



ARKANSAS ENERGY & ENVIRONMENT

AGENDA

Division of Environmental Quality, Office of Land Resources

DETAILS

Date | Time | Location: 6/26/2024 | 9:00 am | 5301 Northshore Dr. NLR, Commission Room 1W06 (in-person only)

Subject: Advisory Committee on Petroleum Storage Tanks

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 66-0216	PMI/TERR	7	Ron's NSC Inc. (Pic-N-Tote #9), Fort Smith	\$16,154.12
2 18-0096	SPATCO	3	Flash Market #10, West Memphis	\$65,894.55
3 18-0144	SPATCO	5	Marion BP (former), Marion	\$31,423.81
4 58-0099	SPATCO	3	Hob Nob Store (Shell), Russellville	\$10,382.56
5 60-0973	SPATCO	1	I-30 Superstore (former Roosevelt Exxon), Little Rock	\$51,661.77
6 28-0029	EPC	9	Marmaduke Chevron, Marmaduke	\$4,388.00
7 34-0019	EPC	3	Panky 66 Station, Newport	\$37,581.52
8 18-0123	CETS	4	Former J-Mart #3, West Memphis	\$42,446.63
9 09-0010	PPM	15	Former Valero Corner Store, Dermott	\$22,095.09
Total				\$282,028.05

VI. Other Business -



**DIVISION OF
ENVIRONMENTAL QUALITY**

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

**Minutes
Advisory Committee on Petroleum Storage Tanks
May 29, 2024**

The Advisory Committee on Petroleum Storage Tanks held a meeting at 9:00 a.m., on May 29, 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, McMillan, and Free. May was not present.

DEQ/OLR staff members present were: Jacqueline Trotta, Bridget Green, Jarrod Zweifel, Joshua Stevens, Dianna Kilburn, and Blake Whittle. E&E legal staff present was Lisa Thompson. Other guests present were: Stan Rasburry, PMI (Terracon); Oriana Thompson, SPATCO; Jason Hemphill, SPATCO; David Diehl, EPC; Scott Kempf, Snyder; Steve Ferren, AOMA; Cindy McCuin, AOMA; Tyler Lachowsky, AOMA. Other guest who attended (via teleconference) were: Stephanie Akin, AKIN; and Jordan Harper, PPM. No one from the Attorney General's office was present.

Minutes from the May 1, 2024, meeting were reviewed for comments. Crossfield made the motion to approve the minutes and McMillan seconded the motion. The motion carried.

A Financial Status Summary was given by Jacqueline Trotta, OLR. The Petroleum Storage Tank Trust Fund balance as of April 30, 2024, was \$44,745,900.17, and the adjusted Fund balance was \$18,841,642.96.

Seven sites with interim applications for reimbursement were presented by Dianna Kilburn. The grand total of all requests as recommended was \$245,306.64.

Resolution 24-29: Reimbursement to Mayflower Quick Mart, Attn: Anil Gupta, P.O. Box 309, Prescott, AR 71857, for corrective action costs at Mayflower Quick Mart, 555 Highway 365/Highway 89, Mayflower, AR, ID #23000021, was recommended for payment in the amount of \$12,778.82. Stan Rasburry, PMI (Terracon), represented this facility. McMillan made the motion to approve the resolution. Goings seconded the motion. The motion carried.

Resolution 24-30: Reimbursement to JayCo, Inc., Attn: Steve Reed, P.O. Box 580, Carlisle, AR 72024, for corrective action costs at Forrest City Shell, 2335 North Washington Avenue, Forrest City, AR, ID #62000124, was recommended for payment in the amount of \$71,641.80. Stan Rasburry, PMI (Terracon), represented this facility. Goings made the motion to approve the resolution. Crossfield seconded the motion. The motion carried.

Resolution 24-31: Reimbursement to B-H-T Investments Co., Inc., Attn: Steve Lightle, P.O. Box 1469, Searcy, AR 72145, for corrective action costs at Doublebee's #104, 409 Wilbur Mills Avenue, Kensett, AR, ID #73000162, was recommended for payment in the amount of \$13,073.15. Stan Rasburry, PMI (Terracon), represented this facility. McMillan made the motion to approve the resolution. Crossfield seconded the motion. The motion carried.



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Resolution 24-32: Reimbursement to JRM4 LLC, Attn: Jackie McClure, P.O. Box 47, Harrisburg, AR 72432, for corrective action costs at Exxon Circle N South, 1414 North Main, Brinkley, AR, ID #48000019, was recommended for payment in the amount of \$12,055.15. David Diehl, EPC represented this facility. McMillan made the motion to approve the resolution. Goings seconded the motion. The motion carried.

Resolution 24-34: Reimbursement to CST Arkansas Stations, LLC/Circle K, Attn: Mike McKoy, 1100 Situs Court Suite 100, Raleigh, NC 27606, for corrective action costs at Former Valero Corner Store, 301 East Speedway, Dermott, AR, ID #09000027, was recommended for payment in the amount of \$21,040.35. Jordan Harper, PPM represented this facility. Crossfield made the motion to approve the resolution. McMillan seconded the motion. The motion carried.

Resolution 24-35: Reimbursement to Dixon Road Exxon, Attn: Shama Khimani, 111 West Dixon Road, Little Rock, AR 72206, for corrective action costs at Dixon Road Exxon, 205 East Dixon Road, Little Rock, AR ID #60001108, was recommended for payment in the amount of \$55,320.10. Scott Kempf, Snyder represented this facility. Crossfield made the motion to approve the resolution. Free seconded the motion. The motion carried.

Resolution 24-36: Reimbursement to Mary Sallee, 16528 Brannan Mountain Road, Fayetteville, AR 72701, for corrective action costs at Paschal Grocery, 20553 Durham McCord Road, Elkins, AR, ID #09000051, was recommended for payment in the amount of \$59,397.27. Jason Hemphill, SPATCO represented this facility. McMillan made the motion to approve the resolution. Free seconded the motion. The motion carried.

The next regular meeting will be held on June 26, 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 9:51 a.m.

ARKANSAS DEPARTMENT OF ENERGY AND ENVIRONMENT

Assessment and Remediation, OLR - Petroleum Storage Tank State Trust Fund Financial Status Report for Period Ending May 31, 2024

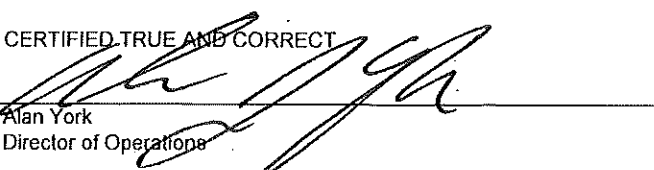
I. Fund Balance on May 1, 2024 -----		<u>\$ 44,745,900.17</u>
II. Receipts		
1. Previously reported -----	\$ 213,676,461.47	
2. May receipts -----	<u>\$ 691,692.83</u>	
Total receipts to date -----		\$ 214,368,154.30
III. Expenditures		
1. Previously reported -----	\$ 168,930,561.30	
2. May expenditures -----	<u>\$ 625,869.22</u>	
Total expenditures to date -----		<u>\$ 169,556,430.52</u>
IV. Fund Balance on May 31, 2024 -----		\$ 44,811,723.78
V. Interest		
1. Previously reported -----	\$14,040,054.17	
2. May Interest -----	<u>\$ -</u>	
Total interest to date -----		<u>\$ 14,040,054.17</u>
VI. Total investments on May 31 2024 -----		<u>\$ 38,231,729.51</u>
VII. Funds available on May 31, 2024 -----		<u>\$ 6,579,994.27</u>

STATUS OF TRUST FUND

* provided by OLR - Petroleum Storage Tank Division

	5/31/2024	
Reserve for emergency projects -----	\$	<u>44,811,723.78</u>
Current claims received -----	\$	350,000.00
Claims approved but unpaid -----	\$	666,130.62
Other corrective action obligations (estimated) -----	\$	245,306.64
Orphan Sites -Corrective action obligations (estimated) -----	\$	9,663,866.37
Potential third party obligations (estimated) -----	\$	13,831,000.00
Adjusted balance -----	\$	<u>985,000.00</u>
		<u>\$ 19,070,420.15</u>

CERTIFIED TRUE AND CORRECT


 Alan York
 Director of Operations

SUPPLEMENTAL FINANCIAL INFORMATION		31-May-24			
Regulated Storage Tank Division - Petroleum Storage Tank State Trust Fund		10:08:50 AM			
Amounts Held By Trustee					
For Periods Ending:		31-May-24			
Item	Inception	Current	Fiscal Year July 1	Average	
No. Description	Of Program	Month	To Date	Per Month	
=====		=====		Current F.Y.	
I	Fund Balance - Beginning	\$0.00	\$44,745,900.17	\$44,343,059.30	
II	Receipts:				
(1)	Petroleum Envrmt Fee	\$ 198,940,865.10	\$ 691,692.83	\$7,219,572.51	\$656,324.77
(2)	Investment Income - Interest	14,040,054.17	\$ -	2,094,021.25	190,365.57
(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	\$214,368,154.30	\$691,692.83	\$9,313,593.76	\$846,690.34
III	Expenditures:				
(1)	Remediation Reimbursements	138,458,766.95	573,928.70	5,868,503.44	\$533,500.31
(1a)	Third-Party Damage Payments	12,728,042.29	-	509,630.00	46,330.00
(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)	3,922,582.90	11,420.02	2,104,185.47	191,289.59
(2b)	Other Expenses (beginning 7/01/19)	478,299.20	0.00	30,582.93	2,780.27
(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	-	50,817.80	4,619.80
(6)	RST Budget Expenses/Equipment	6,141,354.32	40,520.50	281,209.64	25,564.51
	Total Expenditures	\$169,556,430.52	\$625,869.22	\$8,844,929.28	\$804,084.48
IV	Fund Assets - Bal.	31-May-24	\$44,811,723.78	\$44,811,723.78	\$44,811,723.78
V	Investments: beginning of period	\$0.00	38,231,729.51	38,217,187.50	
	Interest Income Earned	14,040,054.17	0.00	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.	6,579,994.27	4,500,515.03	
	Total Trust Fund	31-May-24	N.A.	\$44,811,723.78	\$44,811,723.78
	Average Monthly C.D. Bal Current F.Y. T.D.			\$3,474,289.77	
	Approximate Average Cash Basis Investment Yield - Current F.Y.			55.249% *	
	Status of Trust Fund	31-May-24	AMOUNTS		
	Fund Balance on:	31-May-24	\$44,811,723.78		
	Reserve for Emergency Projects		-350,000.00		
	Current Claims Received		-666,130.62		
	Claims Approved But Unpaid		-245,306.64		
	Other Estimated Remaining Obligations - Unpaid Work Plans Approved		-9,663,866.37 ***		
	Other Estimated Remaining Obligations - Orphan sites State Lead		-13,831,000.00		
	Subtotal		20,055,420.15		
	Less: Estimated - Potential Third Party Claims (Listed Below)**		-985,000.00 **		
	Adjusted Fund Balance - Unreserved	31-May-24	\$19,070,420.15		
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 - May 2024

Reimbursement Claims - May 1, 2024 (April meeting was rescheduled)	\$573,928.70
Staff Salaries/Match	\$40,520.50
On-Call Contract, AECOM, Williams Junction, LAST 53-0014	\$11,420.02
Legal Staff Salary (West Publishing Corp)	\$0.00
Shared Resources	\$0.00
Total Expenses	<u><u>\$625,869.22</u></u>

State Trust Fund Income Breakdown - May 2024

Petroleum Environmental Fee	\$691,692.83
Interest paid	\$0.00
Total Income	<u><u>\$691,692.83</u></u>

Regulated Storage Tanks
Inventory of orphan LUST/LAST projects

Effective 05/31/2024

UIC	Fac ID	ATN Facility Name	City	UST/LAST	Cost Code	Date Authorized	Pending Activity	Estimate 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	Z001632	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)	\$1,612,000
54-0008	54000105	54-00324 West Acres Mini Mart - Citgo	W. Helena	UST	17046	8/12/2007	CAP needed (excavation)	\$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)	\$650,000
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	Z1001635	71-00204 Highway 65 Country Store	Damascus	AST	27011	10/11/2018	Active investigation; approved costs appear in "other CA obligations"	\$0
71-0026	Z1000042	71-00193 Flash Market #409	Shitley	UST	17118	2/19/2021	Active investigation; approved costs appear in "other CA obligations"	\$0
72-0009	Z2000049	72-00337 Former Road Runner #60	Fayetteville	UST	17003	1/24/2011	FPR needed (horizontal extraction wells via DPE)	\$1,270,000
Grand Total								* \$13,831,000

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



ARKANSAS

ENERGY & ENVIRONMENT

MEMORANDUM OF REVIEW
Reimbursement Request
Petroleum Storage Tank Trust Fund

From: Petroleum Storage Tank Trust Fund Staff

Date: June 26, 2024

Subject: **Rons NSC Inc. (Pic-N-Tote #9)**
5114 Rye Hill Road East
Fort Smith, AR
ID #66001793 LUST #66-0216 AFIN 66-01400

A request for reimbursement (#7) for costs incurred during remediation of an Underground Storage Tank (UST) site was received from the Responsible Party (RP) on April 17, 2024. The RP of this site reported a product release (#66-0216) on February 14, 2019, after a Phase II Environmental Assessment Report identified free product gasoline in the soil boring. The name and the address of the RP:

Family Stops USA, LLC
Attn: Jonathan Griffin
8405 South Zero Street, Suite C
Fort Smith, AR 72903

The period covered by this application is May 10, 2023 through February 19, 2024. Remediation activities for which reimbursement is requested include: implementation of the Corrective Action Plan, Corrective Action Monitoring Events #3 and #4, preparation and implementation of the Monitoring Well Decommissioning Work Plan and Cost Estimate and preparation of Reimbursement Application #7.

During monitoring well decommissioning activities performed on December 1, 2023, a total of 10 gallons of contaminated groundwater were disposed at the Future Energy Services facility in Damascus, Arkansas.

A 'No Further Action' letter was issued on December 29, 2023.

This application includes six (6) invoices from Pollution Management, Inc., (A Terracon Company) (PMI) totaling **\$16,154.12**. Included in PMI's invoices are charges from: Waypoint Analytical (\$1,870.00) and Pine Environmental (\$832.59).

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

RECOMMENDATION:

The claimed cost of **\$16,154.12** 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:

Claim filed- Form TF-1	\$ 16,154.12
Less: Deductible	- 00.00
Less: Adjustments	- <u>00.00</u>
Total Net Claim	<u>\$ 16,154.12</u>

It is recommended that the claim made by the RP be considered in the amount of **\$16,154.12**.

66001793-07 LUST #66-0216 BG, JT

Approved Work Plans

66001793 66-0216 RON'S NSC INC.

	<u>Date</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	12/02/2019	Approval of RSAWP and Cost Estimate	PMI	\$51,238.96
02	05/06/2020	Approval of C.O. #1 SAWP	PMI	\$11,905.34
03	12/01/2020	Approval of Additional SAWP & C.E.	PMI	\$12,884.45
04	07/07/2022	Approval of CAP & C.E.	PMI	\$511,501.04
05	10/14/2022	Approval of C.O. #1 and Corrective Action Plan	PMI	\$7,400.79
06	11/27/2023	Approval of MWDWP and C.E.	PMI	\$4,905.62
				<hr/> <hr/> <u>\$599,836.20</u>

Approved Payments

66001793

660216

RON'S NSC INC.

<u>Date Approved</u>	<u>Amount</u>
7 /29/2020	\$33,719.38
1 /27/2021	\$14,953.32
6 /30/2021	\$9,269.81
10/26/2022	\$24,638.05
4 /26/2023	\$289,002.22
10/25/2023	\$5,304.72
	<hr/>
	\$376,887.50
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APPLICATION FOR REIMBURSEMENT
from the
PETROLEUM STORAGE TANK TRUST FUND

(1) ADEQ Facility Identification Number: 66001793

(2) Responsible Party Information:

Company Name Family Stops USA, LLC

Contact Person Jonathan Griffin

Address 8405 S. Zero Street, Suite C

City and State Fort Smith, AR

Zip Code 72903

Phone 479-308-2161

(3) Release Location

Facility Name Rons NSC Inc. (Pic-N-Tote #9)

Address 5114 Rye Hill Road East

City and State Fort Smith, 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 2/14/2019 Release (LUST) Number 66-0216

Facility ID# 66001793
Date 02/19/24

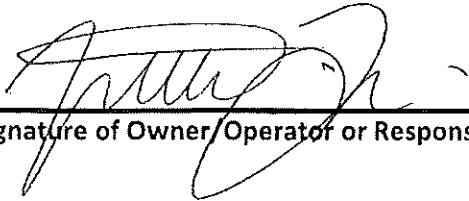
CERTIFICATION

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

Family Stops USA LLC

Jonathan Griffin

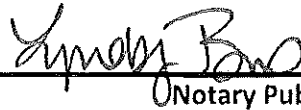
Type/Print name of Owner/Operator or Responsible Party



Signature of Owner/Operator or Responsible Party

ACKNOWLEDGEMENT

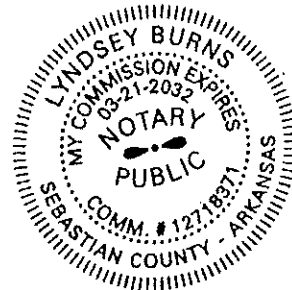
Sworn to and subscribed before me this 9 day of April, 2024.



