on April 5, 2016, to conduct Additional Site Assessment activities. During Site Assessment well gauging activities 4.14 feet of free product was identified in MW-1 and 4.93 feet in MW-5. The ADEQ case manager was notified of the additional free product in MW-1 on April 5, 2016, and the ADEQ case manager determined that the additional free product would be considered part of the ongoing LUST case on April 8, 2016. ATC submitted the Additional Site Assessment Report on May 26, 2016.

ADEQ issued a request for a Second Additional Site Assessment Work Plan on June 17, 2016. A Revised Second Additional Site Assessment Work Plan was submitted by ATC and Approved on October 4, 2016. ATC mobilized to the site for the Second Additional Site Assessment on February 14, 2017.

On January 4, 2017, the dispenser, product piping and three USTs were removed from the site at the direction of CST Brands, Inc. Damage was identified on the south end of the 8,000-gallon gasoline UST during visual inspection of the UST. Over excavation was implemented, including excavation to a depth of 9 feet below ground surface (BGS) along the product piping and 18 feet BGS in the UST pit. A Contractor's Permanent Closure Report was submitted to the ADEQ on January 23, 2017, following the UST removal event.

ADEQ issued a request for a Free Product Removal Work Plan and Cost Estimate on May 11, 2017. A scoping meeting was held between representatives for ATC and ADEQ on May 31, 2017. An aquifer test was requested prior to the development of a Free Product Work Plan in correspondence dated May 31, 2017. ATC installed Recovery Well RW-1 on September 12, 2017, conducted well gauging on November 6, 2017, and conducted aquifer tests between September 26, and September 28, 2017. ATC submitted an Aquifer Testing Report on November 6, 2017. A Revised Free Product Removal Work Plan was submitted by ATC on September 11, 2018. ADEQ approved the Revised Free Product Work Plan and Cost Estimate on October 15, 2018. ATC mobilized to the site on February 5, 2019, to initiate installation activities associated with the implementation of the Free Product Removal Plan. The installation activities included six recovery wells and four air sparge wells. System installation was completed on April 27, 2019. Baseline gauging and system startup was conducted between May 13, and May 17, 2019. The first Operations and Maintenance (O & M) was conducted on May 16, 2019. The first Quarterly Site Monitoring, O & M Report was submitted on September 30, 2019.

The eighth and final quarterly groundwater sampling event was conducted on June 14, 2021. The eighth and final effluent sample was collected on June 15, 2021. On June 22, 2021, ATC conducted the final O & M event, including gauging static groundwater levels, and recording system conditions, and cleaning system components. The Eighth Quarterly Site Monitoring, O & M Report was submitted by ATC on June 30, 2021.

ADEQ issued a request for Additional Free Product Removal Work Plan and Cost Estimate in a correspondence dated July 19, 2021. PPM Consultants, Inc. (PPM) was retained as the environmental response contractor by Circle K Stores Inc. on July 1, 2021. PPM requested an extension for the submittal of the Additional Free Product Removal Work Plan and Cost Estimate on September 5, 2021. PPM representatives met with ADEQ representatives for a scoping meeting on September 11, 2021. PPM submitted an Additional Free Product Removal Work Plan and Cost Estimate on November 17, 2021 to ADEQ for review. ADEQ requested revisions to the cost estimate in an email on November 22, 2021. PPM submitted a revised Additional Free Product Removal Work Plan and Cost Estimate on December 9, 2021 and ADEQ issued approval on December 28, 2021.

PPM initiated site upgrades and system startup activities on August 30, 2022. PPM prepared a Remediation System Installation and Startup Report discussing the system startup activities and first 60 days of system runtime. The Remediation System Startup Report was issued to ADEQ on November 3, 2022.



The 4<sup>th</sup> Quarter 2022 Operations and Maintenance/Monitoring Report covering the period from October through December 2022 was issued to ADEQ on January 30, 2023.

PPM prepared the Additional Free Product Removal Work Plan Change of Scope Request #1 on July 13, 2022 requesting a new compressor unit for the (Rietchle Rotary Claw blower 5 horse power, 3-phase, 230/460 volt/ TEFC motor) and a wireless monitoring system as part of the system startup operations.

PPM prepared Additional Free Product Removal Work Plan Change of Scope Request #2 requesting the purchase of 30 filtration bags, the purchase of descaling agent (MCT 5783), and the purchase of a metering pump. The second change of scope letter was issued on January 13, 2023.

### **3.0 RECENT ACTIVITIES**

#### **3.1 Continued Operation Activities and 3<sup>rd</sup> and 4<sup>th</sup> Quarter 2023 Groundwater Monitoring and Operations and Maintenance Reports**

Continued weekly Operations and Maintenance visits were conducted on July 5, July 12, July 19, July 25, August 2, August 9, August 16, August 23, September 1, September 6, September 13, September 21, September 27, October 4, October 12, October 16, October 24, October 31, November 7, November 13, November 22, November 28, December 7, December 11, December 20, and December 27, 2023.

During each O&M visit, the active recovery wells were checked for condition along with air and water flow status. Stinger depths for recovery wells were adjusted as needed. PPM collected flow rate information from the wells and adjusted the manifold as needed to manipulate the flow into the recovery system. If items were observed to be non-operational the cause was determined and troubleshooting or corrective action was taken. All onsite wells were gauged for groundwater elevation and free product thickness. Adjustments during this operation period included the altering of stinger depths in recovery wells and restarting the system following error shutdown. Influent vapor concentrations and flow velocity are measured at AWS prior to vapor treatment at the oxidizer using a calibrated FID. Vapor concentrations are measured at the air stripper exhaust stack to determine emission to site air. The air effluent discharged by the Multi-Phase Extraction (MPE) system is monitored by using a calibrated FID at several points to measure volatile hydrocarbon vapors. The measurements collected via FID were used to evaluate if the stinger depths were properly calibrated for maximum volatile organic compounds (VOC) recovery.

PPM collected system 3<sup>rd</sup> Quarter effluent DMR samples for TPH-G, BTEX during the routine September 13, 2023, O&M visit and collected 4<sup>th</sup> Quarter effluent DMR samples during the routine December 20, 2023, O&M visit.

The 1<sup>st</sup> Quarter 2023 groundwater sampling event was conducted on February 15, 2023. The 2<sup>nd</sup> Quarter 2023 groundwater sampling event was conducted on May 24, 2023. All groundwater wells were sampled and analyzed for BTEX and TPH-G constituents. No Free product (FP) was observed in monitoring wells during this reporting period.

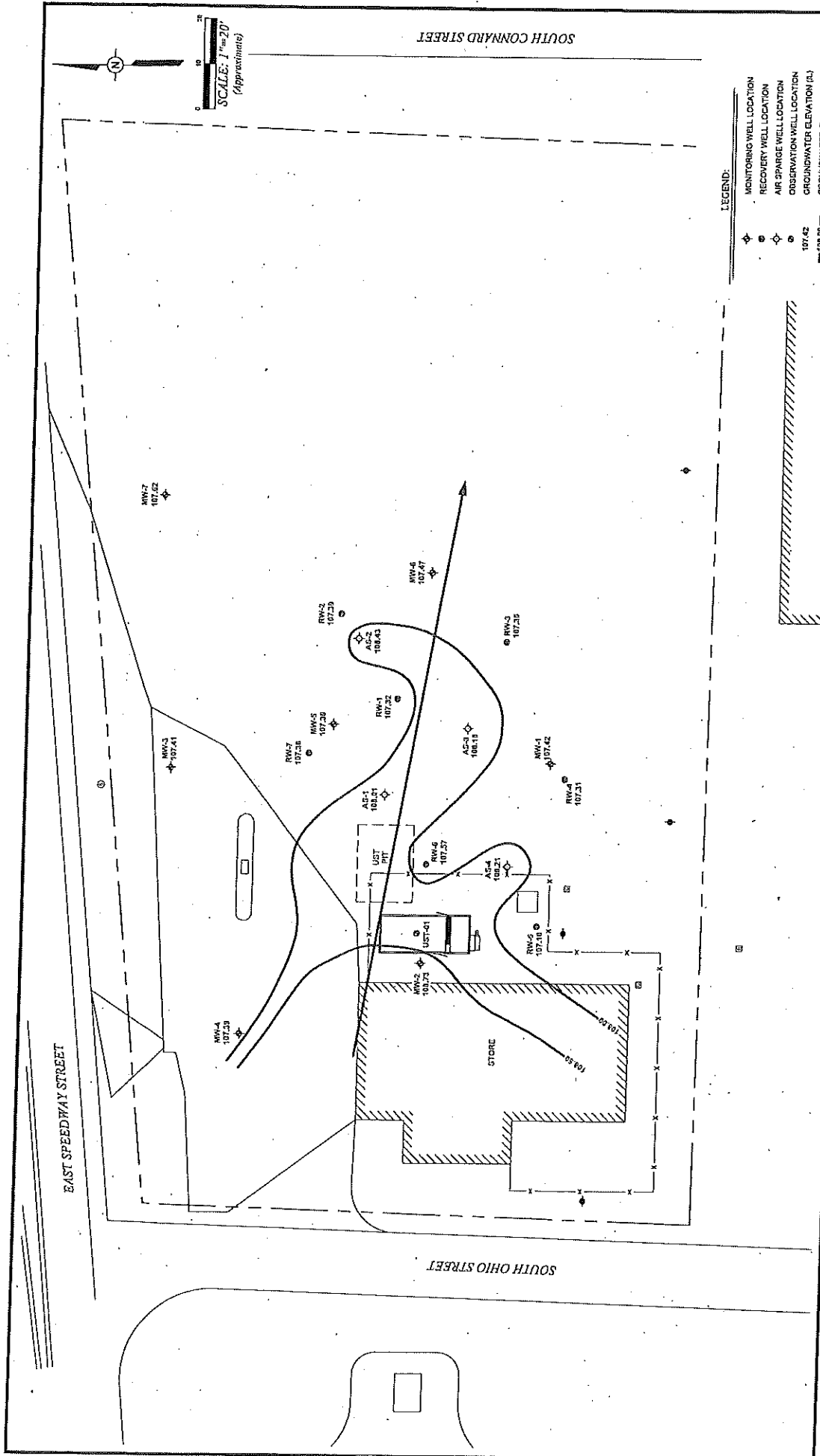
The 3<sup>rd</sup> Quarter 2023 Operations and Maintenance/Monitoring Report covering the period from July through September 2023 was issued to ADEQ on October 31, 2023. The 4<sup>th</sup> Quarter 2023 Operations and Maintenance/Monitoring Report covering the period from October through December 2023 was issued to ADEQ on January 31, 2024.

Based on groundwater gauging measurement collected during the 3<sup>rd</sup> and 4<sup>th</sup> Quarters groundwater monitoring event the groundwater flow direction was to the east-southeast and southwest respectively. The dissolved petroleum hydrocarbon plume appears to be adequately defined.

- Dissolved Benzene concentrations ranged from <0.001 milligrams per liter (mg/L) to 0.474 mg/L.
- Dissolved Toluene concentrations ranged from <0.002 mg/L to 0.142 mg/L.
- Dissolved Ethylbenzene concentrations ranged from <0.001 mg/L to 0.121 mg/L.
- Dissolved Xylenes concentrations ranged from <0.001 mg/L to 1.26 mg/L.
- Dissolved total petroleum hydrocarbons – gasoline range organics (TPH-G) concentrations ranged from <0.1 mg/L to 9.34 mg/L.





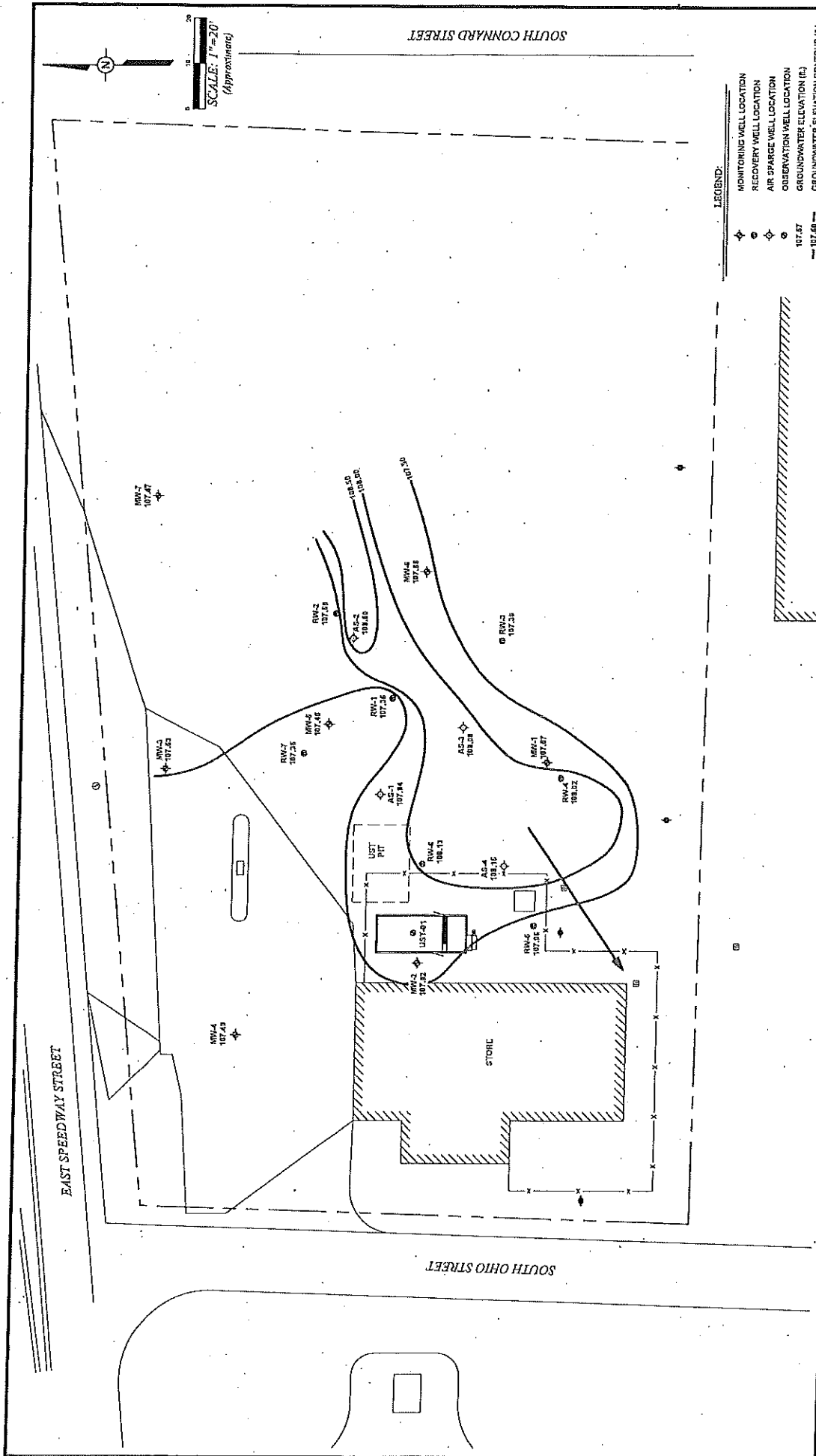


PFA CONSULTANTS, INC. <small>www.pfa.com</small>	
DRAWN BY: <b>BWH</b>	DRAWN DATE: <b>10/13/23</b>
PROJECT NUMBER: <b>134931</b>	PHASE: <b>RP</b>

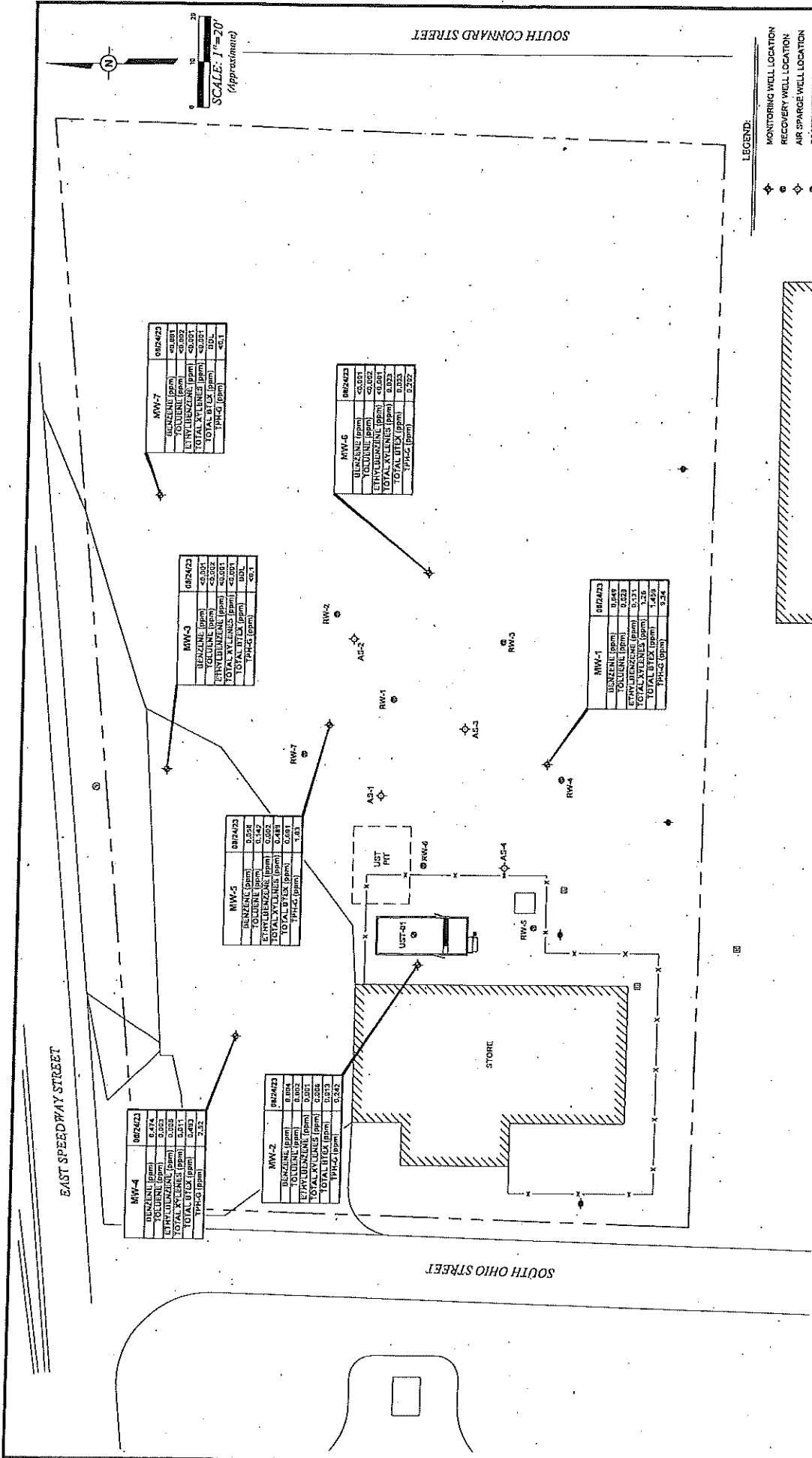
**CIRCLE K STORES, INC.**  
**FORMER VALEKO CORNER STORE NO. 1800**  
 307 EAST SPEEDWAY STREET  
 DERMOTT, ARKANSAS

**POTENTIOMETRIC SURFACE MAP**  
**3RD QUARTER 2023**  
 (AUGUST 24, 2023)

FIGURE NUMBER  
**2**



		<b>POTENTIOMETRIC SURFACE MAP</b> 4TH QUARTER 2023 (NOVEMBER 15, 2023)		FIGURE NUMBER <b>2</b>
<b>CIRCLE K STORES, INC.</b> FORMER VALERO CORNER STORE NO. 1800 301 EAST SPEEDWAY STREET DERMOTT, ARKANSAS				
DRAWN BY: <b>JCP</b>	DRAWN DATE: <b>01/09/24</b>	PROJECT NUMBER: <b>134931</b>	PHASE: <b>RP</b>	



**PPM** PPM CONSULTANTS, INC.  
www.ppmcorp.com

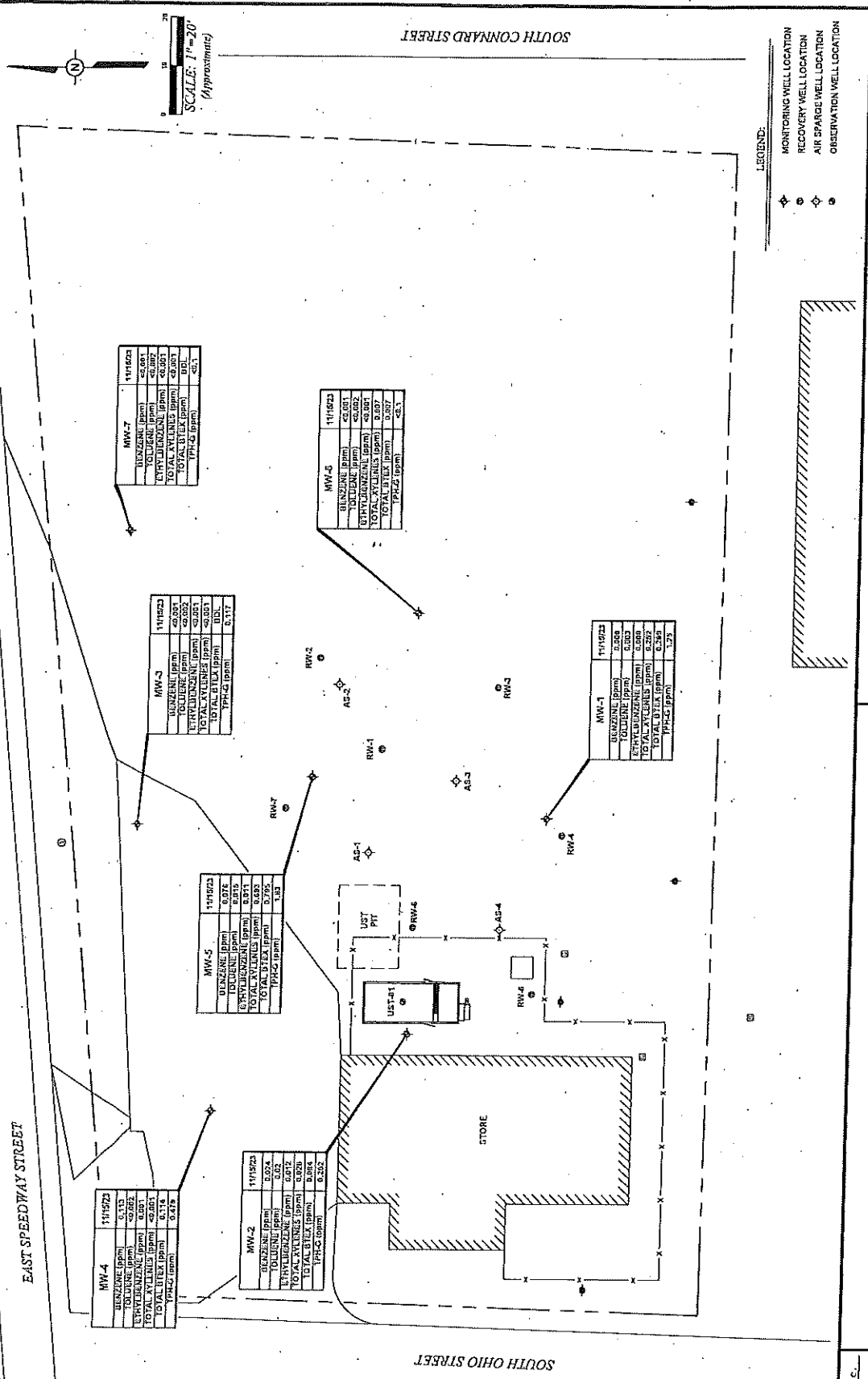
DRAWN BY: BWH  
 PROJECT NUMBER: 134931-  
 PHASE: RP

DATE: 10/13/23

**CIRCLE K STORES INC.**  
 FORMER VALERO CORNER STORE NO. 1800  
 301 EAST SPEEDWAY STREET  
 DERRICOTT, ARKANSAS

**DISSOLVED COC CONCENTRATIONS IN GROUNDWATER**  
 3RD QUARTER 2023  
 (AUGUST 24, 2023)

FIGURE NUMBER: 3



MW-7	
DATE	11/16/23
BENZENE (ppm)	<0.01
TOLUENE (ppm)	<0.01
ETHYLBENZENE (ppm)	<0.01
TOTAL XYLENES (ppm)	<0.01
TOTAL PHE (ppm)	<0.1

MW-5	
DATE	11/16/23
BENZENE (ppm)	<0.01
TOLUENE (ppm)	<0.01
ETHYLBENZENE (ppm)	<0.01
TOTAL XYLENES (ppm)	<0.01
TOTAL PHE (ppm)	<0.1

MW-3	
DATE	11/16/23
BENZENE (ppm)	<0.01
TOLUENE (ppm)	<0.01
ETHYLBENZENE (ppm)	<0.01
TOTAL XYLENES (ppm)	<0.01
TOTAL PHE (ppm)	<0.1

MW-1	
DATE	11/16/23
BENZENE (ppm)	0.008
TOLUENE (ppm)	0.008
ETHYLBENZENE (ppm)	0.008
TOTAL XYLENES (ppm)	0.297
TOTAL PHE (ppm)	0.284

MW-5	
DATE	11/16/23
BENZENE (ppm)	0.016
TOLUENE (ppm)	0.016
ETHYLBENZENE (ppm)	0.016
TOTAL XYLENES (ppm)	0.032
TOTAL PHE (ppm)	0.032

MW-4	
DATE	11/16/23
BENZENE (ppm)	0.113
TOLUENE (ppm)	<0.005
ETHYLBENZENE (ppm)	<0.01
TOTAL XYLENES (ppm)	0.114
TOTAL PHE (ppm)	0.478

MW-2	
DATE	11/16/23
BENZENE (ppm)	0.057
TOLUENE (ppm)	0.012
ETHYLBENZENE (ppm)	0.012
TOTAL XYLENES (ppm)	0.026
TOTAL PHE (ppm)	0.084

- LEGEND:
- ◆ MONITORING WELL LOCATION
  - ⊕ RECOVERY WELL LOCATION
  - ⊖ AIR SPARGE WELL LOCATION
  - OBSERVATION WELL LOCATION

DISSOLVED COC CONCENTRATIONS IN GROUNDWATER  
4TH QUARTER 2023  
(NOVEMBER 15, 2023)

CIRCLE K STORES, INC.  
FORMER VALERO CORNER STORE NO. 1800  
301 EAST SPEEDWAY STREET  
DENNITT, ARKANSAS

FBI CONSULTANTS, INC.	
DATE: 01/09/24	PROJECT NUMBER: 134931
DRAWN BY: JCP	PHASE: RP

FIGURE NUMBER  
**3**



# ARKANSAS

## ENERGY & ENVIRONMENT

### MEMORANDUM OF REVIEW Reimbursement Request Petroleum Storage Tank Trust Fund

From: Petroleum Storage Tank Trust Fund Staff

Date: May 29, 2024

Subject: **Dixon Road Exxon**  
**205 East Dixon Road**  
**Little Rock, AR**  
**ID #60001108 LUST #60-0935 AFIN 60-03421**

A request for reimbursement (#1) for costs incurred during remediation of an Underground Storage Tank (UST) site was received from the Responsible Party (RP) on February 26, 2024. The RP of this site reported a product release (#60-0935) on August 19, 2020, after free product was discovered in monitoring wells. The name and the address of the RP:

**Dixon Road Exxon**  
**Attn: Shama Khimani**  
**111 W. Dixon Road**  
**Little Rock, AR 72206**

The period covered by this application is July 28, 2021 through February 23, 2024. Remediation activities for which reimbursement is requested include: planning and full implementation of a Site Assessment Work Plan and Cost Estimate, Change Order #1, and preparation of Reimbursement Application #1.