Notary Public

My Commission Expires:

3-21-32



Facility ID# 66001793

Date 02/19/24

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 Family Stops USA, LLC for the invoices contained in this reimbursement request:

Invoice Number	Invoice Date	Invoice Amount
50431	6/30/2023	\$1,449.76
TK04640	9/26/2023	\$3,481.25
TK04686	9/26/2023	\$791.59
TK32911	11/20/2024	\$6,243.14
TK51270	12/27/2023	\$3,688.38
TK74176	2/19/2024	\$500.00
Total		\$16,154.12

Signed this 12 day of April, 2024

R. Davis

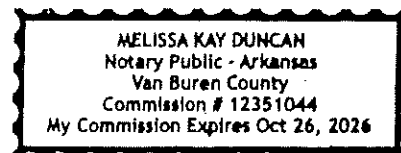
Richard T. Davis, Principal

ACKNOWLEDGEMENT

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

Melissa Kay Duncan
Notary Public

My Commission Expires: 10-26-2026



Interim Request No.	7F	COST SUMMARY SHEET			
Consultant /Responsible Party:		Family Stops USA LLC			
Facility Identification #:		66001793	Facility Name: Rons NSC Inc. (Pic-N-Tote #9)		
Dates current costs incurred:	From	05/10/23	to	02/19/24	Request Date: 02/19/24
COST SUMMARY					
1. DIRECT LABOR COST (attach labor recap)		Hours	Actual Cost		
Principal/Managerial		0.00	\$0.00		
Professional/Technical		95.50	\$3,115.60		
Support		23.00	\$597.53		
Totals		118.50	\$3,713.13		
Total Actual Labor Costs x 3					\$11,139.39
2. FIXED RATE COSTS (List by category - attach recap)				Actual Cost	
Equipment Rental				\$120.00	
Per Diem (meals only, with documented overnight stay)				\$0.00	
Mileage				\$638.40	
Other				\$0.00	
Total Fixed Rate Costs					\$758.40
3. OTHER DIRECT COSTS (List by category - attach recap)				Actual Cost	
Lodging				\$0.00	
Laboratory				\$1,870.00	
Subcontracts				\$5.30	
Supplies				\$127.89	
Other				\$1,127.08	
Total Other Direct Costs					\$3,130.27
4. Reimbursement Preparation Cost for RA#(s) <u>7F</u>				(\$500 or \$1000)	\$500.00
5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)					\$15,528.06
6. Markup on Total Other Direct Costs (maximum 20%)					\$626.06
7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)					\$16,154.12
A. Total Reimbursement Requested to Date Including Above:					\$401,081.62
B. Less Amount Deductible (\$25,000, \$15,000, or \$7,500)					\$7,500.00
C. Less Amount Previously Retained/Disallowed by RST:					\$540.00
D. Less Amount Previously Received (Reimbursed by ADEQ):					\$376,887.50
E. Amount of this Request (same as line 7 above unless it is the 1st Request):					\$16,154.12

Interim Request No.	7F	Page	5	of	16
Consultant /Responsible Party:	Family Stops USA LLC				
Facility Identification #	66001793	Facility Name:	Rons NSC Inc. (Pic-N-Tote #9)		
Dates costs incurred:	From	05/10/23	to	02/19/24	Request date: 02/19/24

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
PROFESSIONAL/TECHNICAL:						
06/05/23	50431	Greg L. Wells	Task 4	1.00	\$46.19	\$46.19
06/19/23	50431	Greg L. Wells	Task 4	0.50	\$46.19	\$23.10
06/16/23	50431	James D. Johnson	Task 4	1.50	\$21.64	\$32.46
06/27/23	50431	James D. Johnson	Task 4	2.00	\$21.64	\$43.28
06/28/23	50431	James D. Johnson	Task 4	8.50	\$21.64	\$183.94
06/29/23	50431	James D. Johnson	Task 4	3.50	\$21.64	\$75.74
06/30/23	50431	James D. Johnson	Task 4	1.00	\$21.64	\$21.64
07/12/23	TK04640	Greg L. Wells	Task 7	4.50	\$46.19	\$207.86
07/13/23	TK04640	Greg L. Wells	Task 7	2.50	\$46.19	\$115.48
07/14/23	TK04640	Greg L. Wells	Task 7	1.50	\$46.19	\$69.29
09/08/23	TK04686	Greg L. Wells	Task 4	1.00	\$51.63	\$51.63
07/19/23	TK04686	Greg L. Wells	Task 7	1.50	\$51.63	\$77.45
07/18/23	TK04686	Danny Lloyd	Task 7	2.00	\$28.30	\$56.60
10/23/23	TK32911	Greg L. Wells	Task 1	3.00	\$51.63	\$154.89
10/24/23	TK32911	Greg L. Wells	Task 1	1.00	\$51.63	\$51.63
10/25/23	TK32911	Greg L. Wells	Task 1	1.00	\$51.63	\$51.63
11/03/23	TK32911	James D. Johnson	Task 1	1.00	\$22.95	\$22.95
11/06/23	TK32911	James D. Johnson	Task 1	0.50	\$22.95	\$11.48
09/18/23	TK32911	James D. Johnson	Task 4	0.50	\$22.95	\$11.48
09/26/23	TK32911	James D. Johnson	Task 4	1.50	\$22.95	\$34.43
09/27/23	TK32911	James D. Johnson	Task 4	7.00	\$22.95	\$160.65
09/28/23	TK32911	James D. Johnson	Task 4	3.00	\$22.95	\$68.85
10/02/23	TK32911	Greg L. Wells	Task 7	3.00	\$51.63	\$154.89
10/03/23	TK32911	Greg L. Wells	Task 7	4.00	\$51.63	\$206.52
10/09/23	TK32911	Greg L. Wells	Task 7	2.00	\$51.63	\$103.26
10/10/23	TK32911	Greg L. Wells	Task 7	1.00	\$51.63	\$51.63
10/03/23	TK32911	Danny Lloyd	Task 7	2.00	\$28.30	\$56.60
10/25/23	TK32911	Stan Rasburry	TF Meeting	0.50	\$42.24	\$21.12
						\$0.00
						\$0.00
						\$0.00
						\$0.00
ADDITIONAL PROF/TECH COSTS (from the Extra Direct Labor Page):				33.50		\$948.97
TOTAL PROFESSIONAL/TECHNICAL COSTS:				95.50		\$3,115.60

Consultant /Responsible Party: Family Stops USA LLC

Facility Identification # 66001793 Facility Name: Rons NSC Inc. (Pic-N-Tote #9)

Dates costs incurred: From 05/10/23 to 02/19/24 Request date: 02/19/24

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
SUPPORT:						
07/05/23	TK04640	Erin Phelps	Task 7	2.50 ✓	\$22.89	\$57.23
07/12/23	TK04640	Erin Phelps	Task 7	3.50 ✓	\$22.89	\$80.12
07/19/23	TK04686	Erin Phelps	Task 7	2.00 ✓	\$27.07	\$54.14
10/24/23	TK32911	Erin Phelps	Task 1	3.00 ✓	\$27.07	\$81.21
09/29/23	TK32911	Erin Phelps	Task 7	2.00 ✓	\$27.07	\$54.14
10/09/23	TK32911	Erin Phelps	Task 7	5.00 ✓	\$27.07	\$135.35
10/10/23	TK32911	Erin Phelps	Task 7	1.00 ✓	\$27.07	\$27.07
12/07/23	TK51270	Erin Phelps	Task 4	3.00 ✓	\$27.07	\$81.21
12/14/23	TK51270	Erin Phelps	Task 4	1.00 ✓	\$27.07	\$27.07
						\$0.00
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ADDITIONAL SUPPORT COSTS (from the Extra Direct Labor Page):						
TOTAL SUPPORT COSTS:				23.00		\$597.53
TOTAL DIRECT LABOR COSTS:				118.50		\$3,713.13

Interim Request No.	7F	Page	7	of	16
Consultant /Responsible Party:	Family Stops USA LLC				
Facility Identification #	66001793	Facility Name:	Rons NSC Inc. (Pic-N-Tote #9)		
Dates costs incurred:	From	05/10/23	to	02/19/24	Request date: 02/19/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	VENDOR AND WORK PLAN TASK	UNITS	RATE	AMOUNT
EQUIPMENT RENTAL					
06/28/23	50431	PMI Interface Probe: Task 4	1	\$45.00	\$45.00 ✓
09/27/23	TK32911	PID Meter: Task 4	1	\$75.00	\$75.00 ✓
					\$0.00
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					\$0.00

ADDITIONAL EQUIPMENT RENTAL (from the Extra Fixed Rate Costs page):					
TOTAL EQUIPMENT RENTAL:					\$120.00

Interim Request No.	7F	Page	8	of	16
Consultant /Responsible Party:	Family Stops USA LLC				
Facility Identification #	66001793	Facility Name:	Rons NSC Inc. (Pic-N-Tote #9)		
Dates costs incurred:	From	05/10/23	to	02/19/24	Request date: 02/19/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	TRAVELER AND WORK PLAN TASK	# OF NIGHTS	RATE	AMOUNT
MEAL PER DIEM:					
					\$0.00
					\$0.00
					\$0.00
					\$0.00
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					\$0.00

ADDITIONAL MEAL PER DIEM COSTS (from the Extra Fixed Rate Costs page):	
TOTAL MEAL PER DIEM COSTS:	\$0.00

Interim Request No.	7F	Page	9	of	16
Consultant /Responsible Party:	Family Stops USA LLC				
Facility Identification #	66001793	Facility Name:	Rons NSC Inc. (Pic-N-Tote #9)		
Dates costs incurred:	From	05/10/23	to	02/19/24	Request date: 02/19/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	ROUTE AND WORK PLAN TASK	# OF MILES	RATE	AMOUNT
MILEAGE:					
06/28/23	50431	J Johnson: Task 4: Office-Site-Office	140.00	✓ \$0.70	\$98.00
09/27/23	TK32911	J Johnson: Task 4: Office-Site-Office	140.00	✓ \$0.70	\$98.00
09/28/23	TK32911	J Johnson: T4: To/From FedEx & Walmart	16.00	✓ \$0.70	\$11.20
11/29/23	TK51270	J Johnson: Task 2: Office-Site-Office	140.00	✓ \$0.70	\$98.00
11/30/23	TK51270	J Johnson: Task 2: Office-Site-Office	140.00	✓ \$0.70	\$98.00
12/01/23	TK51270	J Johnson: T3: Office-Future Energy:Office	336.00	✓ \$0.70	\$235.20
					\$0.00
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ADDITIONAL MILEAGE COSTS (from the Extra Fixed Rate Costs page):	\$0.00
TOTAL MILEAGE COSTS:	\$638.40

Interim Request No. 7F Page 10 of 16

Consultant /Responsible Party: Family Stops USA LLC

Facility Identification # 66001793 Facility Name: Rons NSC Inc. (Pic-N-Tole #9)

Dates costs incurred: From 05/10/23 to 02/19/24 Request date: 02/19/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	DESCRIPTION AND WORK PLAN TASK	AMOUNT
OTHER:			

ADDITIONAL OTHER FIXED RATE COSTS (from Extra Fixed Rate Costs page): \$0.00

TOTAL OTHER FIXED RATE COSTS: **\$0.00**

TOTAL FIXED RATE COSTS **\$758.40**

Consultant /Responsible Party: Family Stops USA LLC

Facility Identification # 66001793 Facility Name: Rons NSC Inc. (Pic-N-Tote #9)

Dates costs incurred: From 05/10/23 to 02/19/24 Request date: 02/19/24

OTHER DIRECT COSTS DETAIL

DATE	INVOICE#	DESCRIPTION AND WORK PLAN TASK	AMOUNT
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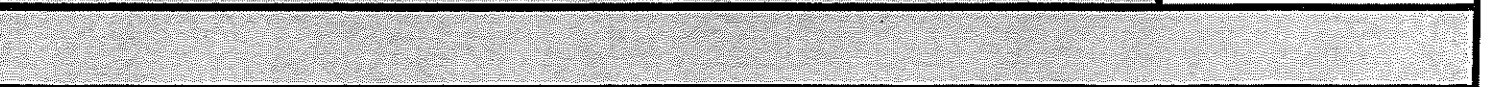
LABORATORY:

07/11/23	TK04640	Waypoint Analytical: Invoice 1221348: Task 5	\$935.00
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10/05/23	TK32911	Waypoint Analytical: Invoice 1227893: Task 5	\$935.00
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ADDITIONAL LABORATORY COSTS (from the Extra Other Direct Costs page):			\$0.00
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TOTAL LABORATORY COSTS:			\$1,870.00
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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

Family Stops USA
 8405 S Zero Street
 Suite C
 Fort Smith, AR 72903

Invoice Number: 50431

Date: 6/30/23

Billing Manager: Greg L. Wells

Client ID: FAMI

Brandon Richmond

Contract: FAMI-11472:
 TF - Pic N Tote #9: UST Services & Corrective Actions

TF - UST Services & Corrective Actions

Interim Job Billing
 Pick N Tote #9
 5114 Rye Hill Road East
 Fort Smith, AR 72916
 Facility ID:66001793
 Lust #: 66-0216

Labor

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>	
Greg L. Wells					
Coordinate Site Operations	Task 4 - Coordinate/schedule CAM sampling event #3. Order lab kits and related.	6/5/23	1.00 /	\$138.57	\$138.57
Coordinate Site Operations	Task 4 - Schedule CAM sampling activities and equipment rental.	6/19/23	0.50 /	\$138.57	\$69.29
Employee Subtotal			1.50	207.86	
James D. Johnson					
Field Services	TASK# 4 - order low flow rental equipment, check sample kit	6/16/23	1.50 /	\$64.92	\$97.38
Field Services	TASK# 4 - prep equipment and supplies for Low Flow sampling	6/27/23	2.00 /	\$64.92	\$129.84
Field Services	TASK# 4 - mobe from fayetteville ar to fort smith ar, conduct low flow sampling of monitor wells/ collect surface water samples/ gauge observation wells @ UST basin, mobe from fort smith ar to fayetteville ar	6/28/23	8.50 /	\$64.92	\$551.82
Field Services	TASK# 4 - prep samples and rental sampling equipment for shipping and deliver to fedex	6/29/23	3.50 /	\$64.92	\$227.22
Field Services	TASK# 4 - submit gauging and LOW FLOW data info	6/30/23	1.00 /	\$64.92	\$64.92
Employee Subtotal			16.50	1,071.18	
Labor Subtotal			18.00	1,279.04	
			Labor Total:	1,279.04	

Reimbursable

James Johnson					
Task 4: Ice for Samples	06302023JJ	6/30/23	1.00	6.04	6.04
Task 4: Ice and Sampling Supplies	06302023JJ	6/30/23	1.00	21.68	21.68
Reimbursable Subtotal				27.72	

Family Stops USA
8405 S Zero Street
Suite C
Fort Smith, AR 72903

Brandon Richmond

Contract: FAMI-11472:
TF - Pic N Tote #9: UST Services & Corrective Actions

Invoice Number: 50431
Date: 6/30/23
Billing Manager: Greg L. Wells
Client ID: FAMI

TF - UST Services & Corrective Actions
Interim Job Billing
Pick N Tote #9
5114 Rye Hill Road East
Fort Smith, AR 72916
Facility ID:66001793
Lust #: 66-0216

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>
PMI Equip				
James D. Johnson				
Interface Probe TASK# 4	6/28/23	1.00	45.00 ✓	45.00 ✓
2016 GMC Sierra Crew 240005 TASK# 4	6/28/23	140.00 ✓	0.70	98.00
				<hr/>
			PMI Equip Subtotal	143.00

Amount Due This Invoice

\$1,449.76

This invoice is due upon receipt



INVOICE

Fayetteville, AR
501-224-7122

Project Mgr: Greg Wells

Project: FAMI - TF - Pic-N-Tote #9
5114 Rye Hill Road East
Fort Smith, AR 72916

To: Family Stops USA LLC
Attn: Brandon Richmond
8405 S Zero St Ste C
Fort Smith, AR 72903

REMIT TO:	
Invoice Number: TK04640	
Pollution Management, Inc. PO Box 959673 St. Louis, MO 63195-9673	
Federal E.I.N.: 71-0668874	

Project Number:	KU237005
Invoice Date:	9/26/2023
For Period:	7/05/2023 to 7/31/2023

Quantity	Description of Services	Rate	Total
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TASK: Task 4

Direct Project Expenses

1.00	Item Date 7/1/23 - Peri-Pump Equipment Rental Pine Environmental Serv, LLC: Invoice #US1-230046028	\$488.10	\$488.10
		Subtotal	\$488.10
		Task Total	\$488.10

TASK: Task 5

Direct Project Expenses

1.00	Item Date 7/6/23 - Shipping FedEx Invoice:8-184-38326	\$135.10	\$135.10
1.00	Item Date 7/6/23 - Shipping FedEx Invoice:8-184-38326	\$146.16	\$146.16
1.00	Item Date 7/11/23 - Water Samples Waypoint Analytical Invoice #1221348	\$1,122.00	\$1,122.00
		Subtotal	\$1,403.26
		Task Total	\$1,403.26

TASK: Task 7

Direct Project Expenses

2.50	Item Date 7/5/23 - Prepare Report - Erin Phelps Task 7: Prepare CAM #3 and Attachments	\$68.67	\$171.68
3.50	Item Date 7/12/23 - Prepare Report - Erin Phelps Task 7: CAMR #3	\$68.67	\$240.35

TERMS: DUE UPON PRESENTATION OF INVOICE



INVOICE

Invoice No.: TK04640
 Project No.: KU237005
 Project: FAMI - TF - Pic-N-Tote #9
 5114 Rye Hill Road East
 Fort Smith, AR 72916

Project Mgr: Greg Wells

Quantity	Description of Services	Rate	Total
Continued			
TASK: Task 7			
Direct Project Expenses			
4.50 /	Item Date 7/12/23 - Prepare Report - Greg Wells Task 7: Compile Data and Prepare CAM Report #3	\$138.57	\$623.57
2.50 /	Item Date 7/13/23 - Prepare Report - Greg Wells Task 7: Compile Data and Prepare CAM Report #3	\$138.57	\$346.43
1.50 /	Item Date 7/14/23 - Prepare Report - Greg Wells Task 7: Compile Data and Prepare CAM Report #3	\$138.57	\$207.86
		Subtotal	\$1,589.89
		Task Total	\$1,589.89

Pic-N-Tote #9
 Facility ID: 66001793
 LUST: 66-0216

Invoice Total \$3,481.25



INVOICE

Fayetteville, AR
501-221-7122

Project Mgr: Greg Wells

Project: FAMI - TF - Pic-N-Tote #9
5114 Rye Hill Road East
Fort Smith, AR 72916

To: Family Stops USA LLC
Attn: Brandon Richmond
8405 S Zero St Ste C
Fort Smith, AR 72903

REMIT TO:
Invoice Number: TK04686
Pollution Management, Inc. PO Box 959673 St. Louis, MO 63195-9673
Federal E.I.N.: 71-0668874

Project Number:	KU237005
Invoice Date:	9/26/2023
For Period:	7/09/2023 to 9/16/2023

Quantity	Description of Services	Rate	Total
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TASK: Task 4

Direct Labor Costs

1.00 Hour(s)	Item Date 9/8/23 - Senior Geologist - Greg Wells Task 4: Coordinate/schedule CAM #4 sampling & related. Order sample kits and field rental equipment.	\$51.63	\$51.63
	3 Times Hourly Rate		
		Total Labor	\$51.63
		Subtotal	\$154.89
		Task Total	\$154.89

TASK: Task 7

Direct Labor Costs

1.50 Hour(s)	Item Date 7/19/23 - Senior Geologist - Greg Wells Task 7: Complete/distribute CAM Report #3.	\$51.63	\$77.45
2.00 Hour(s)	Item Date 7/18/23 - Environmental Technician III - Danny Lloyd Task #7 CAM Report Drawings	\$28.30	\$56.60
2.00 Hour(s)	Item Date 7/19/23 - Staff Scientist - Erin Phelps Task 7.2 - Compile/Review/Edit/Copy/Bind/Preparecover letters/Create pdf-CD-R/Distribute CAM Report #3	\$27.07	\$54.14
	3 Times Hourly Rate		
		Total Labor	\$188.19
		Subtotal	\$564.57

Direct Project Expenses

\$60.11 Cost+	Item Date 7/27/23 - Postage / Freight FedEx; Inv# 8-205-43184..FedEx Express Services	20%	\$72.13
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TERMS: DUE UPON PRESENTATION OF INVOICE



INVOICE

Invoice No.: TK04686
Project No.: KU237005
Project: FAMI - TF - Pic-N-Tote #9
5114 Rye Hill Road East
Fort Smith, AR 72916

Project Mgr: Greg Wells

Quantity	Description of Services	Rate	Total
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Continued

TASK: Task 7

Direct Project Expenses

FedEx; Inv# 8-205-43184..FedEx Express Services

Subtotal \$72.13

Task Total \$636.70

Pic-N-Tote #9
Facility ID: 66001793
LUST: 66-0216

Invoice Total \$791.59

TERMS: DUE UPON PRESENTATION OF INVOICE



INVOICE

Fayetteville, AR
501-221-7122

Project Mgr: Greg Wells

Project: FAMI - TF - Pic-N-Tote #9
5114 Rye Hill Road East
Fort Smith, AR 72916

To: Family Stops USA LLC
Attn: Brandon Richmond
8405 S Zero St Ste C
Fort Smith, AR 72903

REMIT TO:	
Invoice Number: TK32911	
Pollution Management, Inc. PO Box 959673 St. Louis, MO 63195-9673	
Federal E.I.N.: 71-0668874	

Project Number:	KU237005
Invoice Date:	11/20/2023
For Period:	9/17/2023 to 11/11/2023

Quantity	Description of Services	Rate	Total
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TASK: Task 1

Direct Labor Costs

3.00 Hour(s)	Item Date 10/23/23 - Senior Geologist - Greg Wells Task 1 - Compile info and prepare work plan documents.	\$51.63	\$154.89
1.00 Hour(s)	Item Date 10/24/23 - Senior Geologist - Greg Wells Task 1 - Compile info and prepare work pan documents.	\$51.63	\$51.63
1.00 Hour(s)	Item Date 10/25/23 - Senior Geologist - Greg Wells Task 1: Complete/distribute work plan for well decomm.	\$51.63	\$51.63
3.00 Hour(s)	Item Date 10/24/23 - Staff Scientist - Erin Phelps TASK 1 - Compile/Edit/Format text and cost tables - Copy/Bind/Create pdf-CD-R/Prepare cover letters/Distribute MW Decom Work Plan	\$27.07	\$81.21
1.00 Hour(s)	Item Date 11/3/23 - Environmental Technician III - James Johnson solicit pricing/quotes from vendors	\$22.95	\$22.95
0.50 Hour(s)	Item Date 11/6/23 - Environmental Technician III - James Johnson Obtain vendor pricing/quote.	\$22.95	\$11.48
		Total Labor	\$373.79

3 Times Hourly Rate

Subtotal \$1,121.37
Task Total \$1,121.37

TASK: Task 4

Direct Labor Costs

0.50 Hour(s)	Item Date 9/18/23 - Environmental Technician III - James Johnson order Low Flow sampling Equipment TASK#4	\$22.95	\$11.48
1.50 Hour(s)	Item Date 9/26/23 - Environmental Technician III - James Johnson Check sample kit, pickup rental pump and water quality meter, prep equipment and supplies (TASK#4)	\$22.95	\$34.43

TERMS: DUE UPON PRESENTATION OF INVOICE



INVOICE

Invoice No.: TK32911
 Project No.: KU237005
 Project: FAMI - TF - Pic-N-Tote #9
 5114 Rye Hill Road East
 Fort Smith, AR 72916

Project Mgr: Greg Wells

Quantity	Description of Services	Rate	Total
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Continued

TASK: Task 4

Direct Labor Costs

✓ 7.00 Hour(s)	Item Date 9/27/23 - Environmental Technician III - James Johnson	\$22.95	\$160.65
	Travel from Fayetteville AR to Fort Smith AR. Gauge all wells. Conduct Low Flow sampling of Mw's 2R, 3R, and 4R. Collect surface water sample. Travel from Fort Smith AR to Fayetteville AR. TASK# 4		
✓ 3.00 Hour(s)	Item Date 9/28/23 - Environmental Technician III - James Johnson	\$22.95	\$68.85
	Purchase misc. sampling supplies and ice. Prep Samples for shipping. Prep rental equipment for return shipping. Deliver samples and rental equipment to FedEx. Submit Data TASK#4		
		Total Labor	\$275.41
	3 Times Hourly Rate		
		Subtotal	\$826.23

Direct Project Expenses

✓ 140.00 Mile(s)	Item Date 9/27/23 - Company Mileage	\$0.700	\$98.00
	JJ: Travel from Fayetteville AR to Fort Smith AR to Fayetteville AR TASK# 4		
✓ 1.00 Each	Item Date 9/27/23 - PID Meter	\$75.00 ✓	\$75.00 ✓
	PID Meter		
\$15.09 Cost+	Item Date 9/27/23 - Project Supplies & Equipment (503 x 3): 1509	20%	\$18.11
	Pic-N-Tote #9 27-SEP-23 010062042453 01006204245300020000 Johnson, James ice		
	Picntote 27-SEP-23 010062042453 01006204245300040000 Johnson, James ice		
	Pic 27-SEP-23 010062042453 01006204245300030000 Johnson, James ice		
	Pic-N-Tote 27-SEP-23 010062510463 01006251046300010000 Johnson, James Correct Expense Report that was submitted for \$10.25 instead of \$5.03.		
	Pic-n-Tote 27-SEP-23 010062510583 01006251058300010000 Johnson, James ice		
✓ 16.00 Mile(s)	Item Date 9/28/23 - Company Mileage	\$0.700	\$11.20
	JJ: Travel to and from FedEx and trip to Walmart to purchase misc. supplies and ice. TASK#4		
\$23.73 Cost+	Item Date 9/28/23 - Project Supplies & Equipment	20%	\$28.48
	Walmart 28-SEP-23 010062042453 01006204245300010000 Johnson, James ice and misc.		
\$425.84 Cost+	Item Date 9/30/23 - Equipment Rental	20%	\$511.01
	Pine Environmental Services LLC; Inv# US1-230068188..Low-flow Sampling equipment rental		
		Subtotal	\$741.80
		Task Total	\$1,568.03

TASK: Task 5

Direct Project Expenses

✓ \$935.00 Cost+	Item Date 10/5/23 - Contract Lab Services	20%	\$1,122.00
	Waypoint Analytical; Inv# 1227893..11472 FACILITY		

TERMS: DUE UPON PRESENTATION OF INVOICE



INVOICE

Invoice No.: TK32911
 Project No.: KU237005
 Project: FAMI - TF - Pic-N-Tote #9
 5114 Rye Hill Road East
 Fort Smith, AR 72916

Project Mgr: Greg Wells

Quantity	Description of Services	Rate	Total
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Continued

TASK: Task 5

Direct Project Expenses

Subtotal \$1,122.00
Task Total \$1,122.00

TASK: Task 7

Direct Labor Costs

✓ 3.00 Hour(s) Item Date 10/2/23 - Senior Geologist - Greg Wells Compile data and prepare CAM report drawings and related.	\$51.63	\$154.89
✓ 4.00 Hour(s) Item Date 10/3/23 - Senior Geologist - Greg Wells Prepare CAM Report #4.	\$51.63	\$206.52
✓ 2.00 Hour(s) Item Date 10/9/23 - Senior Geologist - Greg Wells Task 7: Compile data and prepare CAM Report #4.	\$51.63	\$103.26
✓ 1.00 Hour(s) Item Date 10/10/23 - Senior Geologist - Greg Wells Task 7: Complete/distribute CAM Report #4.	\$51.63	\$51.63
✓ 2.00 Hour(s) Item Date 10/3/23 - Environmental Technician III - Danny Lloyd Prepare CAM #4 Report Drawings and Maps, Plot to PDF and Place in Project File	\$28.30	\$56.60
✓ 2.00 Hour(s) Item Date 9/29/23 - Staff Scientist - Erin Phelps TASK 7 - Compile/Review/Scan GW Gauging data & low-flow sampling field sheets - Format data tables - Gauging data entry for CAMR #4	\$27.07	\$54.14
✓ 5.00 Hour(s) Item Date 10/9/23 - Staff Scientist - Erin Phelps TASK 7 - Compile/Review GW analytical data - Format table - Quarterly GW analytical data entry for CAMR #4 TASK 7 - Tabulate quarterly analytical and site data to date - Prepare CAMR #4	\$27.07	\$135.35
✓ 1.00 Hour(s) Item Date 10/10/23 - Staff Scientist - Erin Phelps TASK 7 - Compile/Review/Format text - Prepare pdf, CD-R and cover letters - Copy/Bind/Distribute CAMR #4	\$27.07	\$27.07

Total Labor \$789.46

3 Times Hourly Rate

Subtotal \$2,368.38

Task Total \$2,368.38

TASK: Trust Fund Meeting

Direct Labor Costs

✓ 0.50 Hour(s) Item Date 10/25/23 - Senior Geologist - Stan Rasburry Present project status report for reimbursement application at monthly RST Trust Fund meeting	\$42.24	\$21.12
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TERMS: DUE UPON PRESENTATION OF INVOICE



INVOICE

Invoice No.: TK32911
 Project No.: KU237005
 Project: FAMI - TF - Pic-N-Tote #9
 5114 Rye Hill Road East
 Fort Smith, AR 72916

Project Mgr: Greg Wells

Quantity	Description of Services	Rate	Total
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Continued

TASK: Trust Fund Meeting

3 Times Hourly Rate

Total Labor \$21.12

Subtotal \$63.36

Task Total \$63.36

Pic-N-Tote #9
 Facility ID: 66001793
 LUST: 66-0216

Invoice Total \$6,243.14



INVOICE

Fayetteville, AR
501-221-7122

Project Mgr: Greg Wells

Project: FAMI - TF - Pic-N-Tote #9
5114 Rye Hill Road East
Fort Smith, AR 72916

REMIT TO:	
Invoice Number: TK51270	
Pollution Management, Inc. PO Box 959673 St. Louis, MO 63195-9673	
Federal E.I.N.: 71-0668874	

To: Family Stops USA LLC
Attn: Brandon Richmond
8405 S Zero St Ste C
Fort Smith, AR 72903

Project Number:	KU237005
Invoice Date:	12/27/2023
For Period:	11/12/2023 to 12/16/2023

Quantity	Description of Services	Rate	Total
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TASK: Task 2

Direct Labor Costs

1.00 Hour(s)	Item Date 11/27/23 - Senior Geologist - Greg Wells Task 2: Coordinate and schedule MW and vapor pin decommissioning activities.	\$51.63	\$51.63
3.00 Hour(s)	Item Date 11/28/23 - Environmental Technician III - James Johnson Prep field equipment and supplies	\$22.95	\$68.85
10.00 Hour(s)	Item Date 11/29/23 - Environmental Technician III - James Johnson James: Travel from Fayetteville AR to Fort Smith AR. Conduct decommissioning of monitor wells and vapor wells	\$22.95	\$229.50
5.00 Hour(s)	Item Date 11/30/23 - Environmental Technician III - James Johnson James: Travel from Fayetteville AR to Fort Smith AR. Misc. cleanup / photos / pickup cones. Travel from Fort Smith AR to Fayetteville AR	\$22.95	\$114.75

Total Labor \$464.73

3 Times Hourly Rate

Subtotal \$1,394.19

Direct Project Expenses

\$65.97 Cost+	Item Date 11/28/23 - Project Supplies & Equipment Lowes 28-NOV-23 010063351034 01006335103400010000 Johnson, James Concrete/Masonry cement to plug wells TASK# 2	20%	\$79.16
140.00 Mile(s)	Item Date 11/29/23 - Company Mileage James: Travel from Fayetteville AR to Fort Smith AR to Fayetteville AR	\$0.700	\$98.00
140.00 Mile(s)	Item Date 11/30/23 - Company Mileage James: Travel from Fayetteville AR to Fort Smith AR to Fayetteville AR	\$0.700	\$98.00

Subtotal \$275.16

Task Total \$1,669.35

TERMS: DUE UPON PRESENTATION OF INVOICE



INVOICE

Invoice No.: TK51270
 Project No.: KU237005
 Project: FAMI - TF - Pic-N-Tote #9
 5114 Rye Hill Road East
 Fort Smith, AR 72916

Project Mgr: Greg Wells

Quantity	Description of Services	Rate	Total
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Continued

TASK: Task 3

Direct Labor Costs

8.00 Hour(s)	Item Date 12/1/23 - Environmental Technician III - James Johnson James: Travel from Fayetteville AR to Damascus AR. Dispose of fluids from monitor wells. Travel from Damascus AR to Fayetteville AR. Submit data	\$22.95	\$183.60
		Total Labor	\$183.60
	3 Times Hourly Rate		
		Subtotal	\$550.80

Direct Project Expenses

336.00 Mile(s)	Item Date 12/1/23 - Company Mileage James: Travel from Fayetteville AR to Damascus AR to Fayetteville AR	\$0.700	\$235.20
\$5.30 Cost+	Item Date 12/8/23 - Contract Labor Future Energy Services of Oklahoma Inc; Inv# 126252. Dispose of 10 gallons petroleum-contaminated water	20%	\$6.36
		Subtotal	\$241.56
		Task Total	\$792.36

TASK: Task 4

Direct Labor Costs

1.00 Hour(s)	Item Date 12/1/23 - Senior Geologist - Greg Wells Task 4: Preparing MW Decomm report docs.	\$51.63	\$51.63
1.50 Hour(s)	Item Date 12/13/23 - Senior Geologist - Greg Wells Task 4: Compiling info and preparing MW Decomm report.	\$51.63	\$77.45
2.50 Hour(s)	Item Date 12/14/23 - Senior Geologist - Greg Wells Task 4: Complete and distribute MW Decommissioning Rpt.	\$51.63	\$129.08
1.50 Hour(s)	Item Date 12/5/23 - Environmental Technician III - Danny Lloyd Task #4 Prepare MW Decommissioning Report Drawings	\$28.30	\$42.45
3.00 Hour(s)	Item Date 12/4/23 - Staff Scientist - Erin Phelps TASK 1 - Compile/format site photos-Prepare photo attachmentsPrepare/format MW Decommissioning Report and attachments	\$27.07	\$81.21
1.00 Hour(s)	Item Date 12/14/23 - Staff Scientist - Erin Phelps TASK 4 - Compile/Format/Create pdf/CD-R/Prepare cover letters - Distribute final MW Decommissioning Report	\$27.07	\$27.07
		Total Labor	\$408.89
	3 Times Hourly Rate		
		Subtotal	\$1,226.67

TERMS: DUE UPON PRESENTATION OF INVOICE



INVOICE

Invoice No.: TK51270
 Project No.: KU237005
 Project: FAMI - TF - Pic-N-Tote #9
 5114 Rye Hill Road East
 Fort Smith, AR 72916

Project Mgr: Greg Wells

Quantity	Description of Services	Rate	Total
Continued			
		Task Total	\$1,226.67

Pic-N-Tote #9
 Facility ID: 66001793
 LUST: 66-0216

Invoice Total \$3,688.38



INVOICE

Fayetteville, AR
501-221-7122

Project Mgr: Greg Wells

Project: FAMI - TF - Pic-N-Tote #9
5114 Rye Hill Road East
Fort Smith, AR 72916

To: Family Stops USA LLC
Attn: Brandon Richmond
8405 S Zero St Ste C
Fort Smith, AR 72903

REMIT TO:
Invoice Number: TK74176
Pollution Management, Inc.
PO Box 959673
St. Louis, MO 63195-9673
Federal E.I.N.: 71-0668874

Project Number:	KU237005
Invoice Date:	2/19/2024
For Period:	12/17/2023 to 2/10/2024

Quantity	Description of Services	Rate	Total
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TASK: General

Direct Project Expenses

1.00	App #7 & Final Preparation Fee	\$500.00	\$500.00
		Subtotal	\$500.00
		Task Total	\$500.00

Pic-N-Tote #9
Facility ID: 66001793
LUST: 66-0216

Invoice Total **\$500.00**

TERMS: DUE UPON PRESENTATION OF INVOICE



ARKANSAS
ENERGY & ENVIRONMENT

MEMORANDUM

To: *Bridget Green 5/7/24*
Jacqueline Trotta, Trust Fund Administrator
Assessment & Remediation Program, Office of Land Resources

Through: Blake Whittle, P.G., Groundwater Branch Manager *BW 5/8/24*
Joshua Stevens, P.G., Geologist Supervisor, Regulated Storage Tanks *JS 5/11/24*
A & R Program, OLR

From: Mikel R. Shinn, Professional Geologist *M.R.S.*
RST, A & R Program, OLR

Date: April 29, 2024

Subject: Technical Review of Reimbursement Application #7
For Time Period: May 10, 2023 – February 19, 2024
Amount Requested: \$16,154.12
Former Ron's NSC ["Family Stops USA, LLC"]
5114 Rye Hill Road East
Fort Smith, AR 72335
ID# 66001793 LUST# 66-0216 AFIN# 66-01400

The following is in response to your memo to me dated April 17, 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?*

LUST Case #66-0216 was closed by OLR RST with a "No Further Action" letter on December 29, 2023, following a year of post-remediation monitoring and the submittal of a *Monitoring Well Decommissioning Report* on December 18, 2023.