No waste, other than Investigative Derived Waste, has been removed from this study site.

This application includes two (2) invoices from Snyder Environmental (Snyder) totaling **\$62,848.50**. Included in Snyder's invoices are charges from: Anderson Engineering (\$15,155.00), Arkansas Analytical (\$4,950.00), Arkansas Surveying & Consulting (\$3,500.00), Eco-Rental Solutions (\$2,317.70), and Waste Water Management (\$874.21).

The consultant and the RST Case Manager have each prepared a summary of activities. (See attachments).

**RECOMMENDATION:**

The claimed cost of **\$62,848.50** was checked against documentation provided. **An adjustment of \$28.40 for a bucket (tool of the trade) is recommended.** Copies of the Cost Summary Sheet and all recap sheets provided by the RP are attached.

**The staff recommends payment as follows:**

<b>Claim filed- Form TF-1</b>	<b>\$ 62,848.50</b>
<b>Less: Deductible</b>	<b>- 7,500.00</b>
<b>Less: Adjustments</b>	<b>- <u>28.40</u></b>
<b>Total Net Claim</b>	<b><u>\$ 55,321.10</u></b>

It is recommended that the claim made by the RP be considered in the amount of **\$55,321.10.**

60001108-01 LUST #60-0935 BG, JT

# Approved Work Plans

60001108 60-0935 DIXON ROAD EXXON

	<u>Date</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	07/01/2022	Conditional Approval of SAWP & C.E.	Snyder	\$58,935.58
02	01/12/2024	Change Order-1-SAWP & C.E.	Snyder	\$3,057.25
				<hr/>
				\$61,992.83
				<hr/> <hr/>



**APPLICATION FOR REIMBURSEMENT**  
from the  
**PETROLEUM STORAGE TANK TRUST FUND**

(1) ADEQ Facility Identification Number: 60001108

(2) Responsible Party Information:

Company Name Dixon Road Exxon

Contact Person Ms. Shama Khimani

Address 205 East Dixon Road

City and State Little Rock, AR

Zip Code 72206

Phone (501) 350-5039

(3) Release Location

Facility Name Dixon Road Exxon

Address 205 East Dixon Road

City and State Little Rock, AR

(4) Type of Tank (check only one):

Aboveground

Underground

(5) Type of Product Released:

Gasoline       Kerosene       Jet Fuel       Diesel       Heating Oil

Aviation Gas       Used Motor Oil       Other  (list) \_\_\_\_\_

Date of Release 8/19/2020      Release (LUST) Number 60-0935

Facility ID# 60001108

Date 02/23/24

**CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I also certify that the amounts claimed for reimbursement under this application have been paid in full. I further certify that I have the authority to submit this application on behalf of

SHAMA KHIMANI

Type/Print name of Owner/Operator or Responsible Party

*Shama Khimani*

Signature of Owner/Operator or Responsible Party

**ACKNOWLEDGEMENT**

Sworn to and subscribed before me this 23 day of February, 2024.

*Mandy Hodgett*  
Notary Public

My Commission Expires: 3/8/32





Interim Request No.	1	<b>COST SUMMARY SHEET</b>				
Consultant /Responsible Party: Snyder Environmental / Ms. Shama Khimani						
Facility Identification #: 60001108		Facility Name: Dixon Road Exxon				
Dates current costs incurred:	From	07/28/21	to	02/23/24	Request Date: 02/23/24	
<b>COST SUMMARY</b>						
<b>1. DIRECT LABOR COST (attach labor recap)</b>		<b>Hours</b>	<b>Actual Cost</b>			
Principal/Managerial		176.00	\$9,680.00			
Professional/Technical		0.00	\$0.00			
Support		5.00	\$150.00			
<b>Totals</b>		<b>181.00</b>	<b>\$9,830.00</b>			
Total Actual Labor Costs x 3					<b>\$29,490.00</b>	
<b>2. FIXED RATE COSTS (List by category - attach recap)</b>		<b>Actual Cost</b>				
Equipment Rental		\$0.00				
Per Diem (meals only, with documented overnight stay)		\$0.00				
Mileage		\$264.60				
Other		\$0.00				
<b>Total Fixed Rate Costs</b>					<b>\$264.60</b>	
<b>3. OTHER DIRECT COSTS (List by category - attach recap)</b>		<b>Actual Cost</b>				
Lodging		\$0.00				
Laboratory		\$4,950.00				
Subcontracts		\$19,529.21				
Supplies		\$85.52				
Other		\$2,317.70				
<b>Total Other Direct Costs</b>					<b>\$26,882.43</b>	
4. Reimbursement Preparation Cost for RA#(s) <u>1</u>		(\$500 or \$1000)		<b>\$1,000.00</b>		
<b>5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)</b>					<b>\$57,637.03</b>	
6. Markup on Total Other Direct Costs (maximum 20%)					<b>\$5,211.47</b>	
<b>7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)</b>					<b>\$62,848.50</b>	
A. Total Reimbursement Requested to Date Including Above:					<b>\$62,848.50</b>	
B. Less Amount Deductible (\$25,000, \$15,000, or \$7,500)					<b>\$7,500.00</b>	
C. Less Amount Previously Retained/Disallowed by RST:					<b>\$0.00</b>	
D. Less Amount Previously Received (Reimbursed by ADEQ):					<b>\$0.00</b>	
<b>E. Amount of this Request (same as line 7 above unless it is the 1st Request):</b>					<b>\$55,348.50</b>	

Consultant /Responsible Party: Snyder Environmental / Ms. Shama Khimani

Facility Identification # 60001108 Facility Name: Dixon Road Exxon

Dates costs incurred: From 07/28/21 to 02/23/24 Request date: 02/23/24

**DIRECT LABOR COST DETAIL**

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
<b>PRINCIPAL/MANAGERIAL:</b>						
07/28/21	LIT-I000928	T. Scott Kempf P.G.	Task 1	2.00	\$55.00	\$110.00
07/29/21	LIT-I000928	T. Scott Kempf P.G.	Task 1	6.00	\$55.00	\$330.00
11/19/21	LIT-I000928	T. Scott Kempf P.G.	Task 1	8.00	\$55.00	\$440.00
11/20/21	LIT-I000928	T. Scott Kempf P.G.	Task 1	8.00	\$55.00	\$440.00
08/08/22	LIT-I002749	T. Scott Kempf P.G.	Task 2	6.00	\$55.00	\$330.00
08/10/22	LIT-I002749	T. Scott Kempf P.G.	Task 2	6.00	\$55.00	\$330.00
08/15/22	LIT-I002749	T. Scott Kempf P.G.	Task 2	11.00	\$55.00	\$605.00
08/16/22	LIT-I002749	T. Scott Kempf P.G.	Task 2	13.00	\$55.00	\$715.00
08/17/22	LIT-I002749	T. Scott Kempf P.G.	Task 2	12.00	\$55.00	\$660.00
08/18/22	LIT-I002749	T. Scott Kempf P.G.	Task 2	12.00	\$55.00	\$660.00
08/19/22	LIT-I002749	T. Scott Kempf P.G.	Task 2, Task 4	11.00	\$55.00	\$605.00
08/24/22	LIT-I002749	T. Scott Kempf P.G.	Task 2	8.00	\$55.00	\$440.00
08/25/22	LIT-I002749	T. Scott Kempf P.G.	Task 2	6.00	\$55.00	\$330.00
08/26/22	LIT-I002749	T. Scott Kempf P.G.	Task 2, Task 3	9.00	\$55.00	\$495.00
05/25/23	LIT-I002749	T. Scott Kempf P.G.	Task 2	4.00	\$55.00	\$220.00
05/26/23	LIT-I002749	T. Scott Kempf P.G.	Task 2, Task 3	8.00	\$55.00	\$440.00
10/02/23	LIT-I002749	T. Scott Kempf P.G.	Task 5	4.00	\$55.00	\$220.00
10/03/23	LIT-I002749	T. Scott Kempf P.G.	Task 5	6.00	\$55.00	\$330.00
10/04/23	LIT-I002749	T. Scott Kempf P.G.	Task 5	3.00	\$55.00	\$165.00
10/09/24	LIT-I002749	T. Scott Kempf P.G.	Task 5	4.00	\$55.00	\$220.00
10/10/24	LIT-I002749	T. Scott Kempf P.G.	Task 5	6.00	\$55.00	\$330.00
10/16/23	LIT-I002749	T. Scott Kempf P.G.	Task 5	4.00	\$55.00	\$220.00
10/17/23	LIT-I002749	T. Scott Kempf P.G.	Task 5	6.00	\$55.00	\$330.00
10/18/23	LIT-I002749	T. Scott Kempf P.G.	Task 5	5.00	\$55.00	\$275.00
10/19/23	LIT-I002749	T. Scott Kempf P.G.	Task 5	5.00	\$55.00	\$275.00
10/20/23	LIT-I002749	T. Scott Kempf P.G.	Task 5	3.00	\$55.00	\$165.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00

**ADDITIONAL PRINC/MGR COSTS (from the Extra Direct Labor Page):**

**TOTAL PRINCIPAL/MANAGERIAL: 176.00 \$9,680.00**





























# Invoice

Date:

22-Feb-2024

Invoice #:

LIT-1002749

PO BOX 3317  
Little Rock, AR 72203

Phone: (501) 801-2776  
Web: [snyderenvironmental.com](http://snyderenvironmental.com)

### Bill To:

East Dixon Road Exxon  
3801 W. 65th Street  
Little Rock AR 72209  
Attn: Mr. Sadiq Ali

### Project Details:

2207AR328EC - Environmental Consulting - Workplan  
Development for LUST 60-0935 - East Dixon Road Exxon -  
205 E. Dixon Road, Little Rock, AR 72209

### Due Date

22-Feb-2024

### Payment Terms

Due on Receipt

### PO Number

### Contact Email

[billing@snyderenvironmental.com](mailto:billing@snyderenvironmental.com)

Item	Description	Quantity	UOM	Unit Price	Amount
Consulting	Perform Environmental Site Assessment for 205 E. Dixon Road Little Rock, AR , AE&E LUST 60-0935	1.00		58,850.00	58,850.00

Retainage	0.00
<b>Total this Invoice</b>	<b>58,850.00</b>
Payments/Credits	.00
<b>Balance Due</b>	<b>58,850.00</b>

### Domestic ACH and Wire Payments

Receiver Bank: Veritex Community Bank  
Receiver Bank Routing Transit/ABA Number: 113024164  
Receiver Bank Address: 17950 Preston Road, Suite 500, Dallas, Texas 7525

Beneficiary Name: Snyder Environmental & Construction, LLC  
Beneficiary Account #: 5501383003  
Beneficiary Address: 4028 Daley Ave., Ft. Worth, TX 76180

### Pay by Check

Snyder Environmental & Construction, LLC

Attn: Accounts Receivable  
PO BOX 3317  
Little Rock, AR 72203



# INVOICE

Date:  
11/30/2021

Invoice #:  
LIT-1000928

PO Box 3317  
Little Rock, AR 72203

## Bill To

East Dixon Road Exxon  
3801 W. 65th Street  
Little Rock AR 72209  
United States of America  
Attn: Mr. Sadiq Ali

Terms	Due Date	Project
Net 10	12/10/2021	LIT-000523

Item	Description	Amount
Consulting	Environmental Consulting - Workplan Development for LUST 60-0935 - East Dixon Road Exxon - 205 E. Dixon Road, Little Rock, AR 72209	3,998.50

We appreciate your prompt payment.  
Subject to a late payment penalty equal to 1% of the invoice.

NOTE:

Retainage	0.00
Total this Invoice	3,998.50
- Payments/Credits	.00
Balance Due	3,998.50

11.30.2021

Environmental Consulting as quoted for 2110AR251P1  
Project Manager, P.G.  
Heavy Duty Service Vehicle (Mile)

24 \$  
55 \$

165.00 \$  
0.70 \$

3,960.00  
38.50

TOTAL CHARGES

\$  
3,998.50

Ms. Shama Khimani  
 205 East Dixon Road  
 Little Rock, AR 72206  
 501-350-5039  
 e-mail:

LOCATION  
 Dixon Rd. Exxon  
 205 East Dixon Road  
 Little Rock, AR 72206  
 ADEQ Facility ID 60001108  
 LUST ID:60-0935  
 AFIN