- 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.*

In a 9/16/21 *Exposure Assessment*, the following clean-up goals were established:

- To remove free product to the maximum extent practicable, by reducing concentrations of petroleum contamination in soil to not more than 72 mg/kg TPH-GRO, throughout the contaminated area, with points of compliance located throughout the area.

- To prevent the discharge of contaminated ground water into the waters of the State. The effectiveness of environmental protection shall be verified by the attainment of USEPA Region 4 Surface Water Quality Chronic Screening Values (CSVs) for the following constituents of concern, with points of compliance at the surface water discharge point and in monitoring wells MW-2, MW-3 and MW-4 (or in replacements for those wells):

Constituents of Concern	USEPA Region 4 CSV (µg/L)
Benzene	160
Toluene	62
Ethylbenzene	61
Xylenes (total)	27
Naphthalene	21
1,2,4 Trimethylbenzene	15
1-Methylnaphthalene	6.1
2-Methylnaphthalene	4.7

- 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 Corrective Action Plan implementation in October-November 2022, 910.26 tons of concrete and contaminated soils were disposed at the City of Fort Smith Landfill. A total of 64.85 tons of liquefied wastes were disposed at the WMI Eco-Vista Landfill in Tontitown, Arkansas. A total of 9,200 gallons of waste water were disposed at the Waste Water Specialties facility in Conway, Arkansas.

During monitoring well decommissioning activities performed on December 1, 2023, a total of 10 gallons of contaminated groundwater were disposed at the Future Energy Services facility in Damascus, Arkansas.

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.*
- Implementation of the *Corrective Action Plan* approved in the final amount of **\$518,901.83**. During this reimbursement period, Corrective Action Monitoring Events #3 and #4 were conducted and reported.
 - Preparation and implementation of the *Monitoring Well Decommissioning Work Plan and Cost Estimate* submitted by Pollution Management, Inc. on October 25, 2023 and approved in the amount of **\$4,905.62** by OLR RST on November 27, 2023.
 - Preparation of this (final) reimbursement application (**\$500.00**).
- b) *Identify any activity that may conflict with Rule 12 or that was not pre-approved by the technical staff.*

No activity conflicts with Rule 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.*

PMI 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.*

PMI has included a general site plan map from the *Monitoring Well Decommissioning Report* which shows the locations of the plugged monitoring wells.

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

No additional data or graphs have been generated.



A **Terracon** Company

RECEIVED

APR 17 2024

DEQ - RST

3512 S. Shackelford Road,
Little Rock, AR 72205

(501) 221-7122

PMICO.com | Terracon.com

April 12, 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 #7 & Final
Pic-N-Tote #9
5114 Rye Hill Road East
Fort Smith, AR
Facility ID: 66001793

LUST #: 66-0216

AFIN: 66-001400

Dear Ms. Trotta:

Enclosed please find the Seventh and Final Application for Reimbursement under the Arkansas Petroleum Storage Tank Trust Fund Act which is being submitted on behalf of Family Stops USA, LLC.

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 Manger

Enclosure: Application #7F

Cc: Jonathan Griffin
Job #: FAMI-11472: KU237005

Explore with us

**TRUST FUND PROJECT
STATUS REPORT #7 (FINAL)**

Pic-N-Tote #9
(Former Ron's NSC)
5114 Rye Hill Road East
Fort Smith, Arkansas
Sebastian County
Facility ID #66001793 LUST Case #66-0216

Period of May 10, 2023 through February 19, 2024

Project Summary & Reimbursable Activities:

The DEQ previously initiated Leaking Underground Storage Tank (LUST) Case #66-0216 in February of 2019 based on information and analytical data provided in a pre-transactional Phase II environmental site assessment report. That report identified apparent free product gasoline in an assessment soil boring, and petroleum contaminant concentrations in groundwater samples which exceeded DEQ action levels.

The case was referred for review by RST technical staff on February 19, 2019, and the facility was determined to be trust fund eligible on February 28, 2019. A *Preliminary Assessment* document was completed by DEQ on March 15, 2019 and recommended "comprehensive investigations for soil and groundwater clean-up" in accordance with 40 CFR 280.65.

In the interim, various levels of site assessment were completed through January of 2021 and have included: drilling and installation of twelve (12) soil borings and eight (8) groundwater monitoring wells, installation of three (3) sub-slab vapor pins inside the store building, professional surveying, laboratory analysis of soil, air and water samples and handling and disposal of the associated waste media. The assessments identified free product gasoline in shallow soils near the pump islands, and impacted surface waters in a nearby drainage ditch.

Following review of an *Additional Site Assessment Report* dated January 5, 2021 and other related information, the DEQ completed an *Exposure Assessment (EA)* for the facility. The September 16, 2021 Exposure Assessment described the case development, outlined the DEQ's regulatory interests, and proposed specific goals for a solution.

The DEQ risk assessment identified certain human health and ecological exposures and the presence of free product in need of recovery. In a September 17, 2021 correspondence, the DEQ cited 40 CFR § 280.64 and requested development of a formal Corrective Action Plan (CAP) and cost estimate to meet the goals expressed in the Exposure Assessment.

A CAP dated May 16, 2022 was prepared and submitted for DEQ review. On June 22, 2022, a revised CAP Cost Estimate was requested via email correspondence, and was submitted that same date. The CAP and revised cost estimates were conditionally approved with submittal of proof of publication of the CAP public notice requested on or before July 22, 2022.

The corrective action field work was initiated during October of 2022 and included excavation and removal of petroleum-contaminated soils using a combination of mechanical excavation and hydro-excavation, restoration of the excavated areas and a storm water culvert, drilling and installation of replacement point-of-compliance monitoring wells within the restored area, and submittal of a *Corrective Action Report* dated December 15, 2022.

In accordance with the approved CAP, PMI implemented a post-remedial, corrective action monitoring program. The quarterly monitoring activities were initiated in January of 2023 and completed in October of 2023.

The monitoring and reporting included collection of water samples from three (3) monitoring wells and a surface water location, analysis of the samples for CAP-specific petroleum chemicals of concern and handling and disposal of the associated wastes. CAM Reports #1 and #2 were completed and submitted for DEQ review on January 13, 2023 and April 20, 2023, respectively.

The current activities included sampling and reporting for CAM events #3 and #4 which were completed on July 19, 2023 and October 10, 2023, respectively. In a subsequent October 18, 2023 correspondence, the DEQ requested submittal of a work plan and cost estimate for decommissioning all groundwater monitoring wells and sub-slab vapor pins prior to closure of Leaking Underground Storage Tank (LUST) Case #66-0216.

A "Monitoring Well Decommissioning Work Plan and Cost Estimate" was submitted to the DEQ on October 24, 2023. The work plan was approved for implementation on November 27, 2023, with submittal of a report documenting the well decommissioning activities requested on or before December 29, 2023.

The four (4) remaining groundwater monitoring wells and three (3) sub-slab vapor pins were decommissioned on November 29, 2023, and the associated liquid wastes were disposed on December 1, 2023.

A "Monitoring Well Decommissioning Report" dated December 14, 2023 was completed and submitted for DEQ review. Following staff reviews, LUST Case #66-0216 was closed by an Agency letter of "No Further Action" (NFA) on December 29, 2023.

In summary, the activities included in this final reimbursement application and six (6) PMI invoices are as follows:

- Quarterly sampling and reporting - CAM Report #3;
- Quarterly sampling and reporting - CAM Report #4
- Preparation of a work plan for monitoring well decommissioning;
- Decommissioning of all wells and vapor pins, and submittal of final report documenting those activities.

Summary of Work Plan Billing:

Work Plan Approved Amount:	\$511,501.04
Change Order #1	\$7,400.79
Total amount approved:	\$518,901.83
Previously Reimbursed for Work Plan:	\$318,944.99
Included in Current Application:	\$16,154.12

PMI Invoice 50431 06/30/23

Task 4: Travel, conduct groundwater gauging and low-flow sampling activities for CAM report #3.

PMI Invoice TK04640 09/26/23

- Task 4: Equipment rental for low-flow sampling activities for CAM report #3.
- Task 5: FedEx shipping and laboratory analysis for CAM #3 reporting.
- Task 7: Preparation of CAM Report #3.

PMI Invoice TK04686 09/26/23

- Task 4: Coordinate low-flow sampling activities for CAM report #4.
- Task 7: Preparation and distribution of CAM Report #3, FedEx document shipping for same.

PMI Invoice TK32911 11/20/23

- Task 1: Prepare and distribute work plan for monitoring well decommissioning.
- Task 4: Obtain rental equipment, travel and conduct groundwater gauging and low-flow sampling activities for CAM report #4. FedEx shipping expenses for the same activities.
- Task 5: Laboratory analysis for CAM report #4.
- Task 7: Preparation, completion and distribution of CAM Report #4.

PMI Invoice TK51270 12/27/23

- Task 2: Travel and complete approved monitoring well decommissioning activities.
- Task 3: Travel and dispose of associated waste fluids through a disposal vendor.
- Task 4: Prepare and distribute Monitoring Well Decommissioning Report.

Invoice TK74176 02/19/24

Prepare trust fund reimbursement application #7 and final.



LEGEND:

- SW-10 STORMWATER SURFACE SAMPLING LOCATION
- VP-1 SUB-SLAB VAPOR PIN LOCATION (PLUGGED AND DECOMMISSIONED 11/29/23)
- MW-1 MONITORING MONITORING WELL LOCATION (PLUGGED AND DECOMMISSIONED 11/29/23)
- OW-1 OBSERVATION WELL LOCATION
- BM BENCH MARK LOCATION
- UE UNDERGROUND ELECTRIC LINE
- OE OVERHEAD ELECTRIC LINE
- FO FIBER OPTICS LINE
- WL WATER LINE
- CC COX CABLE
- PL PROPERTY LINE
- SS SEPTIC SYSTEM
- WM WATER METER

NOTE: BASE DRAWING WAS TAKEN FROM SITE SURVEY DATED 01/27/2020 DONE BY DAVID GLENN CARTER PE, PS

CIVIL ENGINEERING AND ENVIRONMENTAL SERVICES 3512 South Shackelford Road Little Rock, Arkansas 72205 (501) 221-7122 Fax (501) 221-7775	SUBMITTED: G. WELLS DRAWN: D. LLOYD CHECKED: G. WELLS DATE: DECEMBER 5, 2023	SCALE 	MONITORING WELL DECOMMISSIONING REPORT PIC-N-TOTE #9 (FORMER RON'S NSC) 5114 EYE HILL ROAD FORT SMITH, ARKANSAS	GENERAL SITE PLAN with DECOMMISSIONED MONITORING WELL LOCATIONS	JOB NUMBER FAMI-11472 DRAWING NO. 1
	FILE NO. PM162435800A-A-1VAMILY 310'S USAVAM-11072 - UST SERVICES - PIC N TOTE #9 WORK PLANS & REPORTS/REPORTS/15- WW DECOM REPORT - DEC 2023/FAM-11472 AMSCRPT.DWG				





**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: June 26, 2024

Subject: **Flash Market #10
710 Ingram Boulevard
West Memphis, AR 72301
ID #18000157 LUST #18-0096 AFIN 18-00729**

A request for reimbursement (#3) for costs incurred during remediation of an Underground Storage Tank (UST) site was received from the Responsible Party (RP) on May 16, 2024. The RP of this site reported a product release (#18-0096) on May 25, 2007, after receiving notification of product in the monitoring wells. The name and the address of the RP:

**Flash Market Inc.
Attn: Jamie Patterson
P.O. Box 2378
West Memphis, AR 72301**

The period covered by this application is September 22, 2023, through April 22, 2024. Remediation activities for which reimbursement is requested include: development and implementation of a 2nd Additional Site Assessment Work Plan, participation in the January 2024 Advisory Committee Meeting, and preparation of Reimbursement Application #3.

To date, an estimated 16 vapor-equivalent gallons of hydrocarbons and 2,230 gallons of contaminated groundwater was removed during an MDPE event. No solid waste has been generated.

This application includes one (1) invoice from SPATCO Energy Solutions (SPATCO) totaling **\$65,894.55**. Included in SPATCO's invoice(s) are charges from: FUTURE (\$8,165.61), McCray Drilling (\$5,581.70), Eurofins (\$5,069.00), NewGen (\$2,050.00), Samuel Smith Surveying (\$2,000.00), and GPRS (\$1,000.00).

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

RECOMMENDATION:

The claimed cost of **\$65,894.55** 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:

Claim filed- Form TF-1	\$ 65,894.55
Less: Deductible	- 00.00
Less: Adjustments	- <u>00.00</u>
Total Net Claim	<u>\$ 65,894.55</u>

It is recommended that the claim made by the RP be considered in the amount of **\$65,894.55**.

18000157-03 LUST #18-0096 BG, JT

Approved Work Plans

18000157 18-0096 FORMER FLASH MARKET #10

	<u>Date</u>			
	<u>Approved</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	09/30/2022	Request Limited Site Assessment	SPATCO	\$16,000.00
02	03/31/2023	Conditional Approval ASAWP & C.E.	SPATCO	\$83,777.42
03	06/27/2023	Change Order #1 ASAWP	SPATCO	\$403.20
04	12/04/2023	Approval of 2nd Additional SAWP and C.E.	SPATCO	\$81,781.54
				<u>\$181,962.16</u>

Approved Payments

18000157

180096

FORMER FLASH MARKET #10

Date Approved

Amount

4 /26/2023

\$5,782.91

1 /31/2024

\$73,671.78

\$79,454.69

APPLICATION FOR REIMBURSEMENT
from the
PETROLEUM STORAGE TANK TRUST FUND

(1) ADEQ Facility Identification Number: 18000157

(2) Responsible Party Information:

Company Name Flash Market Inc

Contact Person Jamie Patterson

Address P.O. Box 2378

City and State West Memphis, AR

Zip Code 72301

Phone _____

(3) Release Location

Facility Name Flash Market #10

Address 710 Ingram Blvd

City and State West Memphis, AR 72301

(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 5/25/2007


Release (LUST) Number 18-0096

PROOF OF PAYMENT AFFIDAVIT

I, Oriana Thompson 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 Env. Dept. Manag. of SPATCO Energy Solutions, I certify that, as of this date, SPATCO Energy Solutions LC has been paid in full by Flash Market, Inc. for the invoices contained in this reimbursement request:

Invoice Number	Invoice Date	Invoice Amount
93723392	4/29/2024	\$65,894.55
Total		\$65,894.55

Signed this 15th day of May, 2024

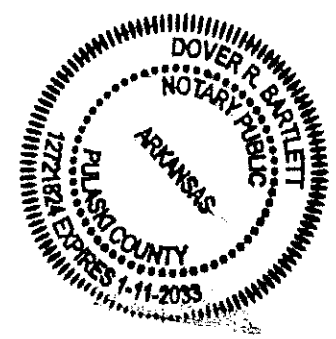

 Oriana Thompson / Enviro. Dept. Manager

ACKNOWLEDGEMENT

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


 Notary Public

My Commission Expires: 1/11/2033



Facility ID# 18000157

Date 05/07/24

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

Flash Market Inc.

Jamie Patterson

Type/Print name of Owner/Operator or Responsible Party

Jamie Patterson

Signature of Owner/Operator or Responsible Party

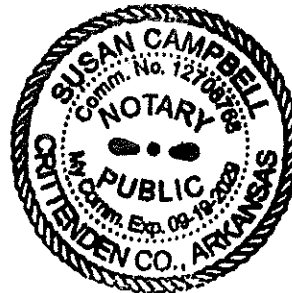
ACKNOWLEDGEMENT

Sworn to and subscribed before me this 8 day of May, 2024.

Susan Campbell

Notary Public

My Commission Expires: 09-19-2029



Interim Request No.	3	COST SUMMARY SHEET			
Consultant /Responsible Party: SPATCO Energy Solutions/Flash Market, Inc.					
Facility Identification #: 18000157		Facility Name: Flash Market #10			
Dates current costs incurred:	From	09/22/23	to	04/22/24	
				Request Date: 05/07/24	
COST SUMMARY					
1. DIRECT LABOR COST (attach labor recap)		Hours	Actual Cost		
Principal/Managerial		0.50	\$20.00		
Professional/Technical		230.50	\$8,088.03		
Support		16.00	\$339.00		
Totals		247.00	\$8,447.03		
Total Actual Labor Costs x 3				\$25,341.09	
2. FIXED RATE COSTS (List by category - attach recap)		Actual Cost			
Equipment Rental		\$627.00			
Per Diem (meals only, with documented overnight stay)		\$108.00			
Mileage		\$1,965.60			
Other		\$0.00			
Total Fixed Rate Costs				\$2,700.60	
3. OTHER DIRECT COSTS (List by category - attach recap)		Actual Cost			
Lodging		\$281.07			
Laboratory		\$8,890.00			
Subcontracts		\$18,800.31			
Supplies		\$0.00			
Other		\$2,739.41			
Total Other Direct Costs				\$30,710.79	
4. Reimbursement Preparation Cost for RA#(s) <u>2</u>		(\$500 or \$1000)		\$1,000.00	
5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)				\$59,752.48	
6. Markup on Total Other Direct Costs (maximum 20%)				\$6,142.07	
7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)				\$65,894.55	
A. Total Reimbursement Requested to Date Including Above:				\$152,854.17	
B. Less Amount Deductible (\$25,000, \$15,000, or \$7,500)				\$7,500.00	
C. Less Amount Previously Retained/Disallowed by RST:				\$4.93	
D. Less Amount Previously Received (Reimbursed by ADEQ):				\$79,454.69	
E. Amount of this Request (same as line 7 above unless it is the 1st Request):				\$65,894.55	

Consultant /Responsible Party: SPATCO Energy Solutions/Flash Market, Inc.

Facility Identification # 18000157 Facility Name: Flash Market #10

Dates costs incurred: From 09/22/23 to 04/22/24 Request date: 05/07/24

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
09/22/23	93723392	ORIANA THOMPSON	T1-WORKPLAN PREP	0.50	\$40.00	\$20.00
						\$0.00
						\$0.00
						\$0.00
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						\$0.00

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

TOTAL PRINCIPAL/MANAGERIAL: 0.50 \$20.00

Revised 01/2016

Consultant /Responsible Party: SPATCO Energy Solutions/Flash Market, Inc.

Facility Identification # 18000157 Facility Name: Flash Market #10

Dates costs incurred: From 09/22/23 to 04/22/24 Request date: 05/07/24

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
PROFESSIONAL/TECHNICAL:						
09/22/23	93723392	ANDREW TILLEY	WORKPLAN PREP-T1	0.50	\$40.00	\$20.00
09/28/23	93723392	ORIANA THOMPSON	WORKPLAN PREP-T1	1.00	\$40.00	\$40.00
09/28/23	93723392	ANDREW TILLEY	WORKPLAN PREP-T1	2.50	\$40.00	\$100.00
09/28/23	93723392	JASON HEMPHILL	WORKPLAN PREP-T1	1.00	\$36.06	\$36.06
10/02/23	93723392	ANDREW TILLEY	WORKPLAN PREP-T1	2.50	\$40.00	\$100.00
10/03/23	93723392	ANDREW TILLEY	WORKPLAN PREP-T1	2.00	\$40.00	\$80.00
10/05/23	93723392	ANDREW TILLEY	WORKPLAN PREP-T1	3.50	\$40.00	\$140.00
10/09/23	93723392	ANDREW TILLEY	WORKPLAN PREP-T1	7.00	\$40.00	\$280.00
10/12/23	93723392	ANDREW TILLEY	WORKPLAN PREP-T1	7.00	\$40.00	\$280.00
10/13/23	93723392	JASON HEMPHILL	WORKPLAN PREP-T1	3.00	\$36.06	\$108.18
10/17/23	93723392	ANDREW TILLEY	WORKPLAN PREP-T1	4.00	\$40.00	\$160.00
10/20/23	93723392	ANDREW TILLEY	WORKPLAN PREP-T1	3.00	\$40.00	\$120.00
10/25/23	93723392	ANDREW TILLEY	WORKPLAN PREP-T1	3.00	\$40.00	\$120.00
10/26/23	93723392	ANDREW TILLEY	WORKPLAN PREP-T1	2.50	\$40.00	\$100.00
10/26/23	93723392	JASON HEMPHILL	WORKPLAN PREP-T1	1.00	\$36.06	\$36.06
12/20/23	93723392	ANDREW TILLEY	SITE ASSESSMENT-T2	6.00	\$40.00	\$240.00
12/26/23	93723392	ANDREW TILLEY	SITE ASSESSMENT-T2	1.00	\$40.00	\$40.00
12/27/23	93723392	ANDREW TILLEY	SITE ASSESSMENT-T2	0.75	\$40.00	\$30.00
01/02/24	93723392	ANDREW TILLEY	SITE ASSESSMENT-T2	3.00	\$40.00	\$120.00
01/02/24	93723392	JASON HEMPHILL	SITE ASSESSMENT-T2	1.00	\$36.06	\$36.06
01/03/24	93723392	ANDREW TILLEY (tech rte)	SITE ASSESSMENT-T2	10.00	\$25.00	\$250.00
01/03/24	93723392	JASON HEMPHILL	SITE ASSESSMENT-T2	10.00	\$36.06	\$360.60
01/04/24	93723392	ANDREW TILLEY	SITE ASSESSMENT-T2	8.50	\$25.00	\$212.50
01/11/24	93723392	TUCKER HALL	SITE ASSESSMENT-T2	8.00	\$27.64	\$221.12
01/12/24	93723392	TUCKER HALL	SITE ASSESSMENT-T2	1.00	\$27.64	\$27.64
01/29/24	93723392	ORIANA THOMPSON	TRUST FUND MTG	1.00	\$40.00	\$40.00
01/31/24	93723392	ANDREW TILLEY	SITE ASSESSMENT-T2	2.50	\$40.00	\$100.00
02/01/24	93723392	ANDREW TILLEY	SITE ASSESSMENT-T2	11.50	\$40.00	\$460.00
02/01/24	93723392	TUCKER HALL	SITE ASSESSMENT-T2	11.50	\$27.64	\$317.86
02/02/24	93723392	ANDREW TILLEY	SAMPLES REVIEW - T3	2.00	\$40.00	\$80.00
02/15/24	93723392	ANDREW TILLEY	SAMPLES REVIEW - T3	0.75	\$40.00	\$30.00
						\$0.00

ADDITIONAL PROF/TECH COSTS (from the Extra Direct Labor Page):	108.50		\$3,801.95
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TOTAL PROFESSIONAL/TECHNICAL COSTS:	230.50		\$8,088.03
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Consultant /Responsible Party: SPATCO Energy Solutions/Flash Market, Inc.

Facility Identification # 18000157 Facility Name: Flash Market #10

Dates costs incurred: From **09/22/23** to **04/22/24** Request date: **05/07/24**

EXTRA DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
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Duplicate this page as needed to record each type of Direct Labor

02/23/24	93723392	ORIANA THOMPSON	SITE ASSESSMENT-T2	1.00	\$40.00	\$40.00
03/06/24	93723392	JASON HEMPHILL	SITE ASSESSMENT-T2	1.00	\$36.06	\$36.06
03/08/24	93723392	JASON HEMPHILL	SITE ASSESSMENT-T2	10.00	\$36.06	\$360.60
03/14/24	93723392	DIANA CURRY	SITE ASSESSMENT-T2	2.00	\$33.65	\$67.30
03/14/24	93723392	TUCKER HALL	SITE ASSESSMENT-T2	11.50	\$27.64	\$317.86
03/15/24	93723392	DIANA CURRY	SITE ASSESSMENT-T2	13.00	\$33.65	\$437.45
03/29/24	93723392	JASON HEMPHILL	SITE ASSESSMENT-T2	3.00	\$36.06	\$108.18
04/01/24	93723392	JASON HEMPHILL	REPORT PREP - T5	2.00	\$36.06	\$72.12
04/01/24	93723392	ANDREW TILLEY	REPORT PREP - T5	5.50	\$40.00	\$220.00
04/02/24	93723392	ANDREW TILLEY	REPORT PREP - T5	8.00	\$40.00	\$320.00
04/02/24	93723392	JASON HEMPHILL	REPORT PREP - T5	1.00	\$36.06	\$36.06
04/02/24	93723392	TUCKER HALL	REPORT PREP - T5	8.00	\$27.65	\$221.20
04/03/24	93723392	ANDREW TILLEY	REPORT PREP - T5	6.00	\$40.00	\$240.00
04/03/24	93723392	TUCKER HALL	REPORT PREP - T5	3.00	\$27.64	\$82.92
04/03/24	93723392	JASON HEMPHILL	REPORT PREP - T5	4.00	\$36.06	\$144.24
04/08/24	93723392	ANDREW TILLEY	REPORT PREP - T5	5.00	\$40.00	\$200.00
04/09/24	93723392	ANDREW TILLEY	REPORT PREP - T5	5.00	\$40.00	\$200.00
04/10/24	93723392	ANDREW TILLEY	REPORT PREP - T5	4.00	\$40.00	\$160.00
04/12/24	93723392	TUCKER HALL	REPORT PREP - T5	6.00	\$27.64	\$165.84
04/12/24	93723392	ANDREW TILLEY	REPORT PREP - T5	6.00	\$40.00	\$240.00
04/15/24	93723392	JASON HEMPHILL	REPORT PREP - T5	2.00	\$36.06	\$72.12
04/22/24	93723392	ANDREW TILLEY	REPORT PREP - T5	1.50	\$40.00	\$60.00
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Manually enter these totals on the corresponding "Direct Labor" page: **108.50** **\$3,801.95**

Interim Request No. 3 Page 6 of 16

Consultant /Responsible Party: SPATCO Energy Solutions/Flash Market, Inc.

Facility Identification # 18000157 Facility Name: Flash Market #10

Dates costs incurred: From 09/22/23 to 04/22/24 Request date: 05/07/24

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
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SUPPORT:

02/23/24	93723392	SHANE SMITH	DISPOSAL - T4	9.00	\$19.00	\$171.00
02/23/24	93723392	JOSH COOPER	DISPOSAL - T4	7.00	\$24.00	\$168.00
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ADDITIONAL SUPPORT COSTS (from the Extra Direct Labor Page):						
TOTAL SUPPORT COSTS:				16.00		\$339.00
TOTAL DIRECT LABOR COSTS:				247.00		\$8,447.03

Revised 01/2016

Consultant /Responsible Party: SPATCO Energy Solutions/Flash Market, Inc.

Facility Identification # 18000157 **Facility Name:** Flash Market #10

Dates costs incurred: From 09/22/23 to 04/22/24 **Request date:** 05/07/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	TRAVELER AND WORK PLAN TASK	# OF NIGHTS	RATE	AMOUNT
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MEAL PER DIEM:

					\$0.00
03/08/24	93723392	Jason Hemphill, Assessment-T2	✓ 1	\$54.00	\$54.00
03/14/24	93723392	Curry, Assessment - T2	✓ 1	\$54.00	\$54.00
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ADDITIONAL MEAL PER DIEM COSTS (from the Extra Fixed Rate Costs page):

TOTAL MEAL PER DIEM COSTS:				\$108.00
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Interim Request No.	3	Page	9	of	16
Consultant /Responsible Party:	SPATCO Energy Solutions/Flash Market, Inc.				
Facility Identification #	18000157	Facility Name:	Flash Market #10		
Dates costs incurred:	From	09/22/23	to	04/22/24	Request date: 05/07/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	ROUTE AND WORK PLAN TASK	# OF MILES	RATE	AMOUNT
MILEAGE:					
10/26/23	93723392	T1-ADEQ	√ 16.00	\$0.70	\$11.20
12/20/23	93723392	T2-Tilley, Off. Site. Off	√ 254.00	\$0.70	\$177.80
01/03/24	93723392	T2-Tilley, Off. Site. Off	√ 254.00	\$0.70	\$177.80
01/03/24	93723392	T2-Hemphill, office, site, fedex, office	√ 285.00	\$0.70	\$199.50
01/04/24	93723392	T2-Tilley, Off. Site. Off	√ 254.00	\$0.70	\$177.80
01/11/24	93723392	T2-Hall, Offi, site, office	√ 254.00	\$0.70	\$177.80
01/12/24	93723392	T2-Hall, office, AAI, office	√ 20.00	\$0.70	\$14.00
01/29/24	93723392	Thompson, DEQ, Trust Fund	√ 16.00	\$0.70	\$11.20
02/01/24	93723392	T2-Tilley, Off. Site. Off	√ 254.00	\$0.70	\$177.80
02/01/24	93723392	T2-Hall, off. Site. Off	√ 254.00	\$0.70	\$177.80
02/23/24	93723392	T4-Smith, Off. Penske. Office	√ 14.00	\$0.70	\$9.80
03/06/24	93723392	T2-Hemphill, off. NSS, Off	√ 12.00	\$0.70	\$8.40
03/08/24	93723392	T2-Hemplill, offise, site, lunch, hotel	√ 135.00	\$0.70	\$94.50
03/14/24	93723392	T2-Curry, office, hotel	√ 128.00	\$0.70	\$89.60
03/14/24	93723392	T2-Hall off, site, lunch, off	√ 258.00	\$0.70	\$180.60
03/15/24	93723392	T2-Curry, hotel, site, lunch, off	√ 130.00	\$0.70	\$91.00
04/12/24	93723392	T2-Hall, office, site, office	√ 254.00	\$0.70	\$177.80
04/22/24	93723392	T5-ADEQ	√ 16.00	\$0.70	\$11.20
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ADDITIONAL MILEAGE COSTS (from the Extra Fixed Rate Costs page):					\$0.00
TOTAL MILEAGE COSTS:					\$1,965.60

Consultant /Responsible Party: SPATCO Energy Solutions/Flash Market, Inc.

Facility Identification # 18000157 Facility Name: Flash Market #10

Dates costs incurred: From 09/22/23 to 04/22/24 Request date: 05/07/24

OTHER DIRECT COSTS DETAIL

DATE	INVOICE#	DESCRIPTION AND WORK PLAN TASK	AMOUNT
LABORATORY:			
01/10/24	801675132	PACE ANALYTICAL	\$651.00
02/20/24	801685834	PACE ANALYTICAL	\$3,125.00
02/20/24	K24Feb123	ARKANSAS ANALYTICAL	\$45.00
04/02/24	140024725	EUROFINS	\$5,069.00

ADDITIONAL LABORATORY COSTS (from the Extra Other Direct Costs page):	\$0.00
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TOTAL LABORATORY COSTS:	\$8,890.00
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Consultant /Responsible Party: **SPATCO Energy Solutions/Flash Market, Inc.**

Facility Identification # **18000157** Facility Name: **Flash Market #10**

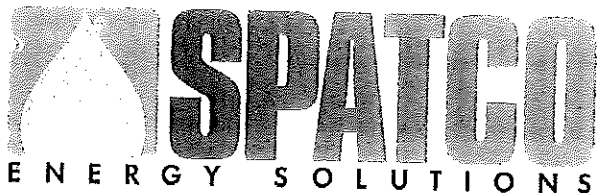
Dates costs incurred: From **09/22/23** to **04/22/24** Request date: **05/07/24**

OTHER DIRECT COSTS DETAIL

DATE	INVOICE#	DESCRIPTION AND WORK PLAN TASK	AMOUNT
SUBCONTRACTS:			
01/05/24	1012843	MCCRAY DRILLING, T2	\$5,581.70
01/10/24	729512	GPRS, T2	\$1,000.00
01/26/24	55	SAMUEL SMITH SURVEYING, LLC - T2	\$2,000.00
03/18/24	SCO21824DP	NEWGEN - T2	\$2,050.00
03/22/24	126519	FUTURES, T4	\$6,416.08
03/29/24	126541	FUTURES, T4	\$121.90
03/29/24	126539	FUTURES, T4	\$1,630.63

ADDITIONAL SUBCONTRACTS COSTS (from the Extra Other Direct Costs page): \$0.00

TOTAL SUBCONTRACTS COSTS: \$18,800.31



PLEASE MAKE REMITTANCE TO:
 PO BOX 5450
 CAROL STREAM, IL 60197-5450

PFMFC, INC
 PO Box 2389
 WEST MEMPHIS AR 72303

Ship-to address
 FLASH MARKET
 710 INGRAM BOULEVARD
 WEST MEMPHIS AR 72301

Invoice	
Number	93723392
Date	04/29/2024
Purchase Order Number	T.F. JAMIE
Sales Order Number	1550122
Customer Number	1054274
Salesman#	259, Little Rock House
Sales Office	0057, Little Rock

Currency USD

Conditions:
 Terms of payment Net 30
 Terms of delivery FOB SHIPPING POINT
 2ND ADDITIONAL SITE ASSESSMENT

Item	Item Detail		
10	Material:	INSTALLATION PRICE	2ND ADDITIONAL SITE ASSESSMENT
	Quantity	UOM	Price
	1	EA	65,894.55
			Extended price
			65,894.55
Items total:			65,894.55
Invoice amount:			65,894.55

PAST DUE INVOICE SUBJECT TO 1% MONTHLY SERVICE CHARGE AFTER 30 DAYS FROM INVOICE DATE

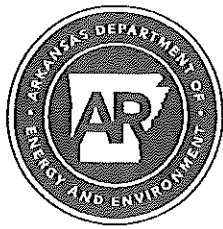
Flash Market, Inc.
P.O. Box 2389
West Memphis, AR 72301

LOCATION:
Flash Market #10
710 Ingram Blvd
West Memphis, AR

DATE	ITEM DESCRIPTION	UNITS	UNIT RATE	TOTAL
	Job set up. Site Assessment workplan prep			
9/22/2023	Env. Dept Mgr	0.50	\$120.00	\$60.00
9/22/2023	Professional Engineer, P.E.	0.50	\$120.00	\$60.00
9/28/2023	Env. Dept Mgr	1.00	\$120.00	\$120.00
9/28/2023	Professional Engineer, P.E.	2.50	\$120.00	\$300.00
9/28/2023	Professional Geologist, P.G.	1.00	\$108.18	\$108.18
10/2/2023	Professional Engineer, P.E.	2.50	\$120.00	\$300.00
10/3/2023	Professional Engineer, P.E.	2.00	\$120.00	\$240.00
10/5/2023	Professional Engineer, P.E.	3.50	\$120.00	\$420.00
10/9/2023	Professional Engineer, P.E.	7.00	\$120.00	\$840.00
10/12/2023	Professional Engineer, P.E.	7.00	\$120.00	\$840.00
10/13/2023	Professional Geologist, P.G.	3.00	\$108.18	\$324.54
10/17/2023	Professional Engineer, P.E.	4.00	\$120.00	\$480.00
10/20/2023	Professional Engineer, P.E.	3.00	\$120.00	\$360.00
10/25/2023	Professional Engineer, P.E.	3.00	\$120.00	\$360.00
10/26/2023	Professional Engineer, P.E.	2.50	\$120.00	\$300.00
10/26/2023	Senior Professional Geologist, P.G. miles	1.00 16.00	\$108.18 \$0.70	\$108.18 \$11.20
	Site Assessment Field Work. Trust Fund Mtg. Waste disposal.			
12/20/2023	Professional Engineer, P.E. miles - office, site, office	6.0 254.0	\$120.00 \$0.70	\$720.00 \$177.80
12/26/2023	Professional Engineer, P.E.	1.00	\$120.00	\$120.00
12/27/2023	Professional Engineer, P.E.	0.75	\$120.00	\$90.00
1/2/2024	Professional Engineer, P.E.	3.0	\$120.00	\$360.00
1/2/2024	Senior Professional Geologist, P.G.	1.0	\$108.18	\$108.18
1/3/2024	Professional Engineer, P.E. miles - office, site, office IP - day PID - day Hammer Drill - day	10.00 254.0 1.0 1.0 1.0	\$75.00 \$0.70 \$55.00 \$85.00 \$70.00	\$750.00 \$177.80 \$55.00 \$85.00 \$70.00
1/3/2024	Senior Professional Geologist, P.G. miles - office, site, fedex, office	10.0 285.0	\$108.18 \$0.70	\$1,081.80 \$199.50
1/4/2024	Professional Engineer, P.E. miles - office, site, office IP - day Development pump - day	8.50 254.0 1.0 1.0	\$75.00 \$0.70 \$55.00 \$72.00	\$637.50 \$177.80 \$55.00 \$72.00
1/11/2024	Engineer miles - office, site, office IP - day	8.0 254.0 1.0	\$82.92 \$0.70 \$55.00	\$663.36 \$177.80 \$55.00
1/12/2024	Engineer miles	1.0 20.0	\$82.92 \$0.70	\$82.92 \$14.00
1/29/2024	Env. Dept. Mgr miles	1.0 16.0	\$120.00 \$0.70	\$120.00 \$11.20
1/31/2024	Professional Engineer, P.E.	2.5	\$120.00	\$300.00
2/1/2024	Professional Engineer, P.E. miles - office, site, office Sample pro bladder pump - day Controller Compressor	11.5 254.0 1.0 1.0	\$120.00 \$0.70 \$50.00 \$75.00	\$1,380.00 \$177.80 \$50.00 \$75.00
2/1/2024	Engineer miles - office, site, office	11.5 254.0	\$82.92 \$0.70	\$953.58 \$177.80
2/2/2024	Professional Engineer, P.E.	2.0	\$120.00	\$240.00
2/15/2024	Professional Engineer, P.E.	0.75	\$120.00	\$90.00
2/23/2024	Env. Dept. Mgr	1.00	\$120.00	\$120.00