ATTENTION Shama Khimani

Date	Item Description	Units	Unit Rate	Total
7/28/2021	Project Manager P.G. Project Planning, Task 1	2	\$ 165.00	\$ 330.00
7/29/2021	Project Manager P.G. Project Planning, Task 1	6	\$ 165.00	\$ 990.00
11/19/2021	Project Manager P.G. Project Planning, Task 1	8	\$ 165.00	\$ 1,320.00
11/20/2021	Project Manager P.G. Project Planning, Task 1	8	\$ 165.00	\$ 1,320.00
8/8/2022	Project Manager P.G. Office Time for Scheduling Field Work, Task 2	6	\$ 165.00	\$ 990.00
8/10/2022	Project Manager P.G. Office Time for Scheduling Field Work, Task 2	6	\$ 165.00	\$ 990.00
8/15/2022	Project Manager P.G. Site Visit for Well Drilling, Task 2	11	\$ 165.00	\$ 1,815.00
8/16/2022	Project Manager P.G. Site Visit for Well Drilling, Task 2	13	\$ 165.00	\$ 2,145.00
8/17/2022	Project Manager P.G. Site Visit for Well Drilling, Task 2	12	\$ 165.00	\$ 1,980.00
8/18/2022	Project Manager P.G. Site Visit for Well Drilling, Task 2	12	\$ 165.00	\$ 1,980.00
8/19/2022	Project Manager P.G. Site Visit for Well Drilling, Task 2 & Task 4	11	\$ 165.00	\$ 1,815.00
8/24/2022	Project Manager P.G. Site Visit for Flow Sampling, Task 2	8	\$ 165.00	\$ 1,320.00
8/25/2022	Project Manager P.G. Site Visit for Flow Sampling, Task 2	6	\$ 165.00	\$ 990.00
8/26/2022	Project Manager P.G. Sample Analysis, Task 2, Task 3	9	\$ 165.00	\$ 1,485.00
5/25/2023	Project Manager P.G. Site Visit for Flow Sampling, Task 2	4	\$ 165.00	\$ 660.00
5/26/2023	Project Manager P.G. Sample Analysis, Task 3	8	\$ 165.00	\$ 1,320.00
10/2/2023	Project Manager P.G. Site Assessment Prep, Task 5	4	\$ 165.00	\$ 660.00
10/3/2023	Project Manager P.G. Site Assessment Prep, Task 5	6	\$ 165.00	\$ 990.00
10/4/2023	Project Manager P.G. Site Assessment Prep, Task 5	3	\$ 165.00	\$ 495.00
10/9/2024	Project Manager P.G. Site Assessment Prep, Task 5	4	\$ 165.00	\$ 660.00
10/10/2024	Project Manager P.G. Site Assessment Prep, Task 5	6	\$ 165.00	\$ 990.00
10/16/2023	Project Manager P.G. Site Assessment Prep, Task 5	4	\$ 165.00	\$ 660.00
10/17/2023	Project Manager P.G. Site Assessment Prep, Task 5	6	\$ 165.00	\$ 990.00
10/18/2023	Project Manager P.G. Site Assessment Prep, Task 5	5	\$ 165.00	\$ 825.00
10/19/2023	Project Manager P.G. Site Assessment Prep, Task 5	5	\$ 165.00	\$ 825.00
10/20/2023	Project Manager P.G. Site Assessment Prep, Task 5	2	\$ 165.00	\$ 330.00
10/18/2023	Admin. Sandra Troost, Task 5	3	\$ 90.00	\$ 270.00
10/19/2023	Admin. Sandra Troost, Task 5	2	\$ 90.00	\$ 180.00
7/29/2021	Mileage, SEC-Client OFC-SEC, Task 1	22	\$ 0.70	\$ 15.40
11/20/2021	Mileage, SEC-Site-SEC, Task 1	30	\$ 0.70	\$ 21.00
8/15/2022	Mileage, SEC-Site-SEC, Task 2	22	\$ 0.70	\$ 15.40
8/15/2022	Mileage, SEC-ADEQ-SEC, Task 2	3	\$ 0.70	\$ 2.10
8/15/2022	Mileage, SEC-Site-SEC, Task 2	30	\$ 0.70	\$ 21.00
8/16/2022	Mileage, SEC-Site-SEC, Task 2	30	\$ 0.70	\$ 21.00
8/17/2022	Mileage, SEC-Site-SEC, Task 2	30	\$ 0.70	\$ 21.00
8/18/2022	Mileage, SEC-Site-SEC, Task 2	30	\$ 0.70	\$ 21.00
8/19/2022	Mileage, SEC-Site-SEC, Task 2	30	\$ 0.70	\$ 21.00
8/24/2022	Mileage, SEC-Site-SEC, Task 2	30	\$ 0.70	\$ 21.00
8/25/2022	Mileage, SEC-Site-SEC, Task 2	30	\$ 0.70	\$ 21.00
8/25/2022	Mileage, SEC-ADEQ-SEC, Task 2	3	\$ 0.70	\$ 2.10
8/26/2022	Mileage, SEC-Site-SEC, Task 2	30	\$ 0.70	\$ 21.00
5/25/2023	Mileage, SEC-Site-SEC, Task 2	30	\$ 0.70	\$ 21.00
5/25/2023	Mileage, SEC-ADEQ-SEC, Task 2	3	\$ 0.70	\$ 2.10
5/26/2023	Mileage, SEC-Client OFC-SEC, Task 2	22	\$ 0.70	\$ 15.40
10/20/2023	Mileage, SEC-ADEQ-SEC, Task 5	3	\$ 0.70	\$ 2.10
2/20/2024	Reimbursement Preparation Cost	1	\$ 1,000.00	\$ 1,000.00

**THIRD PARTY EXPENSES**

Date	Item Description	Units	Unit Rate	Total
9/27/2023	Arkansas Surveying & Consulting, Land & Topographic Survey, Task 2	1	\$ 4,200.00	\$ 4,200.00
6/23/2023	Arkansas Analytical, Task 2	1	\$ 1,296.00	\$ 1,296.00
5/26/2023	Waste Water Specialties, Waste Disposal, Task 2	1	\$ 5.10	\$ 5.10
5/22/2023	Eco-Rental Solutions Sampling Equipment, Task 2	1	\$ 1,368.80	\$ 1,368.80
8/31/2022	Waste Water Specialties, Waste Disposal, Task 2	1	\$ 31.70	\$ 31.70
8/26/2022	Dixon Road Exxon, Ice, Task 2	1	\$ 6.90	\$ 6.90
8/25/2022	Kroger, Ice, Task 2	1	\$ 4.90	\$ 4.90
8/25/2022	Lowe's, Misc. Consumables, Task 2	1	\$ 28.40	\$ 28.40
8/24/2022	Dixon Road Exxon, Ice, Task 2	1	\$ 6.90	\$ 6.90
8/19/2022	Eco-Rental Solutions Sampling Equipment, Task 2	1	\$ 1,412.40	\$ 1,412.40
8/19/2022	Anderson Engineering Consultants, Inc., Drilling Company, Task 2	1	\$ 18,186.00	\$ 18,186.00
8/19/2022	Waste Management, Waste Disposal, Task 2	1	\$ 139.10	\$ 139.10
8/16/2022	Arkansas Analytical, Task 2	1	\$ 4,644.00	\$ 4,644.00
8/16/2022	Lowe's, Misc. Consumables, Task 2	1	\$ 48.60	\$ 48.60
8/16/2022	Dixon Road Exxon, Ice, Task 2	1	\$ 6.90	\$ 6.90
8/15/2022	Waste Water Specialties 40yr Roll Off, Task 2	1	\$ 873.20	\$ 873.20

INVOICE TOTAL \$ 62,848.50



# ARKANSAS ENERGY & ENVIRONMENT

## MEMORANDUM

**To:** *Bridgett Green 4/17/24*  
Jacqueline Trotta, Trust Fund Administrator  
Assessment & Remediation Program, Office of Land Resources

**Through:** Blake Whittle, P.G., Groundwater Branch Manager *BW 4/17/24*  
A & R Program, OLR

**From:** Joshua Stevens, P.G., Geologist Supervisor *JS*  
Regulated Storage Tanks - A & R Program, OLR

**Date:** April 17, 2024

**Subject:** Technical Review of Reimbursement Application #1  
For Time Period:  
Amount Requested: \$55,348.50  
Dixon Road Exxon  
205 E Dixon Road  
Little Rock, AR 72206  
LUST #60-0935      ID #60001108      AFIN #60-03421

The following is in response to your memo to me dated March 1, 2024.

### 1. Status of Release

- a) *At which step in the Subpart F process is the LUST case, i.e., Site Investigation, CAP, or FP Removal?*

The referenced LUST case is in the Site Investigation part of Subpart F.

- b) *If the remedy has been selected, what are the clean-up goals? Identify any issues that may delay progress or resolution of the case.*

The Site Assessment Report identified free product in need of recovery. A request for an appropriate work plan and additional site assessment is being drafted.

- c) *With the exception of investigation-derived wastes, if contaminated soil or ground water has been removed from the site, describe the quantity and type of contamination removed.*

No waste other than Investigative Derived Waste has been removed from the study site.

## 2. Reimbursement Application

- a) *Briefly describe the activities for which reimbursement is requested and the specific work plan(s) or change order(s) (cost approvals) under which activities were authorized.*

Reimbursement Application #1 (RA #1) concerns activities related to:

- The planning and full implementation of a Site Assessment Work Plan and Cost Estimate, conditionally approved July 1, 2022.
- Change Order #1, approved January 12, 2024.
- The preparation of RA #1

- b) *Identify any activity that may conflict with Reg. 12 or that was not pre-approved by the technical staff.*

I have not identified any activity which conflicts with Reg. 12 or which was not pre-approved by technical staff.

- c) *If you do not agree with the consultant's project summary, state the areas of disagreement. If the consultant's summary is incomplete, or no summary is provided, give a brief history of the project to date.*

The consultant's project summary reasonably agrees with my understanding of the case.

## 3. Maps & Graphs

- a) *If not provided by the consultant in the application, please attach site maps that identify the location of the site and the area of the release within the site.*

The consultant has provided maps from the Site Assessment Report depicting contamination in soils and groundwater.

- b) *Include any data and/or graphs that illustrate relevant environmental information in support of your summary.*

I have no further comments at this time.



RECEIVED

RECEIVED

FEB 26 2024

FEB 23 2024

DEQ - RST

ST 1:55pm

To: Arkansas Energy and Environment and (AE&E) Office of Land Resources (OLR), Assessment & Remediation Program Regulated Storage Tanks (RST)

Attention: Ms. Jacqueline Trotta, CPM, Trust Fund Administrator

60001108

Project Summary: Dixon Road Exxon (Facility 60001108 AFIN 60-03421) AE&E RST LUST 60-0935, 205 East Dixon Road Little Rock, Arkansas 72206

Afin 60-03421

Lust 60-0935

Re: Trust Fund Reimbursement Application #1, July 28, 2021, through February 23, 2024

Claim Amount \$ 62,848.50

Snyder Environmental Construction, LLC (SEC) on behalf of the Responsible Party, Ms. Shama Khimani, is pleased to submit Trust Fund Reimbursement Application #1 for ADEQ LUST 60-0935. This reimbursement application includes two (2) invoices for costs incurred in preparing a Site Assessment Workplan and Cost Estimate approved by AE&E OLR RST on November 22, 2021, and the implementation of the Site Assessment workplan.

Implementation of the approved workplan included the installation of ten (10) groundwater monitoring wells at strategic locations to confirm the lateral extent of contaminant distribution in the subsurface at the facility and the collection of a surface water sample. Figure 3 attached to this memorandum is the Site Plan depicting the locations of the soil surface and groundwater data points. Figure 5 is a summary of soils chemical analysis and Figure 6 is a summary of surface and ground water chemical analysis.

On behalf of the Responsible Party, thank you for your expeditious processing of the attachment Reimbursement Application. Should you have any questions or concerns with this reimbursement package or the LUST case 60-0935 or the LUST case in general, please feel free to contact me at 512-648-2119 (direct) or 501-350-8102 (cell) or via email at skemph@snyderenvironmental.com.

Respectfully Submitted,

T. Scott Kempf

T. Scott Kempf, P.G. Vice President of Environmental Consulting Snyder Environmental Construction, LLC

Attachments: Figure 3, Site Plan

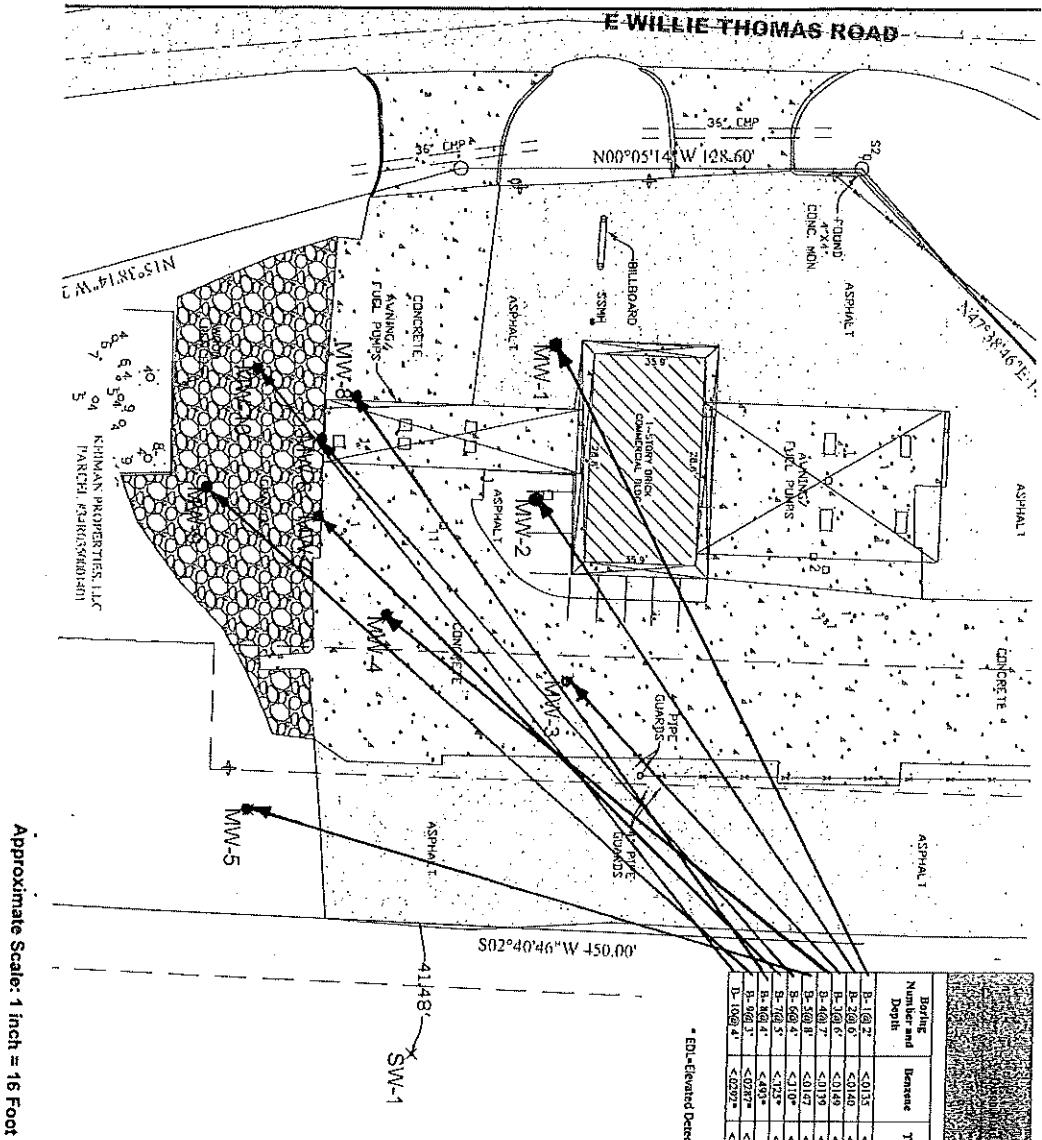
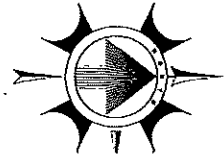
Figure 5 Summary of Soils Chemical Analysis \

Figure 6 Summary of Surface and Groundwater chemical analysis.