DATE	ITEM DESCRIPTION	UNITS	UNIT RATE	TOTAL
2/23/2024	Env. Tech	9.00	\$57.00	\$513.00
	miles - penske	14.00	\$0.70	\$9.80
2/23/2024	Tech	7.00	\$72.00	\$504.00
3/6/2024	Senior Professional Geologist, P.G.	1.0	\$108.18	\$108.18
	miles - office, Northside Sales, office	12.0	\$0.70	\$8.40
3/8/2024	Senior Professional Geologist, P.G.	10.0	\$108.18	\$1,081.80
	miles - office, site - split	135.0	\$0.70	\$94.50
	per diem	1.0	\$54.00	\$54.00
	MDPE. Dewater tankbasin. MDPE Event			
3/14/2024	Professional Geologist, P.G.	2.0	\$100.96	\$201.92
	Miles - office, site, hotel	128.0	\$0.70	\$89.60
	per diem	1.0	\$54.00	\$54.00
3/14/2024	Engineer	11.5	\$82.92	\$953.58
	Office, site, lunch, Office	258.0	\$0.70	\$180.60
3/15/2024	Professional Geologist, P.G.	13.0	\$100.96	\$1,312.48
	Miles, hotel, site, lunch, office	130.0	\$0.70	\$91.00
	Interface probe - day	1.0	\$55.00	\$55.00
3/29/2024	Senior Professional Geologist, P.G.	3.0	\$108.18	\$324.54
	Report Prep.			
4/1/2024	Senior Professional Geologist, P.G.	2.0	\$108.18	\$216.36
4/1/2024	Professional Engineer, P.E.	5.5	\$120.00	\$660.00
4/2/2024	Professional Engineer, P.E.	8.0	\$120.00	\$960.00
4/2/2024	Senior Professional Geologist, P.G.	1.0	\$108.18	\$108.18
4/2/2024	Engineer	8.0	\$82.92	\$663.36
4/3/2024	Professional Engineer, P.E.	6.0	\$120.00	\$720.00
4/3/2024	Engineer	3.0	\$82.92	\$248.76
4/3/2024	Senior Professional Geologist, P.G.	4.0	\$108.18	\$432.72
4/8/2024	Professional Engineer, P.E.	5.0	\$120.00	\$600.00
4/9/2024	Professional Engineer, P.E.	5.0	\$120.00	\$600.00
4/10/2024	Professional Engineer, P.E.	4.0	\$120.00	\$480.00
4/12/2024	Engineer (gauge wells)	6.0	\$82.92	\$497.52
	miles - office, site, office	254.0	\$0.70	\$177.80
	IP - day	1.0	\$55.00	\$55.00
4/12/2024	Professional Engineer, P.E.	6.0	\$120.00	\$720.00
4/15/2024	Senior Professional Geologist, P.G.	2.0	\$108.18	\$216.36
4/22/2024	Professional Engineer, P.E.	1.5	\$120.00	\$180.00
	Mileage	16.0	\$0.70	\$11.20
	Prepare RA#1 under \$50,000	1	\$1,000.00	\$1,000.00
DATE	THIRD PARTY EXPENSES	UNITS	UNIT RATE	TOTAL
3/9/2024	Comfort Suites	1	\$165.24	\$165.24
3/15/2024	Comfort Inn	1	\$172.04	\$172.04
1/10/2024	Pace Analytical	1	\$781.20	\$781.20
2/20/2024	Pace Analytical	1	\$3,750.00	\$3,750.00
2/20/2024	Arkansas Analytical	1	\$54.00	\$54.00
4/2/2024	Eurofins	1	\$6,082.80	\$6,082.80
1/5/2024	McCray	1	\$6,698.04	\$6,698.04
1/10/2024	GPRS	1	\$1,200.00	\$1,200.00
1/26/2024	Samuel Smith Surveying	1	\$2,400.00	\$2,400.00
3/18/2024	NewGen Resources	1	\$2,460.00	\$2,460.00
3/22/2024	Future Energy Services	1	\$7,699.30	\$7,699.30
3/29/2024	Future Energy Services	1	\$146.28	\$146.28
3/29/2024	Future Energy Services	1	\$1,956.76	\$1,956.76
12/20/2023	Walmart	1	\$13.79	\$13.79
12/26/2023	QED	1	\$303.23	\$303.23
12/26/2023	Vaporpin	1	\$707.30	\$707.30

DATE	ITEM DESCRIPTION	UNITS	UNIT RATE	TOTAL
12/28/2023	EnviroEquipment	1	\$500.56	\$500.56
1/2/2024	Walmart	1	\$29.18	\$29.18
1/3/2024	Our Store	1	\$5.03	\$5.03
2/1/2024	Ingram Gas	1	\$6.89	\$6.89
2/15/2024	UPS	1	\$27.12	\$27.12
2/20/2024	Eco Rental Solutions	1	\$673.57	\$673.57
3/1/2024	WM	1	\$289.08	\$289.08
2/25/2024	Penske	1	\$417.17	\$417.17
3/11/2024	NS Sales	1	\$288.00	\$288.00
3/13/2024	Home Depot	1	\$26.38	\$26.38
			INVOICE TOTAL	\$65,894.55



ARKANSAS

ENERGY & ENVIRONMENT

MEMORANDUM

To: *Bridgett Green 5/28/24*
Jacqueline Trotta, Trust Fund Administrator
Assessment & Remediation Program, Office of Land Resources

Through: Blake Whittle, P.G., Groundwater Branch Manager *BW 5/28/24*
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: May 28, 2024

Subject: Technical Review of Reimbursement Application #3
For Time Period: 9/22/23 – 4/22/24
Amount Requested: \$65,894.55
[Former] Flash Market #10
710 Ingram Blvd.
West Memphis, AR 72301
ID #18000157 LUST #18-0096 AFIN: 18-00729

The following is in response to your memo to me dated 5/20/24.

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?*

Site investigation. A 2nd *Additional Site Assessment Report* was submitted on 4/22/24. An Exposure Assessment is pending a final groundwater-gauging event scheduled for Summer, 2024.

- 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 remedy or clean-up goals have been selected at this time.

- 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.*

Interim free product removal (mobile dual-phase extraction) was implemented during performance of the 2nd *Additional Site Assessment* in February 2024. An estimated 16

vapor-equivalent gallons of hydrocarbons and 2,230 gallons of contaminated groundwater was removed during the MDPE event. No solid waste has been generated.

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) Development and implementation of a 2nd *Additional Site Assessment Work Plan*, approved on 12/4/23;
 - 2) Participation in the January 2024 Advisory Committee meeting; and
 - 3) Preparation of RA#3.
- b) *Identify any activity that may conflict with Rule 12 or that was not pre-approved by the technical staff.*

Neither unapproved activities, nor conflicts with Rule 12 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 consultant's summary reasonably reflects my understanding of the case during the application time period.

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 not provided a map. I have attached a map from the 2nd *Additional Site Assessment Report*, illustrating comprehensive analytical data of TPH-GRO in soil.

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

The subject release came to the department's attention on May 25, 2007 when free product was reported in leak detection monitoring wells. For reasons unknown, the case file was not referred to technical staff until February 2021. The responsible party no longer owns nor operates the subject UST facility.



May 15, 2024

RECEIVED

MAY 15 2024

SJ 4:21pm

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

MAY 16 2024

DEQ - RST

RE: Reimbursement Application # 3
Flash Market #10
710 Ingram Blvd.
West Memphis, AR 72301
Crittenden County
DEQ ID #: 18000157; AFIN: 18-00729; LUST #: 18-0096

Dear Ms. Trotta:

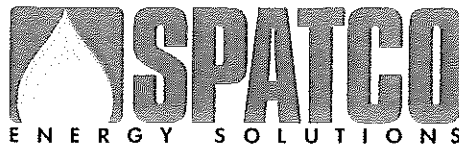
Please find attached the Reimbursement Application #3 for the above referenced facility in the amount of \$65,894.55. RA#3 is for Site Assessment activity.

Should you have any questions or require additional information, please do not hesitate to call Oriana Thompson at (501) 904-5727 or I at (501) 904-2510.

Sincerely,
On Behalf of SPATCO Energy Solutions, LLC,

A handwritten signature in black ink, appearing to read "Andrew Tilley".

Andrew Tilley, P.E.
Project Engineer



PROJECT SUMMARY

Flash Market #10
Mr. Jamie Patterson
710 Ingram Blvd., West Memphis, AR 72301

September 22, 2023 through April 22, 2024

Facility ID: 18000157; LUST: 18-0096; AFIN: 18-00729; Leak Date: May 25, 2007

The attached reimbursement application for \$65,894.55 represents costs associated with implementation of 2nd Additional Site Assessment (ASA) activities at the above-referenced LUST site.

In a letter dated September 18, 2023, the Arkansas Department of Energy and Environment, Division of Environmental Quality's (DEQ's) Office of Land Resources - Assessment and Remediation Program (OLR-ARP) requested that Mr. Jamie Patterson of Flash Market, Inc. prepare a 2nd Additional Site Assessment Work Plan and Cost Estimate at Leaking Underground Storage Tank (LUST) site number 18-0096 in accordance with 40 CFR §280.65. SPATCO submitted this plan on October 26, 2023 and was approved in a letter dated December 4, 2023.

2nd Additional Site Assessment field work was initiated on December 20, 2023. The 2nd Additional Site Assessment Report of assessment findings was submitted to the RST Division on April 22, 2024.

Activities onsite have included:

- Assessment work consisted of drilling three soil borings to a depth of 16' in each of the fifteen borings.
Construction and development of two groundwater monitoring wells;
Seven sub-slab vapor pins installed inside of the building;
Soil, groundwater, and soil vapor sampling and analyses;
One eight-hour MDPE event;
Management of assessment-derived waste; and
Completion and submission of 2nd Additional Site Assessment Report documenting findings.

This is the third reimbursement package for LUST# 18-0096 and consists of one invoice for \$65,894.55.

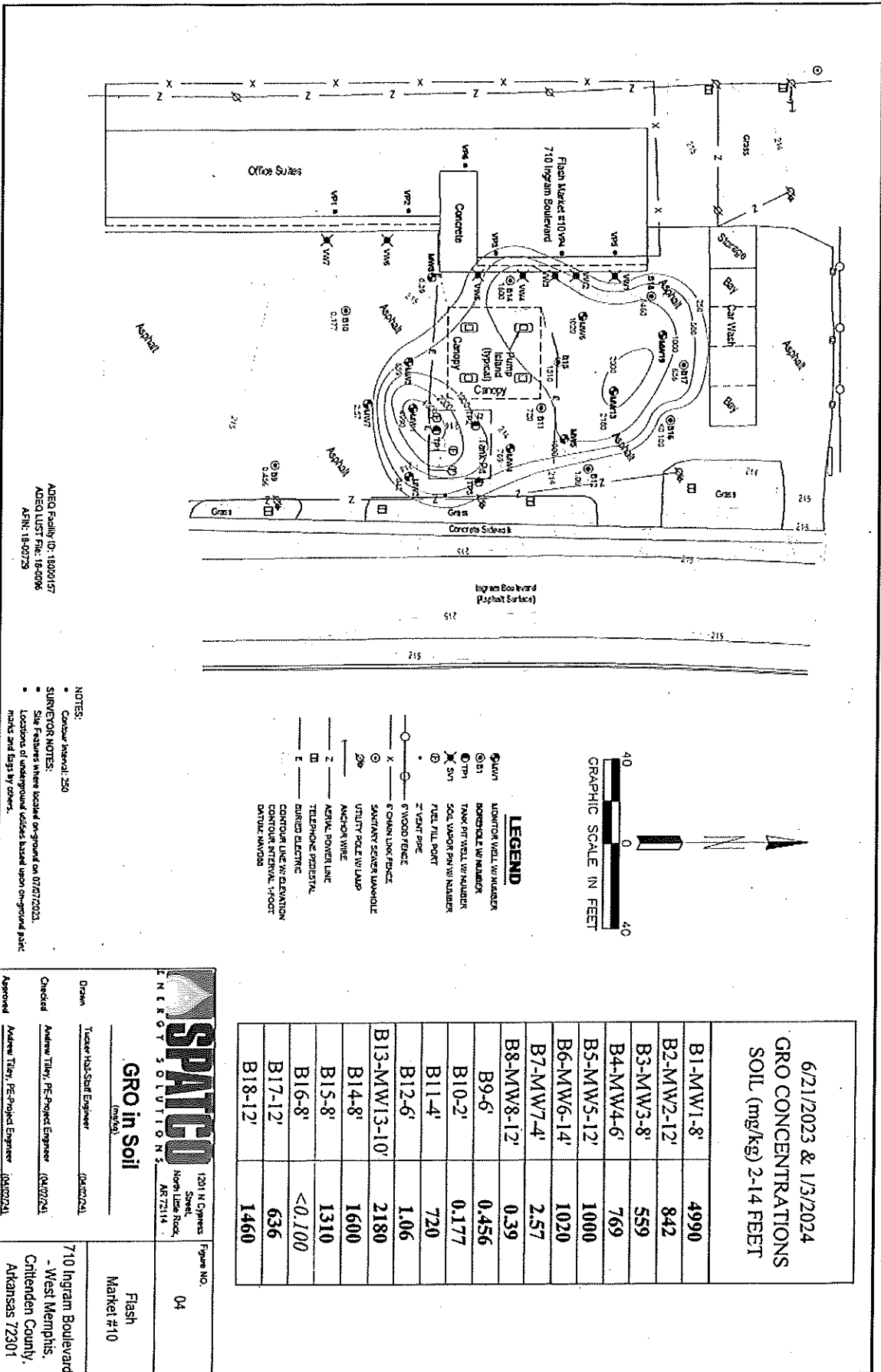
The following is the RA Request #3 information:

Table with 2 columns: RA Request #2 Information and 2nd Additional Site Assessment. Rows include Total Approved Work Plan Costs (\$81,781.54), Current Reimbursement Request (\$65,894.55), and Remaining Work Plan Balance (\$15,886.99).

The SPATCO Energy Solutions, LLC appreciates the Division of Environmental Quality's continued cooperation on this project. If you have any questions, please contact me at 501-376-6333.

Regards,

Oriana Thompson, M.S.
Environmental Division Manager





ARKANSAS

ENERGY & ENVIRONMENT

MEMORANDUM OF REVIEW Reimbursement Request Petroleum Storage Tank Trust Fund

From: Petroleum Storage Tank Trust Fund Staff

Date: June 26, 2024

Subject: **Marion BP (Former)**
210 Military Road
Marion, AR 72364
ID #18000162 LUST #18-0144 AFIN 18-00732

A request for reimbursement (#5) for costs incurred during remediation of an Underground Storage Tank (UST) site was received from the Responsible Party (RP) on March 15, 2024. The RP of this site reported a product release (#18-0144) on July 6, 2018, after receiving notification of elevated contaminant levels on soil samples as part of a voluntary tank removal. The name and the address of the RP:

JFB Oil Properties 1, LLC.
Attn: Elizabeth Bell
805 W. Barton Avenue
West Memphis, AR 72301

The period covered by this application is January 4, 2023 through January 19, 2024. Remediation activities for which reimbursement is requested include: implementation of a Second Additional Work Plan, preparation and implementation of a Third Additional Site Assessment Work Plan, and preparation of Reimbursement Application #5.

No solid or liquid waste, other than the IDW, has been removed under an approved work plan

This application includes one (1) invoice from SPATCO Energy Solutions (SPATCO) totaling **\$31,426.21**. Included in SPATCO's invoice are charges from: McCray Drilling (\$4,810.25), Eurofins (\$3,918.50), Samuel Smith Surveying (\$1,200.00), and GPRS (\$1,000.00).

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

RECOMMENDATION:

The claimed cost of **\$31,426.21** was checked against documentation provided. **An adjustment of \$2.40 to remove costs of a hotel safe and warranty 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	\$31,426.21
Less: Deductible	- 00.00
Less: Adjustments	- <u>2.40</u>
Total Net Claim	<u>\$31,423.81</u>

It is recommended that the claim made by the RP be considered in the amount of **\$31,423.81**.