Reimbursement Application #1 for ADEQ LUST 60-0935 with W-9







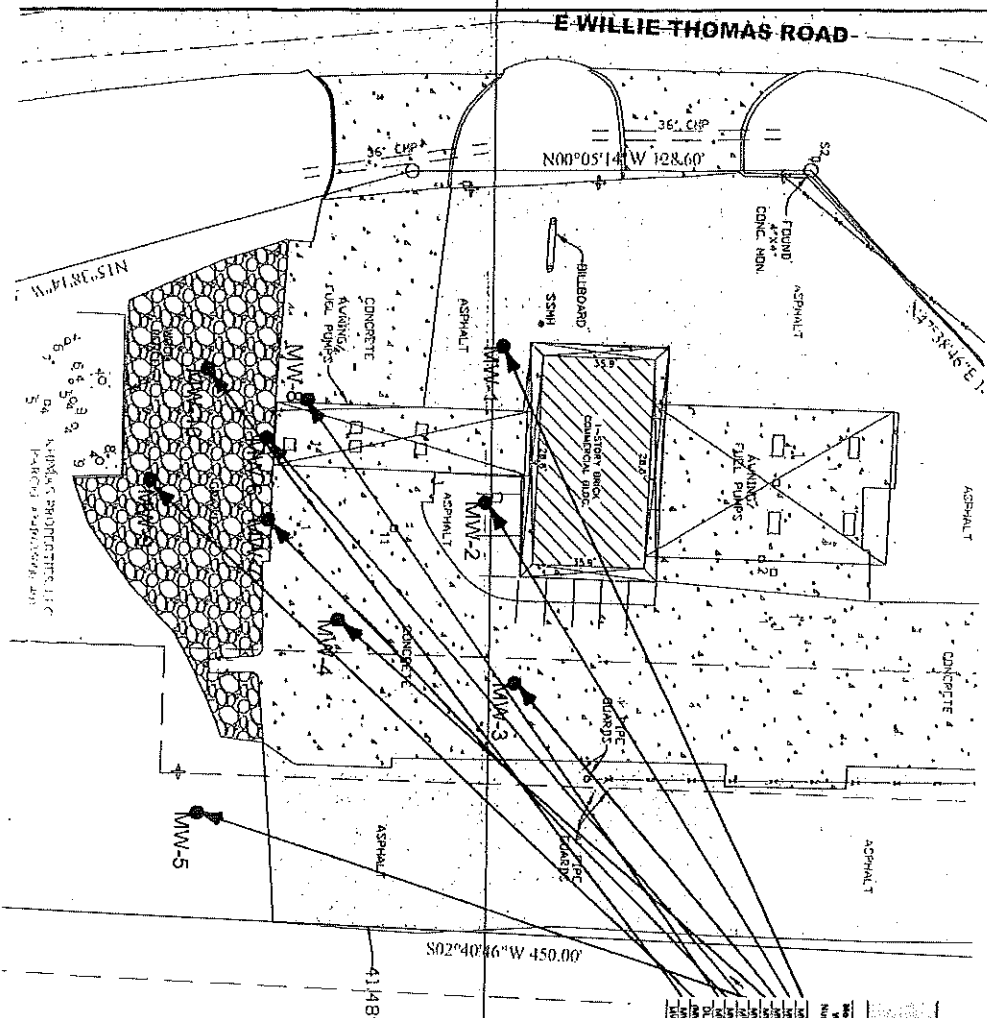
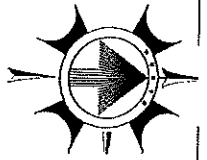
Monitoring Well	Borehole Number and Depth	Benzene	Toluene	Ethyl Benzene	Total p-Xylene	O-Xylene	DRO	GRO	Naphthalene	MTHIE
B-102-2	<0.15	<0.135	<0.115	<0.115	<0.115	<0.115	1.04	<0.115	<0.115	<0.115
B-106-0	<0.140	<0.140	<0.140	<0.140	<0.140	<0.140	<2.00	<2.00	<0.140	<0.140
B-106-7	<0.119	<0.109	<0.109	<0.109	<0.109	<0.109	<2.00	<2.00	<0.109	<0.109
B-108-7	<0.119	<0.119	<0.119	<0.119	<0.119	<0.119	<2.00	<2.00	<0.119	<0.119
B-108-8	<0.107	<0.147	<0.147	<0.147	<0.147	<0.147	<2.00	<2.00	<0.147	<0.147
B-108-4	<0.10*	<0.10*	<0.10*	<0.10*	<0.10*	<0.10*	1.86	<0.10*	<0.10*	<0.10*
B-108-1	<0.125*	<0.125*	<0.125*	<0.125*	<0.125*	<0.125*	7.68	<0.125*	<0.125*	<0.125*
B-108-11	<0.125*	<0.125*	<0.125*	<0.125*	<0.125*	<0.125*	4.92	<0.125*	<0.125*	<0.125*
B-108-11	<0.125*	<0.125*	<0.125*	<0.125*	<0.125*	<0.125*	3.57	<0.125*	<0.125*	<0.125*
B-108-4	<0.092*	<0.092*	<0.092*	<0.092*	<0.092*	<0.092*	6.43	<0.092*	<0.092*	<0.092*

\* ED - Elevated Detection Limit due to necessary sample dilution

**Figure 5**

**Summary of Chemical Analysis for Soil**

Dixon Road Exxon (Facility ID 60001108 A/FIN 60-03421)  
 AE&E RST LUST 60-0935  
 205 East Dixon Road  
 Little Rock, Arkansas 72206



Approximate Scale: 1 inch = 16 Foot

**Summary of Chemical Analysis for Groundwater**  
**Dixon Road Exon (Facility ID 60001108 AFIN 60-03421)**  
 Little Rock, Arkansas 72206  
 All results reported in µg/L

Sample Number	Volume	E. Benzene	Total n-PAHs	OHF	OHF	1,2,4-Trimethylbenzene	1,2,4-Trimethylbenzene
MW-1	41.00	<1.00	<1.00	1.71	<1.00	<1.00	<1.00
MW-2	41.00	<1.00	<1.00	1.71	<1.00	<1.00	<1.00
MW-3	41.00	<1.00	<1.00	1.71	<1.00	<1.00	<1.00
MW-4	41.00	<1.00	<1.00	1.71	<1.00	<1.00	<1.00
MW-5	41.00	<1.00	<1.00	1.71	<1.00	<1.00	<1.00
SW-1	41.00	<1.00	<1.00	1.71	<1.00	<1.00	<1.00

Groundwater Detection Limit due to necessary sample dilution: N/A=Not Analyzed

**Summary of Chemical Analysis for Groundwater**  
**Dixon Road Exon (Facility ID 60001108 AFIN 60-03421)**  
 Little Rock, Arkansas 72206  
 All results reported in µg/L

Sample Number	Volume	E. Benzene	Total n-PAHs	OHF	OHF	1,2,4-Trimethylbenzene	1,2,4-Trimethylbenzene
MW-1	41.00	<1.00	<1.00	1.71	<1.00	<1.00	<1.00
MW-2	41.00	<1.00	<1.00	1.71	<1.00	<1.00	<1.00
MW-3	41.00	<1.00	<1.00	1.71	<1.00	<1.00	<1.00
MW-4	41.00	<1.00	<1.00	1.71	<1.00	<1.00	<1.00
MW-5	41.00	<1.00	<1.00	1.71	<1.00	<1.00	<1.00
SW-1	41.00	<1.00	<1.00	1.71	<1.00	<1.00	<1.00

Groundwater Detection Limit due to necessary sample dilution: N/A=Not Analyzed

**Figure 6**  
**Summary of Chemical Analysis for Groundwater & Surface Water**  
**Dixon Road Exon (Facility ID 60001108 AFIN 60-03421)**  
 AE&E RST LUST 60-0935  
 205 East Dixon Road  
 Little Rock, Arkansas 72206



# ARKANSAS

## ENERGY & ENVIRONMENT

### MEMORANDUM OF REVIEW Reimbursement Request Petroleum Storage Tank Trust Fund

From: Petroleum Storage Tank Trust Fund Staff

Date: May 29, 2024

Subject: **Paschal Grocery**  
**20553 Durham McCord Road**  
**Elkins, AR**  
**ID #72000205    LUST #72-0219    AFIN 72-01284**

A request for reimbursement (#1) for costs incurred during remediation of an Underground Storage Tank (UST) site was received from the Responsible Party (RP) on February 20, 2024. The RP of this site reported a product release (#72-0219) on March 26, 2020, after receiving notification of contaminated soil and groundwater during tank removal. The name and the address of the RP:

**Mary Sallee**  
**16528 Brannan Mountain Road**  
**Fayetteville, AR 72701**

The period covered by this application is April 20, 2021 through October 17, 2023. Remediation activities for which reimbursement is requested include: planning and full implementation of a Site Assessment Work Plan and Cost Estimate, Change Order #1, and preparation of Reimbursement Application #1.

Approximately 55 tons of solid waste and 2,700 gallons of contaminated liquid was removed during UST Closure operations on April 30-May 1, 2020.

This application includes two (2) invoices from Akin totaling **\$66,897.27**. Included in Akin's invoices are charges from: McClelland Consulting (\$17,540.00), SPATCO (\$10,353.35), Arkansas Analytical (\$8,525.00), and GPRS (\$1,200.00).

The consultant and the RST Case Manager have each prepared a summary of activities. (See attachments).

**RECOMMENDATION:**

The claimed cost of **\$66,897.27** was checked against documentation provided. Copies of the Cost Summary Sheet and all recap sheets provided by the RP are attached.

**The staff recommends payment as follows:**

<b>Claim filed- Form TF-1</b>	<b>\$ 66,897.27</b>
<b>Less: Deductible</b>	<b>- 7,500.00</b>
<b>Less: Adjustments</b>	<b>- <u>00.00</u></b>
<b>Total Net Claim</b>	<b><u>\$ 59,397.27</u></b>

It is recommended that the claim made by the RP be considered in the amount of **\$59,397.27**.

72000205-01 LUST #72-0219 BG, JT

# Approved Work Plans

72000205 72-0219

	<u>Date</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	09/16/2021	Conditional Approval of RSAWP & C.E.	Akin Env.	\$75,042.15
				<u>\$75,042.15</u>

APPLICATION FOR REIMBURSEMENT  
from the  
PETROLEUM STORAGE TANK TRUST FUND

(1) ADEQ Facility Identification Number: 72000205

(2) Responsible Party Information:

Company Name Paschal Grocery  
Contact Person Mary Sallee  
Address 16528 Brannan Mountain Rd  
City and State Fayetteville, AR  
Zip Code 72701  
Phone 501-634-7151

(3) Release Location

Facility Name Paschal Grocery  
Address 20553 Durham McCord Rd  
City and State Elkins, AR

(4) Type of Tank (check only):

Aboveground                       Underground

(5) Type of Product Released:

Gasoline                       Kerosene                       Jet Fuel                       Diesel                       Heating Oil

Aviation Gas                       Used Motor Oil                       Other  (list) \_\_\_\_\_

Date of Release 3/26/2020                      Release (LUST) Number 72-0219

**CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I also certify that the amounts claimed for reimbursement under this application have been paid in full. I further certify that I have the authority to submit this application on behalf of

Dempsey Wayne Sallee  
Type/Print name of Owner/Operator or Responsible Party

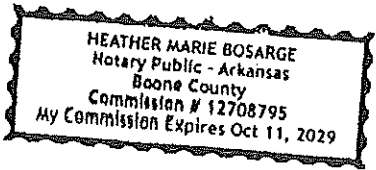
Dempsey Wayne Sallee  
Signature of Owner/Operator or Responsible Party

**ACKNOWLEDGEMENT**

Sworn to and subscribed before me this 7th day of March, 2024

Heather Marie Bosarge  
Notary Public

My Commission Expires: 10-11-29







Interim Request No.	1	COST SUMMARY SHEET			
Consultant /Responsible Party: Ms. Mary Sallee/ Akin Environmental/Spatco					
Facility Identification #: 72000205		Facility Name: Paschal Grocery			
Dates current costs incurred:	From	04/20/21	to	10/17/23	
			Request Date:	02/07/24	
<b>COST SUMMARY</b>					
<b>1. DIRECT LABOR COST (attach labor recap)</b>		<b>Hours</b>	<b>Actual Cost</b>		
Principal/Managerial		0.00	0.00		
Professional/Technical		195.50	7,140.00		
Support		0.00	0.00		
<b>Totals</b>		<b>195.50</b>	<b>7,140.00</b>		
Total Actual Labor Costs x 3				21,420.00	
<b>2. FIXED RATE COSTS (List by category - attach recap)</b>			<b>Actual Cost</b>		
Equipment Rental			0.00		
Per Diem (meals only, with documented overnight stay)			0.00		
Mileage			1,229.20		
Other			10,353.35		
<b>Total Fixed Rate Costs</b>				<b>11,582.55</b>	
<b>3. OTHER DIRECT COSTS (List by category - attach recap)</b>			<b>Actual Cost</b>		
Lodging			0.00		
Laboratory			8,525.00		
Subcontracts			18,740.00		
Supplies			0.00		
Other			990.60		
<b>Total Other Direct Costs</b>				<b>28,255.60</b>	
4. Reimbursement Preparation Cost for RA#(s) _____			(\$500 or \$1000)	1,000.00	
5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)				62,258.15	
6. Markup on Total Other Direct Costs (maximum 20 )				4,639.12	
7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)				66,897.27	
A. Total Reimbursement Requested to Date Including Above:				\$66,897.27	
B. Less Amount Deductible (\$25,000, \$15,000, or \$7,500)				\$7,500.00	
C. Less Amount Previously Retained/Disallowed by RST:				\$0.00	
D. Less Amount Previously Received (Reimbursed by ADEQ):				\$0.00	
E. Amount of this Request (same as line 7 above unless it is the 1st Request):				\$59,397.27	



Interim Request No. 1 Page 5 of 16  
 Consultant /Responsible Party: Ms. Mary Sallee/ Akin Environmental/Spatco  
 Facility Identification # 72000205 Facility Name: Paschal Grocery  
 Dates costs incurred: From 04/20/21 to 10/17/23 Request date: 02/07/24

**DIRECT LABOR COST DETAIL**

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
<b>PROFESSIONAL/TECHNICAL:</b>						
04/20/21	2237	TRACY BURBA	T1 Work Plan	6.00	\$40.00	\$240.00
04/28/21	2237	TRACY BURBA	T1 Work Plan	8.00	\$40.00	\$320.00
04/29/21	2237	TRACY BURBA	T1 Work Plan	8.00	\$40.00	\$320.00
05/12/21	2237	TRACY BURBA	T1 Work Plan	4.00	\$40.00	\$160.00
06/15/21	2237	TRACY BURBA	T1 Work Plan	8.00	\$40.00	\$320.00
06/16/21	2237	TRACY BURBA	T1 Work Plan	3.00	\$40.00	\$120.00
06/20/21	2237	TRACY BURBA	T1 Work Plan	5.00	\$40.00	\$200.00
06/20/21	2237	STEFANIE AKIN	T1 Work Plan	2.00	\$30.00	\$60.00
02/01/22	2237	TRACY BURBA	T2 EQUIP SAMPLING	3.00	\$40.00	\$120.00
02/07/22	2237	TRACY BURBA	T2 SCHEDULING	1.50	\$40.00	\$60.00
02/15/22	2237	STEFANIE AKIN	T2 GPRS SITE VISIT	8.00	\$30.00	\$240.00
02/21/22	2237	TRACY BURBA	T2 DRILLING/SAMPLIN	14.50	\$40.00	\$580.00
02/21/22	2237	JORDAN AKIN	T2 DRILLING/SAMPLIN	15.00	\$30.00	\$450.00
02/22/22	2237	TRACY BURBA	T2 DRILLING/SAMPLIN	14.50	\$40.00	\$580.00
02/22/22	2237	JORDAN AKIN	T2 DRILLING/SAMPLIN	15.00	\$30.00	\$450.00
02/24/22	2237	TRACY BURBA	T2 REPACKING	2.00	\$40.00	\$80.00
02/25/22	2237	TRACY BURBA	T2 SAMPLE DELIVERY	5.50	\$40.00	\$220.00
02/05/23	2237	TRACY BURBA	T2 WELL DEVELOPME	12.00	\$40.00	\$480.00
02/05/23	2237	JORDAN AKIN	T2 WELL DEVELOPME	13.00	\$30.00	\$390.00
02/06/23	2237	TRACY BURBA	T2 GW SAMPLING	13.00	\$40.00	\$520.00
02/06/23	2237	JORDAN AKIN	T2 GW SAMPLING	15.00	\$30.00	\$450.00
02/08/23	2237	TRACY BURBA	T2 SAMPLE DELIVERY	5.50	\$40.00	\$220.00
06/23/23	2237	TRACY BURBA	T5 BORING LOG PREP	7.00	\$40.00	\$280.00
06/25/23	2237	TRACY BURBA	T5 BORING LOG PREP	7.00	\$40.00	\$280.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
<b>ADDITIONAL PROF/TECH COSTS (from the Extra Direct Labor Page):</b>						
<b>TOTAL PROFESSIONAL/TECHNICAL COSTS:</b>				<b>195.50</b>		<b>\$7,140.00</b>



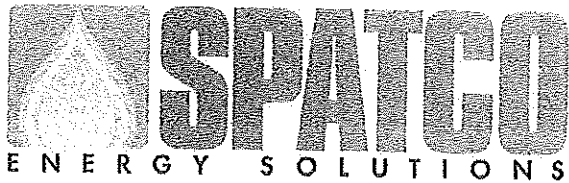












PLEASE MAKE REMITTANCE TO:  
 PO BOX 5450  
 CAROL STREAM, IL 60197-5450

AKIN ENVIRONMENTAL SERVICES  
 510 OXFORD LANE  
 HARRISON AR 72601

Ship-to address  
 PASCHAL GROCERY  
 20553 DURHAM / MCCORD ROAD  
 ELKINS AR 72727

Invoice	
Number	93692244
Date	02/07/2024
Purchase Order Number	Stephanie Akin
Sales Order Number	1523924
Customer Number	1052889
Salesman#	259, Little Rock House
Sales Office	0057, Little Rock

Currency USD

Conditions:  
 Terms of payment Net 30  
 Terms of delivery FOB SHIPPING POINT  
 SITE ASSESSMENT REPORT

Item	Item Detail		
10	Material:	INSTALLATION PRICE	
	Quantity	UOM	Installation - Contract Price
	1	EA	Price
			10,353.35
			Extended price
			10,353.35

Items total: 10,353.35  
 Invoice amount: 10,353.35

PAST DUE INVOICE SUBJECT TO 1% MONTHLY SERVICE CHARGE AFTER 30 DAYS FROM INVOICE DATE

8303 University Executive Park Drive, Suite 400 Charlotte, NC 28262  
 704-596-4373 800-477-2826 FAX 704-599-7700  
 www.spatco.com  
 FED. I.D. #04-3846075

Akin Environmental

LOCATION  
 Paschal Grocery  
 20553 Durham/ McCord Road  
 Elkins, AR 72727

DATE	DESCRIPTION	UNITS	UNIT PRICE	TOTAL PRICE
	Report Prep			
07/25/23	O. Thompson, PM - T5	2.00	\$ 120.00	\$ 240.00
07/26/23	J. Hemphill, P.G. - T5	5.00	\$ 108.18	\$ 540.90
07/31/23	O. Thompson, PM - T5	1.00	\$ 120.00	\$ 120.00
08/02/23	J. Hemphill, P.G. - T5	3.00	\$ 108.18	\$ 324.54
08/04/23	J. Hemphill, P.G. - T5	4.00	\$ 108.18	\$ 432.72
08/07/23	J. Hemphill, P.G. - T5	2.00	\$ 108.18	\$ 216.36
08/09/23	J. Hemphill, P.G. - T5	4.00	\$ 108.18	\$ 432.72
08/14/23	J. Hemphill, P.G. - T5	3.00	\$ 108.18	\$ 324.54
08/16/23	J. Hemphill, P.G. - T5	2.00	\$ 108.18	\$ 216.36
08/18/23	J. Hemphill, P.G. - T5	1.00	\$ 108.18	\$ 108.18
	Gauge			
08/19/23	J. Hemphill, P.G. - T2	7.00	\$ 108.18	\$ 757.26
08/19/23	mileage - JH - of. Paschal-office	320.00	\$ 0.70	\$ 224.00
08/19/23	Interface Probe (Spatco)	1.00	\$ 55.00	\$ 55.00
	Report prep, waste management			
08/21/23	J. Hemphill, P.G. - T5	1.00	\$ 108.18	\$ 108.18
08/21/23	D. Curry - T5	2.00	\$ 90.00	\$ 180.00
08/21/23	mileage, lab - JH	20.00	\$ 0.70	\$ 14.00
08/22/23	J. Hemphill, P.G. - T5	4.00	\$ 108.18	\$ 432.72
08/24/23	T.Hall - T5 CAD	8.0	\$ 82.92	\$ 663.36
09/05/23	J. Hemphill, P.G. - T5	3.00	\$ 108.18	\$ 324.54
09/07/23	J. Hemphill, P.G. - T5	4.00	\$ 108.18	\$ 432.72
09/07/23	T.Hall - T5 CAD	1.0	\$ 82.92	\$ 82.92
09/08/23	T.Hall - T5 CAD	1.0	\$ 82.92	\$ 82.92
09/12/23	J. Hemphill, P.G. - T5	2.00	\$ 108.18	\$ 216.36
09/14/23	J. Hemphill, P.G. - T5	4.00	\$ 108.18	\$ 432.72
10/05/23	J. Hemphill, P.G. - T5	1.00	\$ 108.18	\$ 108.18
10/06/23	O. Thompson, PM - T4	1.00	\$ 120.00	\$ 120.00
10/06/23	M. Pena, Tech - T4	8.00	\$ 75.00	\$ 600.00
10/06/23	K. Bray, Tech - T4	8.00	\$ 63.00	\$ 504.00
10/06/23	mileage - MP	14.00	\$ 0.70	\$ 9.80
10/11/23	J. Hemphill, P.G. - T5	1.00	\$ 108.18	\$ 108.18 ✓
10/11/23	O. Thompson, PM - T5	2.00	\$ 120.00	\$ 240.00
10/11/23	P. King, tech - T4	1.50	\$ 67.83	\$ 101.75
10/11/23	mileage - PK	16.00	\$ 0.70	\$ 11.20
	Trust Fund package preparation		\$ 1,000.00	\$ 1,000.00 ✓
	<b>THIRD PARTY TICKETS</b>			
		Unit	Unit Price	Total Price
10/06/23	C091828755 Penske, box truck	1.0	\$ 413.16	\$ 413.16 ✓
10/06/23	461420 Casey's General, fuel	1.0	\$ 85.81	\$ 85.81 ✓
10/17/23	252638 Valicor, Liquid	1.0	\$ 88.25	\$ 88.25 ✓
	<b>TOTAL</b>			\$ 10,353.35











# AKIN Environmental

Akin Environmental LLC  
1927 Daly Dr.  
Harrison Ar, 72601

Invoice

<b>Bill To</b>
WAYNE SALLEE 20553 DURHAM/MCCORD RD ELKINS, AR 72727

Date	Invoice No.	P.O. Number	Terms	Project
03/07/22	2237			

Item	Description	Quantity	Rate	Amount
SITE ASSESMENT WORK PLAN	SEE ATTACHED ASSESSMENT WORKPLAN		75,542.15	75,542.15
DISCOUNT PAYMENT	WORK CAME UNDER PRICE OF ESTIMATE PAYMENT ON 3-28-22		-8,644.88	-8,644.88
PAYMENT	PAYMENT ON 2-7-24		-39,891.27	-39,891.27
			<b>Subtotal</b>	<b>\$0.00</b>
			<b>Sales Tax (0.0%)</b>	<b>\$0.00</b>
			<b>Total</b>	<b>\$0.00</b>



Mr. Salley

LOCATION  
Paschal Grocery  
20553 Durham/ McCord Road  
Elkins, AR 72727

DATE	DESCRIPTION	UNITS	UNIT PRICE	TOTAL PRICE
Work Plan Prep				
4/20/2021	T. Burba, P.G. - T1	6.00	\$ 120.00	\$ 720.00
4/28/2021	T. Burba, P.G. - T1	8.00	\$ 120.00	\$ 960.00
4/29/2021	T. Burba, P.G. - T1	8.00	\$ 120.00	\$ 960.00
5/12/2021	T. Burba, P.G. - T1	4.00	\$ 120.00	\$ 480.00
6/15/2021	T. Burba, P.G. - T1	8.00	\$ 120.00	\$ 960.00
6/16/2021	T. Burba, P.G. - T1	3.00	\$ 120.00	\$ 360.00
6/20/2021	T. Burba, P.G. - T1	5.00	\$ 120.00	\$ 600.00
6/20/2021	S. Akin, Tech - T2	2.00	\$ 90.00	\$ 180.00
Field Prep, Scheduling				
2/1/2022	T. Burba, P.G. - T2	3.00	\$ 120.00	\$ 360.00
2/7/2022	T. Burba, P.G. - T2	1.50	\$ 120.00	\$ 180.00
GPRS				
2/15/2022	S. Akin, Tech - T2	8.00	\$ 90.00	\$ 720.00
2/15/2022	mileage	112.00	\$ 0.70	\$ 78.40
Drill, install wells				
2/21/2022	T. Burba, P.G. - T2	14.50	\$ 120.00	\$ 1,740.00
2/21/2022	J. Akin, Tech - T-2	15.00	\$ 90.00	\$ 1,350.00
2/21/2022	mileage	252.00	\$ 0.70	\$ 176.40
2/22/2022	T. Burba, P.G. - T2	14.50	\$ 120.00	\$ 1,740.00
2/22/2022	J. Akin, Tech - T-2	15.00	\$ 90.00	\$ 1,350.00
2/22/2022	mileage	252.00	\$ 0.70	\$ 176.40
Sample management, delivery				
2/24/2022	T. Burba, P.G. - T2	2.00	\$ 120.00	\$ 240.00
2/25/2022	T. Burba, P.G. - T2	5.50	\$ 120.00	\$ 660.00
2/25/2022	mileage	318.00	\$ 0.70	\$ 222.60
Develop wells				
2/5/2023	T. Burba, P.G. - T2	12.00	\$ 120.00	\$ 1,440.00
2/5/2023	J. Akin, Tech - T-2	13.00	\$ 90.00	\$ 1,170.00
2/5/2023	mileage	252.00	\$ 0.70	\$ 176.40
Sample wells				
2/6/2023	T. Burba, P.G. - T2	13.00	\$ 120.00	\$ 1,560.00
2/6/2023	J. Akin, Tech - T-2	15.00	\$ 90.00	\$ 1,350.00
2/6/2023	mileage	252.00	\$ 0.70	\$ 176.40