18000162-05 LUST #18-0144 MM, JT

Approved Work Plans

18000162 18-0144 MARION BP (FORMER)

	<u>Date</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	04/04/2019	Revised Site Assessment Work Plan	SoCo	\$69,138.40
02	12/03/2019	CO #1 to Site Assessment Work Plan	SoCo	\$280.00
03	12/09/2019	Revised ASAWP and Revised Cost Estimate	SoCo	\$126,228.56
04	02/13/2020	Approval of CO #1 Additional SAWP	SoCo	\$24,886.01
05	12/01/2020	Approval of C.O.#2-Additonal SAWP	SoCo	\$4,278.34
06	11/03/2021	Approval of Second ASAWP & C.E.	SPATCO	\$108,601.18
07	12/29/2021	Approval of CO #1-2nd Additional SAWP	SPATCO	\$17,608.28
08	07/01/2022	Approval of CO #2-2nd ASAWP	SPATCO	\$12,995.76
09	10/27/2023	Approval of 3rd ASAWP and C.E.	SPATCO	\$29,878.98
				<u>\$393,895.51</u>

Approved Payments

18000162

180144

MARION BP (FORMER)

Date Approved

Amount

2 /26/2020

\$51,714.99

3 /31/2021

\$154,305.19

8 /31/2022

\$80,785.29

2 /22/2023

\$31,663.48

\$318,468.95

APPLICATION FOR REIMBURSEMENT
from the
PETROLEUM STORAGE TANK TRUST FUND

(1) ADEQ Facility Identification Number: 18000162

(2) Responsible Party Information:

Company Name JF Baker Oil ~~Company~~ Properties, LLC (ST)

Contact Person Elizabeth Bell

Address 805 W. Barton Ave

City and State West Memphis, Arkansas

Zip Code 72301

Phone 5018235501

(3) Release Location

Facility Name Marion BP (Former)

Address 210 Military Road

City and State Marion, Arkansas 72364

(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 7/6/2018 Release (LUST) Number 18-1444

Facility ID# 18000162

Date 03/04/24

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

Diane Britton, Trustee
Type/Print name of Owner/Operator or Responsible Party

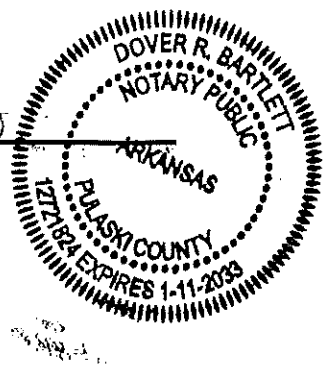
Diane Britton, Trustee
Signature of Owner/Operator or Responsible Party

ACKNOWLEDGEMENT

Sworn to and subscribed before me this 14th day of March, 2024.

Dover R. Bartlett
Notary Public

My Commission Expires: 1/11/2033



PROOF OF PAYMENT AFFIDAVIT

I, Oriana Thompson 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 Env. Dept. Mgr. of Spatco Energy Solutions, LLC, I certify that, as of this date, Spatco Energy Solutions, LLC has been paid in full by JF Baker Oil Company for the invoices contained in this reimbursement request:

Invoice Number	Invoice Date	Invoice Amount
93698060	2/23/2024	\$31,426.21
Total		\$31,426.21

Signed this 11th day of March, 2024

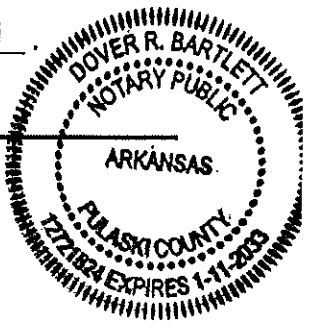
[Signature]
Env. Dept Mgr.

ACKNOWLEDGEMENT

Sworn to and subscribed before me this 11th day of March, 2024.

[Signature]
 Notary Public

My Commission Expires: 1/11/2033



Interim Request No.	5	COST SUMMARY SHEET			
Consultant /Responsible Party: Spatco Energy Solutions/ JF Baker Oil Company					
Facility Identification #: 18000162		Facility Name: Marion BP (Former)			
Dates current costs incurred:	From	01/04/23	to	01/19/24	
				Request Date:	03/04/24
COST SUMMARY					
1. DIRECT LABOR COST (attach labor recap)		Hours	Actual Cost		
Principal/Managerial		2.00	\$76.92 ✓		
Professional/Technical		99.00	\$3,551.76 ✓		
Support		30.50	\$1,093.14 ✓		
Totals		131.50	\$4,721.82		
Total Actual Labor Costs x 3			\$14,165.46		
2. FIXED RATE COSTS (List by category - attach recap)		Actual Cost			
Equipment Rental		\$170.00 ✓			
Per Diem (meals only, with documented overnight stay)		\$108.00 ✓			
Mileage		\$968.80 ✓			
Other		\$0.00 ✓			
Total Fixed Rate Costs		\$1,246.80			
3. OTHER DIRECT COSTS (List by category - attach recap)		Actual Cost			
Lodging		\$287.29 ✓			
Laboratory		\$4,183.50 ✓			
Subcontracts		\$7,010.25 ✓			
Supplies		\$0.00 ✓			
Other		\$1,447.05 ✓			
Total Other Direct Costs		\$12,928.09			
4. Reimbursement Preparation Cost for RA#(s)		(\$500 or \$1000)		\$500.00 ✓	
5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)		\$28,840.35 ✓			
6. Markup on Total Other Direct Costs (maximum 20%)		\$2,585.86 ✓			
7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)		\$31,426.21			
A. Total Reimbursement Requested to Date Including Above:		\$357,677.18 ✓			
B. Less Amount Deductible (\$25,000, \$15,000, or \$7,500)		\$7,500.00 ✓			
C. Less Amount Previously Retained/Disallowed by RST:		\$282.02 ✓			
D. Less Amount Previously Received (Reimbursed by ADEQ):		\$318,468.95 ✓			
E. Amount of this Request (same as line 7 above unless it is the 1st Request):		\$31,426.21 ✓			

Consultant /Responsible Party: Spatco Energy Solutions/ JF Baker Oil Company

Facility Identification # 18000162 Facility Name: Marion BP (Former)

Dates costs incurred: From 01/04/23 to 01/19/24 Request date: 03/04/24

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
PRINCIPAL/MANAGERIAL:						
07/21/23	93698060	O. Thompson	3RD ADD ASSESS WP PR	2.00	\$38.46	\$76.92
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
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ADDITIONAL PRINC/MGR COSTS (from the Extra Direct Labor Page):						
TOTAL PRINCIPAL/MANAGERIAL:				2.00		\$76.92

Interim Request No.	5	Page	5	of	16
Consultant /Responsible Party:	Spatco Energy Solutions/ JF Baker Oil Company				
Facility Identification #	18000162	Facility Name:	Marion BP (Former)		
Dates costs incurred:	From	01/04/23	to	01/19/24	Request date: 03/04/24

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
PROFESSIONAL/TECHNICAL:						
01/04/23	93698060	J. Hemphill	Q4 SAMPLING	1.00	\$36.06	\$36.06
01/05/23	93698060	J. Hemphill	Q4 SAMPLING	8.00	\$36.06	\$288.48
01/06/23	93698060	J. Hemphill	Q4 SAMPLING	10.00	\$36.06	\$360.60
01/09/23	93698060	J. Hemphill	Q4 REPORT	1.50	\$36.06	\$54.09
01/24/23	93698060	J. Hemphill	Q4 REPORT	4.00	\$36.06	\$144.24
01/31/23	93698060	J. Hemphill	Q4 REPORT	8.00	\$36.06	\$288.48
02/08/23	93698060	J. Hemphill	Q4 REPORT	6.00	\$36.06	\$216.36
02/08/23	93698060	D. Curry	Q4 REPORT	1.50	\$30.00	\$45.00
07/21/23	93698060	J. Hemphill	3RD ASSESS. WP PREP	2.00	\$36.06	\$72.12
07/24/23	93698060	J. Hemphill	3RD ASSESS. WP PREP	2.00	\$36.06	\$72.12
07/26/23	93698060	J. Hemphill	3RD ASSESS. WP PREP	2.00	\$36.06	\$72.12
08/10/23	93698060	J. Hemphill	3RD ASSESS. WP PREP	2.00	\$36.06	\$72.12
08/11/23	93698060	J. Hemphill	3RD ASSESS. WP PREP	2.00	\$36.06	\$72.12
08/14/23	93698060	J. Hemphill	3RD ASSESS. WP PREP	1.00	\$36.06	\$36.06
08/21/23	93698060	J. Hemphill	3RD ASSESS. WP PREP	2.00	\$36.06	\$72.12
08/22/23	93698060	J. Hemphill	3RD ASSESS. WP PREP	2.00	\$36.06	\$72.12
08/24/23	93698060	J. Hemphill	3RD ASSESS. WP PREP	1.00	\$36.06	\$36.06
08/25/23	93698060	J. Hemphill	3RD ASSESS. WP PREP	1.00	\$36.06	\$36.06
09/13/23	93698060	J. Hemphill	3RD ASSESS. WP PREP	3.00	\$36.06	\$108.18
09/15/23	93698060	J. Hemphill	3RD ASSESS. WP PREP	1.00	\$36.06	\$36.06
09/19/23	93698060	J. Hemphill	3RD ASSESS. WP PREP	2.00	\$36.06	\$72.12
09/20/23	93698060	J. Hemphill	3RD ASSESS. WP PREP	4.00	\$36.06	\$144.24
09/21/23	93698060	D. Curry	3RD ASSESS. WP PREP	1.50	\$30.00	\$45.00
09/22/24	93698060	J. Hemphill	3RD ASSESS. WP PREP	1.00	\$36.06	\$36.06
10/02/23	93698060	J. Hemphill	3RD ASSES. IMPLEME	6.00	\$36.06	\$216.36
10/27/23	93698060	J. Hemphill	3RD ASSES. IMPLEME	2.00	\$36.06	\$72.12
10/31/23	93698060	J. Hemphill	3RD ASSES. IMPLEME	0.50	\$36.06	\$18.03
11/06/23	93698060	J. Hemphill	3RD ASSES. IMPLEME	4.00	\$36.06	\$144.24
11/20/23	93698060	J. Hemphill	3RD ASSES. IMPLEME	8.00	\$36.06	\$288.48
11/21/23	93698060	J. Hemphill	3RD ASSES. IMPLEME	8.00	\$36.06	\$288.48
12/08/23	93698060	J. Hemphill	3RD ASSES. IMPLEME	1.00	\$36.06	\$36.06
						\$0.00

ADDITIONAL PROF/TECH COSTS (from the Extra Direct Labor Page):

TOTAL PROFESSIONAL/TECHNICAL COSTS:

99.00

\$3,551.76

Consultant /Responsible Party: Spatco Energy Solutions/ JF Baker Oil Company

Facility Identification # 18000162 Facility Name: Marion BP (Former)

Dates costs incurred: From 01/04/23 to 01/19/24 Request date: 03/04/24

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
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SUPPORT:						
12/09/23	93698060	J. HEMPHILL	3RD ASSES. IMPLEMEN	8.00 /	\$36.06	\$288.48
12/11/23	93698060	J. HEMPHILL	3RD ASSES. IMPLEMEN	2.00 /	\$36.06	\$72.12
12/30/23	93698060	J. HEMPHILL	REPORTING	3.00 /	\$36.06	\$108.18
01/04/24	93698060	J. HEMPHILL	REPORTING	3.00 /	\$36.06	\$108.18
01/05/24	93698060	J. HEMPHILL	REPORTING	5.00 /	\$36.06	\$180.30
01/09/24	93698060	J. HEMPHILL	REPORTING	2.00 /	\$36.06	\$72.12
01/12/24	93698060	D. CURRY	REPORTING	1.50 /	\$30.00	\$45.00
01/18/24	93698060	J. HEMPHILL	REPORTING	2.00 /	\$36.06	\$72.12
01/19/24	93698060	O. THOMPSON	REPORTING	1.00 /	\$38.46	\$38.46
01/19/24	93698060	J. HEMPHILL	REPORTING	3.00 /	\$36.06	\$108.18
						\$0.00
						\$0.00
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						\$0.00

ADDITIONAL SUPPORT COSTS (from the Extra Direct Labor Page):		
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TOTAL SUPPORT COSTS:	30.50	\$1,093.14
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TOTAL DIRECT LABOR COSTS:	131.50	\$4,721.82
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Consultant /Responsible Party: Spatco Energy Solutions/ JF Baker Oil Company

Facility Identification # 18000162 Facility Name: Marion BP (Former)

Dates costs incurred: From 01/04/23 to 01/19/24 Request date: 03/04/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	VENDOR AND WORK PLAN TASK	UNITS	RATE	AMOUNT
EQUIPMENT RENTAL					
11/20/23	93698060	PID	1	\$85.00	\$85.00
11/21/23	93698060	PID	1	\$85.00	\$85.00
					\$0.00
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					\$0.00

ADDITIONAL EQUIPMENT RENTAL (from the Extra Fixed Rate Costs page): TOTAL EQUIPMENT RENTAL: \$170.00

Interim Request No.	5	Page	8	of	16
Consultant /Responsible Party:		Spatco Energy Solutions/ JF Baker Oil Company			
Facility Identification #		18000162 Facility Name: Marion BP (Former)			
Dates costs incurred:	From	01/04/23	to	01/19/24	Request date: 03/04/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	TRAVELER AND WORK PLAN TASK	# OF NIGHTS	RATE	AMOUNT
MEAL PER DIEM:					
01/06/23	93698060	J. Hemphill	1	\$54.00	\$54.00
12/09/23	93698060	J. Hemphill	1	\$54.00	\$54.00
					\$0.00
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					\$0.00

ADDITIONAL MEAL PER DIEM COSTS (from the Extra Fixed Rate Costs page):	
TOTAL MEAL PER DIEM COSTS:	\$108.00

Revised 01/2016

Interim Request No.	5	Page	9	of	16
Consultant /Responsible Party:		Spatco Energy Solutions/ JF Baker Oil Company			
Facility Identification # 18000162		Facility Name: Marion BP (Former)			
Dates costs incurred:		From	01/04/23	to	01/19/24
					Request date: 03/04/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	ROUTE AND WORK PLAN TASK	# OF MILES	RATE	AMOUNT
MILEAGE:					
01/05/23	93698060	MILEAGE-off, site, meals, hotel	133.00 ✓	\$0.70	\$93.10
01/06/23	93698060	MILEAGE - hotel, site, meals, off	130.00 ✓	\$0.70	\$91.00
01/09/23	93698060	Office, NSS, Party City,	33.00 ✓	\$0.70	\$23.10
02/08/23	93698060	Office, DEQ, office	16.00 ✓	\$0.70	\$11.20
09/22/23	93698060	Office, DEQ, office	16.00 ✓	\$0.70	\$11.20
10/02/23	93698060	Office, site, office	255.00 ✓	\$0.70	\$178.50
11/20/23	93698060	Office, site, office	255.00 ✓	\$0.70	\$178.50
11/21/23	93698060	Office, site, office	255.00 ✓	\$0.70	\$178.50
12/08/23	93698060	NSS	12.00 ✓	\$0.70	\$8.40
12/09/23	93698060	hotel, site, NSS, off	133.00 ✓	\$0.70	\$93.10
12/11/23	93698060	MILEAGE	130.00 ✓	\$0.70	\$91.00
01/19/24	93698060	MILEAGE ADEQ	16.00	\$0.70	\$11.20
					\$0.00
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					\$0.00
ADDITIONAL MILEAGE COSTS (from the Extra Fixed Rate Costs page):					\$0.00
TOTAL MILEAGE COSTS:					\$968.80

Interim Request No. 5 Page 11 of 16

Consultant /Responsible Party: Spatco Energy Solutions/ JF Baker Oil Company

Facility Identification # 18000162 Facility Name: Marion BP (Former)

Dates costs incurred: From 01/04/23 to 01/19/24 Request date: 03/04/24

OTHER DIRECT COSTS DETAIL

DATE	INVOICE#	TRAVELER'S NAME, # OF NIGHTS AND WORK PLAN TASK	AMOUNT
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LODGING:

01/05/23	849812938	J. Hemphill, 1 night, Task 2	\$139.37
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12/13/23	903197139	J. Hemphill, 1 night, Task 2	\$147.92
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ADDITIONAL LODGING COSTS (from the Extra Other Direct Costs page):	\$0.00
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TOTAL LODGING COSTS:	\$287.29
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Interim Request No. 5 Page 15 of 16

Consultant /Responsible Party: Spatco Energy Solutions/ JF Baker Oil Company

Facility Identification # 18000162 Facility Name: Marion BP (Former)

Dates costs incurred: From 01/04/23 to 01/19/24 Request date: 03/04/24

OTHER DIRECT COSTS DETAIL

DATE	INVOICE#	DESCRIPTION AND WORK PLAN TASK	AMOUNT
OTHER/MISC. DIRECT COSTS:			
01/05/23	8967600	Barton's of West Memphis - fittings, Task 2	\$24.67 ✓
01/07/23	09421Q	Party City - helium, Task 2	\$473.75 ✓
01/09/23	0FFLN	Party City - deposit refund, Task 2	-\$200.00 ✓
01/10/23	125499	Northside Sales Co.	\$101.30
01/11/23	125513	Northside Sales Co.	\$240.00 ✓
10/27/23	147099	ECT Manufacturing	\$298.87 ✓
10/27/23	22881	Vapor Pin	\$189.14 ✓
11/14/23	535115	Marketplace	\$22.99 ✓
12/09/23	7SLJSDCYXR6	Walmart	\$56.33 ✓
12/11/23	129499	Northside Sales Co.	\$240.00 ✓

ADDITIONAL OTHER/MISC. COSTS (from the Extra Other Direct Costs page): \$0.00

TOTAL OTHER/MISC. COSTS: \$1,447.05

TOTAL OTHER DIRECT COSTS: \$12,928.09

Revised 01/2016



PLEASE MAKE REMITTANCE TO:
 PO BOX 5450
 CAROL STREAM, IL 60197-5450

JAMES F. BAKER OIL COMPANY
 203 RIVERTRACE
 MARION AR 72364

Ship-to address
 MARION BP
 210 MILITARY RD.
 MARION AR 72364

Invoice	
Number	93698060
Date	02/23/2024
Purchase Order Number	T.F.
Sales Order Number	1444636
Customer Number	1053122
Salesman#	259, Little Rock House
Sales Office	0057, Little Rock

Currency USD

Conditions:

Terms of payment Net 30
 Terms of delivery FOB SHIPPING POINT

4TH QUARTER SAMPLING EVENT
 3RD ADDITIONAL SITE ASSESSMENT WORKPLAN AND IMPLEMENTATION - T.F.