DATE	DESCRIPTION	UNITS	UNIT PRICE	TOTAL PRICE
Deliver samples				
2/8/2023	T. Burba, P.G. - T2	5.50	\$ 120.00	\$ 660.00
2/8/2023	mileage	318.00	\$ 0.70	\$ 222.60
Boring Logs				
6/23/2023	T. Burba, P.G. - T5	7.00	\$ 120.00	\$ 840.00
6/25/2023	T. Burba, P.G. - T5	7.00	\$ 120.00	\$ 840.00
Report Prep				
7/25/2023	O. Thompson, PM - T5	2.00	\$ 120.00	\$ 240.00
7/26/2023	J. Hemphill, P.G. - T5	5.00	\$ 108.18	\$ 540.90
7/31/2023	O. Thompson, PM - T5	1.00	\$ 120.00	\$ 120.00
8/2/2023	J. Hemphill, P.G. - T5	3.00	\$ 108.18	\$ 324.54
8/4/2023	J. Hemphill, P.G. - T5	4.00	\$ 108.18	\$ 432.72
8/7/2023	J. Hemphill, P.G. - T5	2.00	\$ 108.18	\$ 216.36
8/9/2023	J. Hemphill, P.G. - T5	4.00	\$ 108.18	\$ 432.72
8/14/2023	J. Hemphill, P.G. - T5	3.00	\$ 108.18	\$ 324.54
8/16/2023	J. Hemphill, P.G. - T5	2.00	\$ 108.18	\$ 216.36
8/18/2023	J. Hemphill, P.G. - T5	1.00	\$ 108.18	\$ 108.18
Gauge				
8/19/2023	J. Hemphill, P.G. - T2	7.00	\$ 108.18	\$ 757.26
8/19/2023	mileage - JH - of. Paschal-office	320.00	\$ 0.70	\$ 224.00
8/19/2023	Interface Probe (Spatco)	1.00	\$ 55.00	\$ 55.00
Report prep, waste management				
8/21/2023	J. Hemphill, P.G. - T5	1.00	\$ 108.18	\$ 108.18
8/21/2023	D. Curry - T5	2.00	\$ 90.00	\$ 180.00
8/21/2023	mileage, lab - JH	20.00	\$ 0.70	\$ 14.00
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8/24/2023	T.Hall - T5 CAD	8.00	\$ 82.92	\$ 663.36
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9/7/2023	J. Hemphill, P.G. - T5	4.00	\$ 108.18	\$ 432.72
9/7/2023	T.Hall - T5 CAD	1.00	\$ 82.92	\$ 82.92
9/8/2023	T.Hall - T5 CAD	1.00	\$ 82.92	\$ 82.92
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9/14/2023	J. Hemphill, P.G. - T5	4.00	\$ 108.18	\$ 432.72
10/5/2023	J. Hemphill, P.G. - T5	1.00	\$ 108.18	\$ 108.18
10/6/2023	O. Thompson, PM - T4	1.00	\$ 120.00	\$ 120.00
10/6/2023	M. Pena, Tech - T4	8.00	\$ 75.00	\$ 600.00
10/6/2023	K. Bray, Tech - T4	8.00	\$ 63.00	\$ 504.00
10/6/2023	mileage - MP	14.00	\$ 0.70	\$ 9.80
10/11/2023	J. Hemphill, P.G. - T5	1.00	\$ 108.18	\$ 108.18

DATE	DESCRIPTION	UNITS	UNIT PRICE	TOTAL PRICE
10/11/2023	O. Thompson, PM - T5	2.00	\$ 120.00	\$ 240.00
10/11/2023	P. King, tech - T4	1.50	\$ 67.83	\$ 101.75
10/11/2023	mileage - PK	16.00	\$ 0.70	\$ 11.20
	Trust Fund package preparation	1.00	\$ 1,000.00	\$ 1,000.00
THIRD PARTY TICKETS		Unit	Unit Price	Total Price
3/8/2022	Sample Analysis	1.00	\$ 1,080.00	\$ 1,080.00
3/8/2022	Sample Analysis	1.00	\$ 3,060.00	\$ 3,060.00
3/8/2022	Sample Analysis	1.00	\$ 432.00	\$ 432.00
3/9/2022	Sample Analysis	1.00	\$ 1,452.00	\$ 1,452.00
3/23/2023	Sample Analysis	1.00	\$ 4,206.00	\$ 4,206.00
2/15/2022	GPRS	1.00	\$ 1,440.00	\$ 1,440.00
3/9/2022	Drilling	1.00	\$ 21,048.00	\$ 21,048.00
2/14/2023	Geotech Materials	1.00	\$ 268.96	\$ 268.96
2/14/2023	Geotech Materials	1.00	\$ 506.51	\$ 506.51
10/16/2023	Soil Disposal	1.00	\$ 401.26	\$ 401.26
10/6/2023	Drum Transport	1.00	\$ 413.16	\$ 413.16
10/6/2023	Fuel for drum transport	1.00	\$ 85.81	\$ 85.81
10/17/2023	Liquid Disposal	1.00	\$ 88.25	\$ 88.25
	TOTAL			\$ 66,897.27



# ARKANSAS

## ENERGY & ENVIRONMENT

### MEMORANDUM

*Bridget Green 4/16/24*  
**To:** Jacqueline Trotta, Trust Fund Administrator  
Assessment & Remediation Program, Office of Land Resources

**Through:** Blake Whittle, P.G., Groundwater Branch Manager *BW 4/15/24*  
A & R Program, OLR

**From:** Joshua Stevens, P.G., Geologist Supervisor *JS*  
Regulated Storage Tanks - A & R Program, OLR

**Date:** April 15, 2024

**Subject:** Technical Review of Reimbursement Application #1  
For Time Period: April 20, 2021 to October 17, 2023  
Amount Requested: \$59,397.27  
Paschal Grocery  
20553 Durham / McCord Road  
Elkins, AR 72727  
LUST #72-0219      AFIN # 72-01284      ID # 72000205

The following is in response to your memo to me dated February 23, 2024.

#### 1. Status of Release

- a) *At which step in the Subpart F process is the LUST case, i.e., Site Investigation, CAP, or FP Removal?*

The referenced LUST case is in the Site Investigation phase of Subpart F.

- b) *If the remedy has been selected, what are the clean-up goals? Identify any issues that may delay progress or resolution of the case.*

A remedy and/or clean-up goals have not yet been selected.

The project's planning, implementation, and reporting have been significantly delayed by the RP's original consultant (Akin Environmental). Progress will be additionally delayed by a change in land use not coordinated with the Responsible Party (RP) or the Department. The lack of coordination has led to the destruction of at least two (2) RCRA groundwater monitor wells installed during site assessment investigation.

- c) *With the exception of investigation-derived wastes, if contaminated soil or ground water has been removed from the site, describe the quantity and type of contamination removed.*

Approximately 55 tons of solid waste and 2,700 gal. of contaminated liquid was removed during UST Closure operations on April 30-May 1, 2020.

## 2. Reimbursement Application

- a) *Briefly describe the activities for which reimbursement is requested and the specific work plan(s) or change order(s) (cost approvals) under which activities were authorized.*

The applicant is requesting reimbursement of costs incurred during the following activities:

- Planning and full implementation of a Site Assessment Work Plan and Cost Estimate, approved September 16, 2021.
- Change Order #1 approved March 4, 2024.
- The Preparation of Reimbursement Application #1

- b) *Identify any activity that may conflict with Reg. 12 or that was not pre-approved by the technical staff.*

I have not identified any activity which conflicts with Reg. 12 or which was not pre-approved by the technical staff.

- c) *If you do not agree with the consultant's project summary, state the areas of disagreement. If the consultant's summary is incomplete, or no summary is provided, give a brief history of the project to date.*

The consultant's project summary reasonably reflects my understanding of the LUST case.

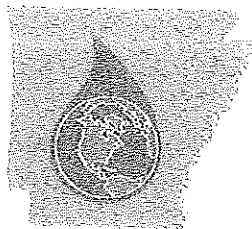
## 3. Maps & Graphs

- a) *If not provided by the consultant in the application, please attach site maps that identify the location of the site and the area of the release within the site.*

The consultant has provided potentiometric surface maps.

- b) *Include any data and/or graphs that illustrate relevant environmental information in support of your summary.*

I have no further comments at this time.



AKIN  
Environmental



1927 Daly Dr Lane Harrison Arkansas 72601 (870) 577-4067

PASHCAL GROCERY  
20553 Durham / McCord Road  
Elkins, AR 72727

April 20, 2021 through October 17, 2023

Facility ID: 72000205

LUST #: 72-0219

Claim Amount= \$59,397.27

In a letter dated March 2, 2021, the Arkansas Department of Energy and Environment, Office of Land Management, Assessment and Remediation Program – Regulated Storage Tanks (RST) requested Mr. Wayne Sallee to prepare a Site Assessment Work Plan (SAWP) & Cost Estimate to investigate the extent of petroleum contamination identified following a voluntary UST closure at the property known as Paschal Grocery in Elkins, Arkansas. The revised work plan and cost estimate were submitted on August 10, 2021 and approved for implementation on September 16, 2021.

The approved work plan called for fourteen (14) boring locations and ten (10) groundwater monitoring wells installed on the property. Soil sampling was conducted in February of 2022 and groundwater sampling was conducted in February of 2023. Akin Environmental was engaged by the RP to conduct the requested work. The assessment indicates the presence of lead in surface soils, GRO, DRO, and VOCs in subsurface soils and groundwater. Free product in contact with groundwater was initially observed during UST closure activities; however, free product was not observed during the assessment activities.

This is the first reimbursement package for LUST #: 72-0219 and consists of one invoice totaling \$66,897.27.

Total Approved Work Plan Costs: \$75,042.15

Change Order #1: \$463.69

Previous reimbursement: \$0.00

Work Plan Balance: \$8,144.88

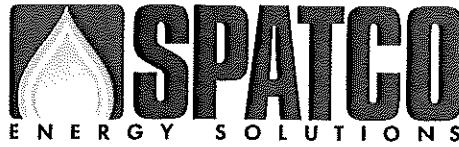
Invoiced Amount: \$66,897.27

Deductible: \$7500

Current Reimbursement Request: \$59,397.27

Remaining Work Plan balance: \$8,144.88

Thank you,  
Stephanie Akin - Environmental Manager  
870-350-6047



RECEIVED

FEB 16 2024

AR 4:14 pm

February 16, 2024

Ms. Jacqueline Trotta, CPM  
Trust Fund Administrator  
Arkansas Department of Energy and Environment  
Division of Environmental Quality  
Office of Land Resources  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

RECEIVED

FEB 20 2024

DEQ - RST

RE: Reimbursement Application # 1  
Pashcal Grocery  
20553 Durham / McCord Road  
Elkins, AR 72727  
DEQ ID #: 72000205; LUST #: 72-0219

Dear Ms. Trotta:

Please find attached the Reimbursement Application #1 for the above referenced facility in the amount of \$59,397.27. RA#1 is for Site Assessment activity.

Should you have any questions or require additional information, please do not hesitate to call Oriana Thompson at 501-376-6333.

Sincerely,  
On Behalf of SPATCO Energy Solutions, LLC,

A handwritten signature in black ink, appearing to read "Oriana Thompson", is written over a horizontal line.

Oriana Thompson  
Environmental Department Manager.



PASHCAL GROCERY  
20553 Durham / McCord Road  
Elkins, AR 72727

April 20, 2021 through October 17, 2023

Facility ID: 72000205

LUST #: 72-0219

Claim Amount= \$59,397.27

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The approved work plan called for fourteen (14) boring locations and ten (10) groundwater monitoring wells installed on the property. Soil sampling was conducted in February of 2022 and groundwater sampling was conducted in February of 2023. Akin Environmental was engaged by the RP to conduct the requested work. Akin originally subcontracted geological services to Ms. Tracy Burba, P.G.; however, due to extended delays, Akin engaged SPATCO to complete and submit the report.

The assessment indicates the presence of lead in surface soils, GRO, DRO, and VOCs in subsurface soils and groundwater. Free product in contact with groundwater was initially observed during UST closure activities; however, free product was not observed during the assessment activities.

This is the first reimbursement package for LUST #: 72-0219 and consists of one invoice totaling \$66,897.27.

Total Approved Work Plan Costs: \$75,042.15  
Change Order #1: \$463.69  
Previous reimbursement: \$0.00  
Work Plan Balance: \$8,144.88  
Invoiced Amount: \$66,897.27  
Deductible: \$7500  
Current Reimbursement Request: \$59,397.27  
Remaining Work Plan balance: \$8,144.88

SPATCO Energy Solutions, LLC appreciates the Arkansas Department of Environmental Quality's continued cooperation on this project. If you have any questions, please contact me at 501-376-6333.

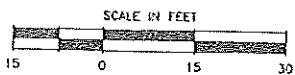
Regards,

A handwritten signature in black ink, appearing to read "Oriana Thompson".

Oriana Thompson, M.S.  
Environmental Division Manager



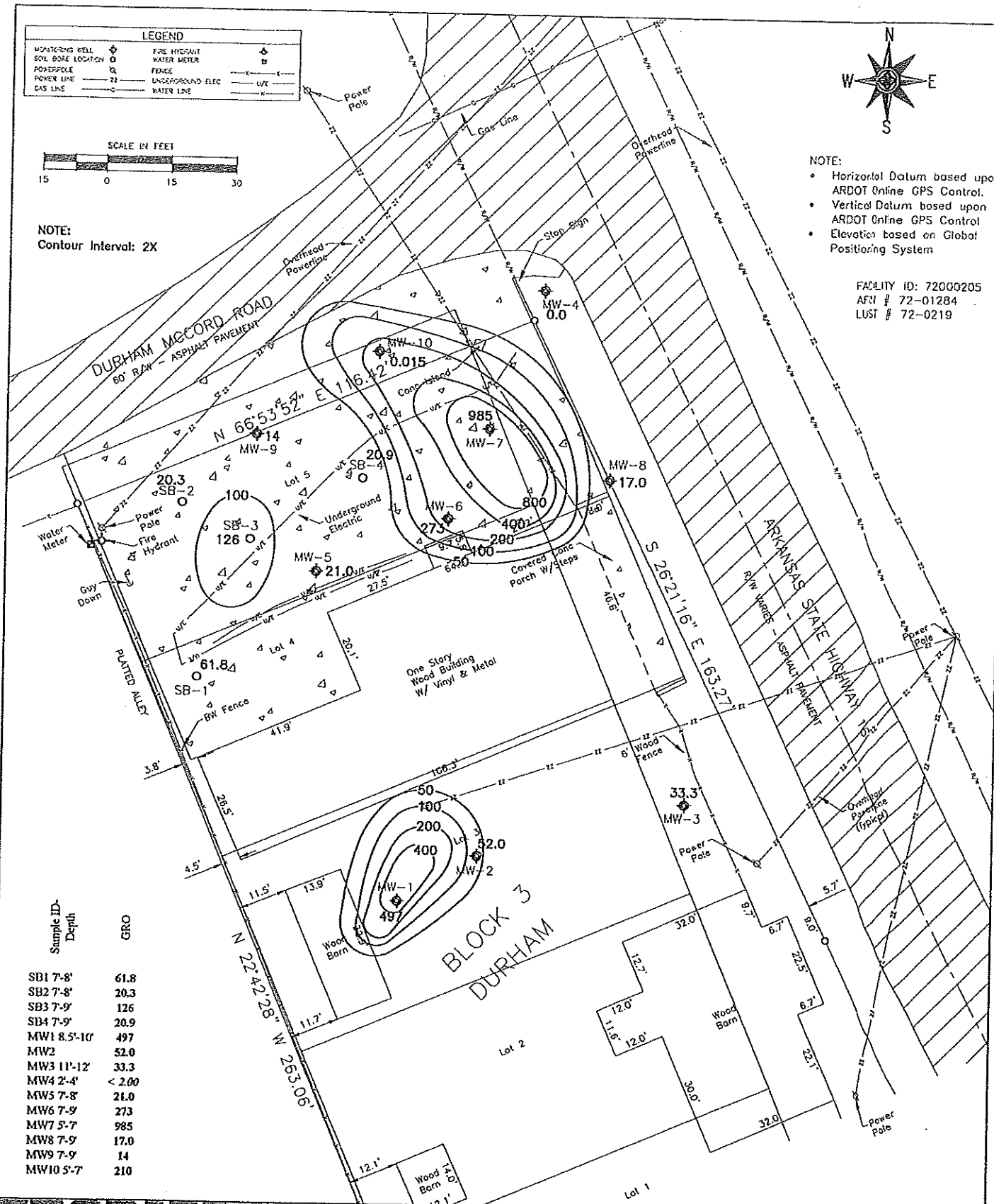
LEGEND	
MONITORING WELL	◆
SOIL GASE LOCATION	○
POWERSPOLE	⊕
POWER LINE	—
GAS LINE	—
FIRE HYDRANT	⊕
WATER METER	⊕
FENCE	—
UNDERGROUND ELEC	—
WATER LINE	—



- NOTE:
- Horizontal Datum based upon ARDOT Online GPS Control.
  - Vertical Datum based upon ARDOT Online GPS Control
  - Elevation based on Global Positioning System

FACILITY ID: 72000205  
 AFN # 72-01284  
 LUST # 72-0219

NOTE:  
 Contour Interval: 2X



Sample ID- Depth	GRO
SB1 7'-8"	61.8
SB2 7'-8"	20.3
SB3 7'-9"	126
SB4 7'-9"	20.9
MW1 8.5'-10'	497
MW2	52.0
MW3 11'-12"	33.3
MW4 2'-4"	< 2.00
MW5 7'-8"	21.0
MW6 7'-9"	273
MW7 5'-7"	985
MW8 7'-9"	17.0
MW9 7'-9"	14
MW10 5'-7"	210

**SPATCO**  
 ENERGY SOLUTIONS  
 1201 N Cypress Street,  
 North Little Rock, AR 72114

**GRO in Soil**  
 (mg/kg)

Drawn Tucker Hall-Staff Engineer (8/24/23)  
 Checked Jason Hemphill, P.G. Project Manager (8/24/23)

Paschal  
 Grocery

20553 Durham /  
 McCord Road -  
 Elkins, Arkansas  
 72727

Figure NO.  
 03

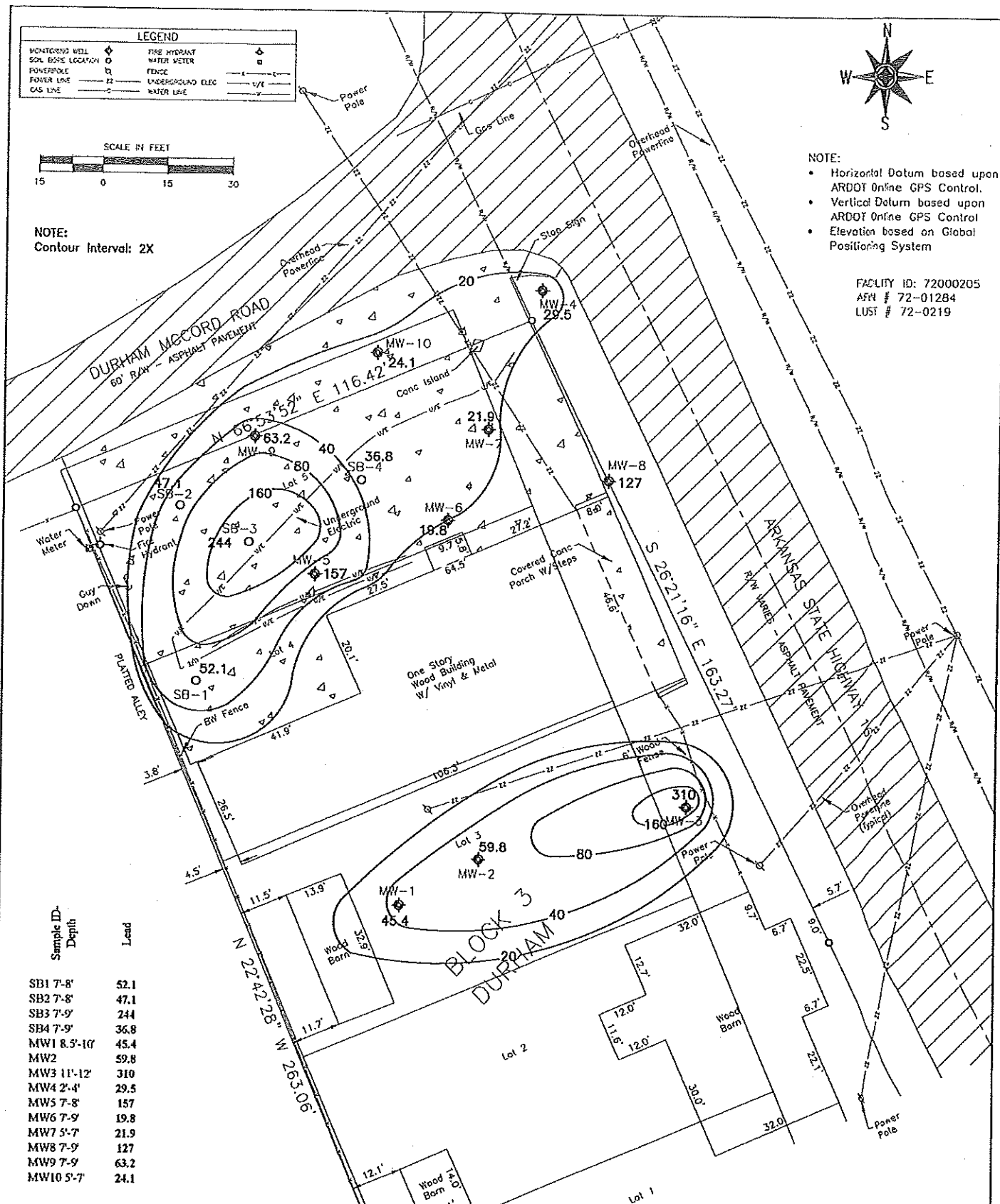
LEGEND	
MONITORING WELL	◆
SOIL SAMPLE LOCATION	○
POWER POLE	⊕
POWER LINE	—
GAS LINE	—
FIRE HYDRANT	⊕
WATER METER	⊕
FENCE	—
UNDERGROUND ELEC	—
WATER LINE	—



- NOTE:
- Horizontal Datum based upon ARDOT Online GPS Control.
  - Vertical Datum based upon ARDOT Online GPS Control
  - Elevation based on Global Positioning System

FACILITY ID: 72000205  
 AFR # 72-01284  
 LUST # 72-0219

NOTE:  
 Contour Interval: 2X



Sample ID- Depth	Lead
SB1 7'-8"	52.1
SB2 7'-8"	47.1
SB3 7'-9"	244
SB4 7'-9"	36.8
MW1 8.5'-10'	45.4
MW2	59.8
MW3 11'-12'	310
MW4 2'-4'	29.5
MW5 7'-8"	157
MW6 7'-9"	19.8
MW7 5'-7"	21.9
MW8 7'-9"	127
MW9 7'-9"	63.2
MW10 5'-7"	24.1



1201 N Cypress Street,  
 North Little Rock, AR 72114

### Lead in Surface Soil (mg/kg)

Drawn Tucker Hall, Staff Engineer (8/24/23)  
 Checked Jason Hemphill, P.G. Project Manager (8/24/23)

Paschal  
 Grocery

20553 Durham /  
 McCord Road -  
 Elkins, Arkansas  
 72727

Figure NO.  
 06

LEGEND	
MONITORING WELL	◆
SOIL BOPE LOCATION	○
POWER POLE	⊕
POWER LINE	—
GAS LINE	—
FIRE HYDRANT	⊕
WATER METER	⊕
FENCE	—
UNDERGROUND DUCT	—
WATER LINE	—

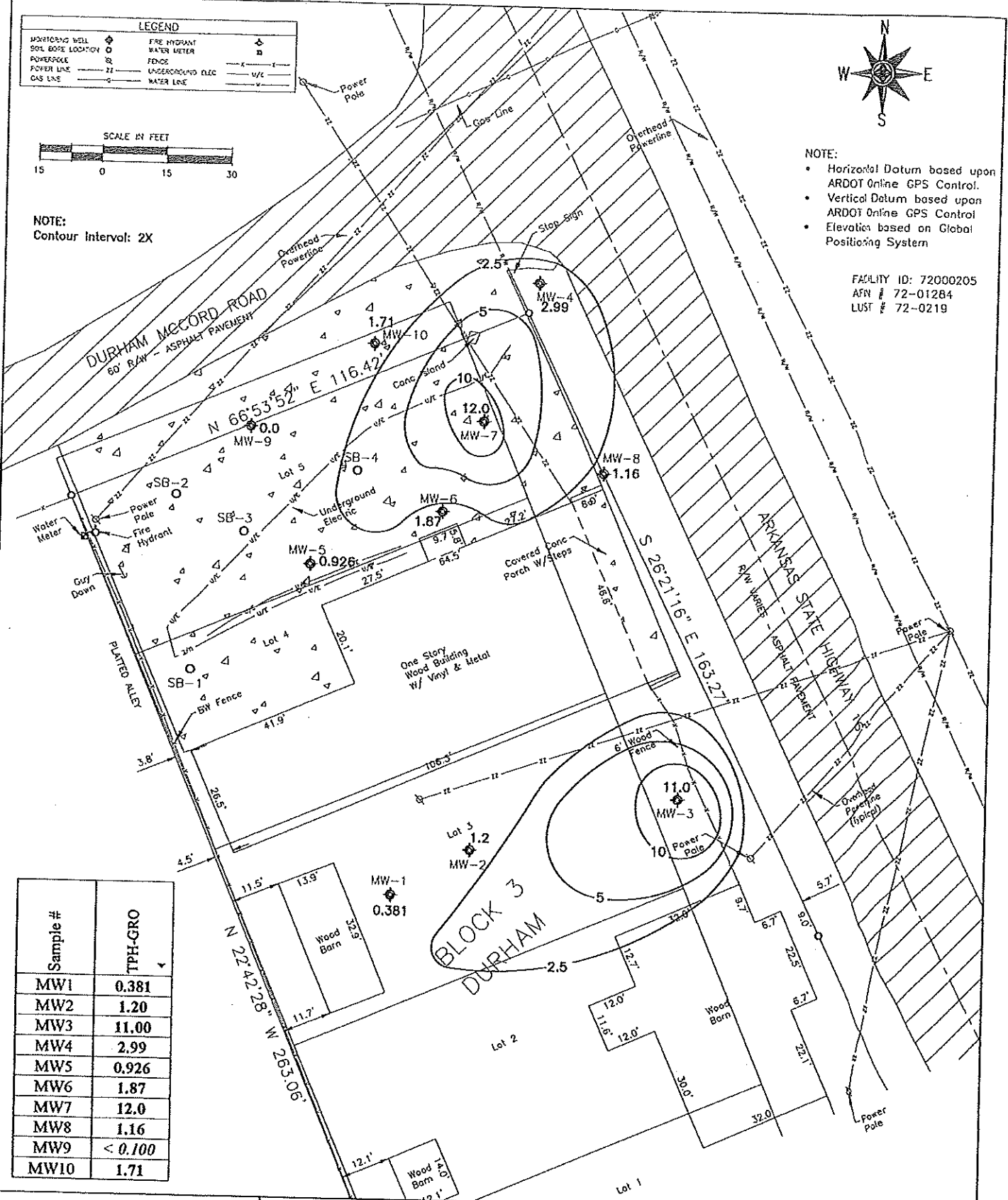


NOTE:  
Contour Interval: 2X



- NOTE:
- Horizontal Datum based upon ARDOT Online GPS Control.
  - Vertical Datum based upon ARDOT Online GPS Control
  - Elevation based on Global Positioning System

FACILITY ID: 72000205  
AFN # 72-01284  
LUST # 72-0219



Sample #	TPH-GRO
MW1	0.381
MW2	1.20
MW3	11.00
MW4	2.99
MW5	0.926
MW6	1.87
MW7	12.0
MW8	1.16
MW9	< 0.100
MW10	1.71

1201 N Cypress Street, North Little Rock, AR 72114	<b>GRO in Groundwater</b> (mg/L)	Paschal Grocery	20553 Durham / McCord Road - Elkins, Arkansas 72727	Figure NO.  08
	Drawn Tucker Hall, Staff Engineer (8/24/23) Checked Jason Hemphill, P.G. Project Manager (8/24/23)			