Item	Item Detail			
10	Material:	INSTALLATION PRICE		Installation - Contract Price
	Quantity	UOM	Price	Extended price
	1	EA	31,426.21	31,426.21

Items total: 31,426.21

Invoice amount: 31,426.21

PAST DUE INVOICE SUBJECT TO 1% MONTHLY SERVICE CHARGE AFTER 30 DAYS FROM INVOICE DATE

Baker Oil Co

LOCATION
 Marion BP
 210 E. Military rd
 Marion, AR

DATE	DESCRIPTION	UNITS	UNIT PRICE	TOTAL PRICE
	Q4 sampling			\$ -
01/04/23	Professional Geologist	1.00	\$ 108.18	\$ 108.18
01/05/23	Professional Geologist	8.00	\$ 108.18	\$ 865.44
	mileage	133.00	\$ 0.70	\$ 93.10
	per diem	1.00	\$ 54.00	\$ 54.00
01/06/23	Professional Geologist	10.00	\$ 108.18	\$ 1,081.80
	mileage	130.00	\$ 0.70	\$ 91.00
	Q4 Report			
01/09/23	Professional Geologist	1.50	\$ 108.18	\$ 162.27
	mileage	33.00	\$ 0.70	\$ 23.10
01/24/23	Professional Geologist	4.00	\$ 108.18	\$ 432.72
01/31/23	Professional Geologist	8.00	\$ 108.18	\$ 865.44
02/08/23	Geologist	1.50	\$ 90.00	\$ 135.00
02/08/23	Professional Geologist	6.00	\$ 108.18	\$ 649.08
02/08/23	mileage	16.00	\$ 0.70	\$ 11.20
				\$ -
	3rd Additional Site Assessment WP.			
07/21/23	Professional Geologist	2.0	\$ 108.18	\$ 216.36
07/21/23	Env. Dept. Mgr.	2.0	\$ 115.38	\$ 230.76
07/24/23	Professional Geologist	2.0	\$ 108.18	\$ 216.36
07/26/23	Professional Geologist	2.0	\$ 108.18	\$ 216.36
07/31/23	Professional Geologist			
08/02/23	Professional Geologist			
08/10/23	Professional Geologist	2.0	\$ 108.18	\$ 216.36
08/11/23	Professional Geologist	2.0	\$ 108.18	\$ 216.36
08/14/23	Professional Geologist	1.0	\$ 108.18	\$ 108.18
08/21/23	Professional Geologist	2.0	\$ 108.18	\$ 216.36
08/22/23	Professional Geologist	2.0	\$ 108.18	\$ 216.36
08/24/23	Professional Geologist	1.0	\$ 108.18	\$ 108.18
08/25/23	Professional Geologist	1.0	\$ 108.18	\$ 108.18
09/13/23	Professional Geologist	3.0	\$ 108.18	\$ 324.54
09/15/23	Professional Geologist	1.0	\$ 108.18	\$ 108.18
09/19/23	Professional Geologist	2.00	\$ 108.18	\$ 216.36
09/20/23	Professional Geologist	4.00	\$ 108.18	\$ 432.72
09/21/23	Geologist	1.50	\$ 90.00	\$ 135.00
09/22/23	Professional Geologist	1.00	\$ 108.18	\$ 108.18
09/22/23	mileage	16.00	\$ 0.70	\$ 11.20
	Access agreement.			
10/02/23	Professional Geologist	6.00	\$ 108.18	\$ 649.08
10/02/23	mileage	255.00	\$ 0.70	\$ 178.50

Baker Oil Co

LOCATION
 Marion BP
 210 E. Military rd
 Marion, AR

DATE	DESCRIPTION	UNITS	UNIT PRICE	TOTAL PRICE
Project Management. GPR. Install vapor wells				
10/27/23	Professional Geologist	2.00	\$ 108.18	\$ 216.36
10/31/23	Professional Geologist	0.50	\$ 108.18	\$ 54.09
11/06/23	Professional Geologist	4.00	\$ 108.18	\$ 432.72
11/20/23	Professional Geologist	8.00	\$ 108.18	\$ 865.44
	mileage	255.00	\$ 0.70	\$ 178.50
	PID	1.00	\$ 85.00	\$ 85.00
11/21/23	Professional Geologist	8.00	\$ 108.18	\$ 865.44
	PID	1.00	\$ 85.00	\$ 85.00
	mileage	255.00	\$ 0.70	\$ 178.50
Sampling				
12/08/23	Professional Geologist	1.00	\$ 108.18	\$ 108.18
	mileage - NSS	12.00	\$ 0.70	\$ 8.40
12/09/23	Professional Geologist	8.00	\$ 108.18	\$ 865.44
	mileage	133.00	\$ 0.70	\$ 93.10
	per diem	1.00	\$ 54.00	\$ 54.00
12/11/23	Professional Geologist	2.00	\$ 108.18	\$ 216.36
	mileage	130.00	\$ 0.70	\$ 91.00
Reporting				
12/30/23	Professional Geologist	3.00	\$ 108.18	\$ 324.54
01/04/24	Professional Geologist	3.00	\$ 108.18	\$ 324.54
01/05/24	Professional Geologist	5.00	\$ 108.18	\$ 540.90
01/09/24	Professional Geologist	2.00	\$ 108.18	\$ 216.36
01/12/23	Geologist	1.50	\$ 90.00	\$ 135.00
01/18/24	Professional Geologist	2.00	\$ 108.18	\$ 216.36
01/19/24	Env. Dept. Mgr.	1.00	\$ 115.38	\$ 115.38
01/19/24	Professional Geologist	3.00	\$ 108.18	\$ 324.54
	mileage	16.00	\$ 0.70	\$ 11.20
	Trust Fund package preparation	1.0	\$ 500.00	\$ 500.00
THIRD PARTY TICKETS				
		Unit	Unit Price	Total Price
01/09/23	Comfort Inn	1.0	\$ 167.24	\$ 167.24
12/13/23	Comfort Suites	1.0	\$ 177.50	\$ 177.50
01/21/23	Arkansas Analytical	1.0	\$ 318.00	\$ 318.00
01/30/24	Eurofins	1.0	\$ 4,702.20	\$ 4,702.20
11/27/23	GPRS	1.0	\$ 1,200.00	\$ 1,200.00
11/27/23	McCray	1.0	\$ 5,772.30	\$ 5,772.30
12/27/23	Samuel Smith Survey	1.0	\$ 1,440.00	\$ 1,440.00

Baker Oil Co

LOCATION
Marion BP
210 E. Military rd
Marion, AR

DATE	DESCRIPTION	UNITS	UNIT PRICE	TOTAL PRICE
01/05/23	Barton's of West Memphis	1.0	\$ 29.60	\$ 29.60
01/10/23	Northside Sales	1.0	\$ 121.56	\$ 121.56
01/11/23	Northside Sales	1.0	\$ 288.00	\$ 288.00
01/07/23	Party City	1.0	\$ 568.50	\$ 568.50
01/09/23	Party City - deposit refund	1.0	\$ (240.00)	\$ (240.00)
10/27/23	ECT Manufacturing	1.0	\$ 358.64	\$ 358.64
10/27/23	Vaporpin	1.0	\$ 226.97	\$ 226.97
11/14/23	Marketplace	1.0	\$ 27.59	\$ 27.59
12/09/23	Walmart	1.0	\$ 67.84	\$ 67.84
12/11/23	Northside sales	1.0	\$ 288.00	\$ 288.00
TOTAL CHARGES				\$ 31,426.21

\$ 31,426.21



ARKANSAS

ENERGY & ENVIRONMENT

MEMORANDUM

Matthew McGhee 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, Professional Geologist *M.R.S.*
RST, A & R Program, OLR

Date: April 10, 2024

Subject: Technical Review of Reimbursement Application #5
For Time Period: January 4, 2023 – January 19, 2024
Amount Requested: \$31,426.21
Marion BP (Former) ["JFB Oil Properties 1, LLC"]
210 Military Road
Marion, AR 72364
ID #18000162 LUST #18-0144 AFIN: 18-00732

The following is in response to your memo to me dated 3/18/24.

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?*

Site Investigation – A *Third Additional Site Assessment Report* was submitted by SPATCO Energy Solutions on 1/19/24. A request for an interim free product removal work plan was issued by OLR RST on 3/18/24. A work plan and cost estimate for extended vapor sampling and interim free product removal on an impacted off-site commercial property (Marion's Market Place) will be submitted by "JFB Oil Properties 1, LLC" on or before 5/3/24.

- 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.*

No remedy or clean-up goals have been selected at this time.

- 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 solid or liquid wastes, other than IDW, have been removed under an approved work plan.

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.*

- Implementation of a *Second Additional Site Assessment Work Plan*, submitted on 10/22/21 and approved on 11/3/21 in the amount of **\$108,601.18**. Change Order requests #1 and #2 were approved on 12/29/21 and 7/1/22 in the amounts of **\$17,608.28** and **\$12,995.76**, respectively, bringing the approved plan total to **\$129,209.46**. This application covers the performance of a final quarterly vapor monitoring event (#4), which was performed in January 2023 and reported on 2/8/23.
- Preparation and implementation of a *Third Additional Site Assessment Work Plan*, which was submitted on 9/21/23 and approved on 10/27/23 in the amount of **\$29,878.98**. The plan provided for the installation of five soil vapor wells and three sub-slab vapor pins on the Marion's Market Place property and a vapor sampling event to include the new vapor points and two existing vapor wells on the former Baker Oil property. The *Third Additional Site Assessment Report* was submitted by SPATCO on 1/19/24.
- Preparation of this reimbursement application (**\$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.*

SPATCO 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.*

SPATCO has included a "Soil Vapor Concentrations Map (with soil GRO data) from the *Third Additional Site Assessment Report* (1/19/24).

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

No additional data or graphs have been generated.



RECEIVED
MAR 15 2024
DEQ - RST

March 12, 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
MAR 13 2024
4:02 pm - Br

RE: Reimbursement Application # 5
Former Marion BP
210 Military Road
Marion, AR
DEQ ID #: 18000162; LUST #: 18-0144 *afin #18-0073a*

Dear Ms. Trotta:

Please find attached the Reimbursement Application #5 for the above referenced facility in the amount of \$31,426.21.

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



BAKER OIL COMPANY
Former Marion BP
210 Military Road, Marion, Arkansas 72364

January 4, 2023 through January 19, 2024
Facility ID: 18000162 LUST #: 18-0144 Claim Amount= \$31,426.21

This is the fifth reimbursement package for LUST #: 32-0036 and consists of one invoice totaling \$31,426.21. This reimbursement application is for the fourth and final quarterly vapor sampling event approved under the Second Additional Site Assessment Work Plan; and the preparation, implementation, and reporting of the Third Additional Site Assessment Work Plan.

The Second Additional Site Assessment workplan was requested on August 30, 2021. The work plan was submitted on October 22, 2021 and approved for implementation November 3, 2021. The last quarter report was submitted for DEQ on February 8, 2023.

Afterwards, in a letter dated August 8, 2023, the Department of Energy and Environment, Division of Environmental Quality's (DEQ's) Office of Land Resources - Assessment and Remediation Program (OLR-ARP) requested that JF Baker Oil Company prepare a Third Additional Site Assessment and Cost Estimate to further define the level and extent of the presence of petroleum vapors in the near-surface soils of the Marion Marketplace grocery parking lot and sub-slab vapors beneath the concrete slab of the grocery store adjoining Leaking Underground Storage Tank (LUST) site number 18-0144. The work plan and cost estimate were submitted on September 21, 2023 and approved for implementation on October 27, 2023.

The approved work plan provided for the installation of five (5) soil vapor wells and three (3) sub-slab vapor pins on the adjoining grocery store property and one targeted vapor sampling event to include the new vapor points and existing vapor wells VW9 and VW22 on the Former Marion BP.

The *Third Additional Site Assessment Report* was submitted on January 19, 2024. This report included summaries and results for the additional vapor assessment. The report indicated an anomalous benzene vapor high of 100,000 ug/m³ just outside the southeast corner of the grocery store building (VW28).

Remaining Workplan Balance from 2nd Additional Site Assessment: \$26,599.43
Total Approved Costs for 3rd Site Assessment: \$29,874.98
Current Reimbursement Request: \$31,426.21
Remaining Work Plan balance from 3rd Site Assessment Workplan: \$3,021.10

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.

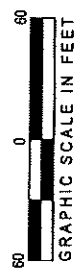
Regards,

A handwritten signature in black ink, appearing to read "Oriana Thompson", is written over a horizontal line.

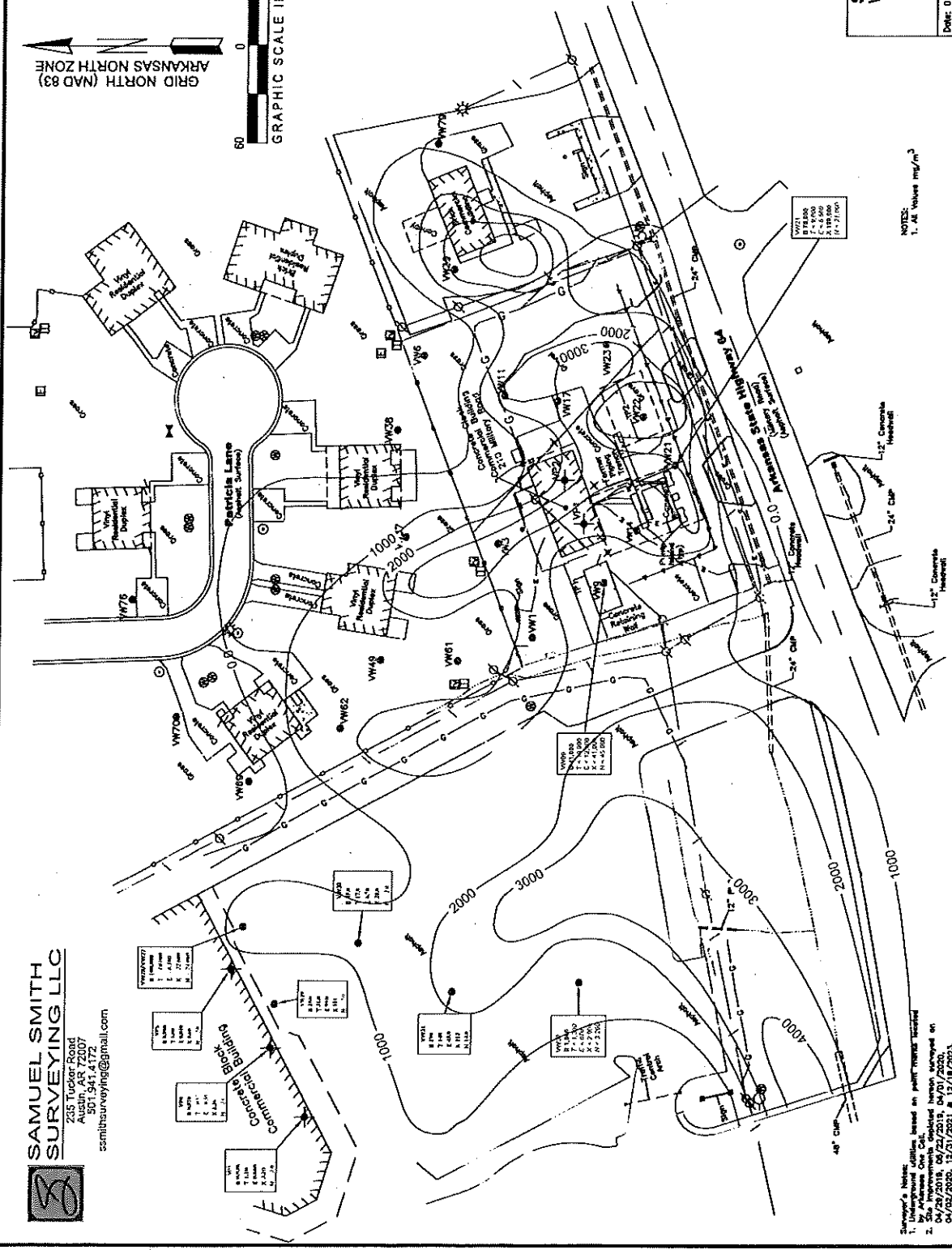
Oriana Thompson, M.S.
Environmental Division Manager



GRID NORTH (NAD 83)
ARIZONA NORTH ZONE



- LEGEND**
- MW1 MONITOR WELL W/ NUMBER
 - ⊕ VP3 SOIL VAPOR PIN W/ NUMBER
 - ⊕ VWT1 VAPOR WELL W/ NUMBER
 - ⊗ S1 SHELBY HOLE W/ NUMBER
 - ⊗ TP2 HISTORICAL TANK BASIN
 - ⊗ RECENT TANK BASIN
 - ⊗ SECURITY LAMP
 - ⊗ UTILITY POLE
 - ⊗ ANCHOR WIRE
 - AERIAL POWER LINE
 - BURIED ELECTRIC
 - TELEPHONE PEDESTAL
 - CABLE TV PEDESTAL
 - FIRE HYDRANT
 - WATER BLOW OFF
 - WATER METER
 - BURIED WATER LINE
 - SANITARY SEWER MANHOLE
 - SANITARY SEWER LINE
 - SANITARY SEWER CLEAN OUT
 - NATURAL GAS LINE
 - 6' WOOD FENCE
 - UNKNOWN BURIED UTILITY
 - PREVIOUS REMEDIATION PIPING
 - TOP OF CASING
 - GROUND
 - CONTOUR LINE W/ELEVATION
 - CONTOUR INTERVAL 1/2 FOOT
 - VERTICAL DATUM NAVD88



Facility ID# 180000162
LUST# 18-0144

**SOIL VAPOR CONCENTRATIONS
W/ GROUND IN SOIL CONTOURS (mg/kg)**

S23 T07N R08E
Spanish Land Grant 2324
210 Military Road
Marion, Crittenden County, Arkansas

Date: 01-12-2024 Scale: 1" = 60'
ACAD File No.: z:\acad\Southern Company\60028 Marion BP.dwg Figure:3

NOTES:
1. All Values mg/m³

SAMUEL SMITH SURVEYING LLC
235 Tucker Road
Tulsa, Oklahoma 74107
918.461.4172
ssmthsurveying@gmail.com

Surveyor's Notes:
1. This report is based on field notes taken by Samuel Smith Surveying LLC on 04/25/2018, 05/22/2019, 04/01/2020, 04/25/2020, 12/21/2021 & 12/18/2023.



**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: June 26, 2024

Subject: **Hob Nob Store (Shell)
20 Bradley Cove Road
Russellville, AR 72802
ID #58000133 LUST #58-0099 AFIN 58-00616**

A request for reimbursement (#3) for costs incurred during remediation of an or Underground Storage Tank (UST) site was received from the Responsible Party (RP) on April 19, 2024. The RP of this site reported a product release (#58-0099) on December 18, 2020, after finding a fuel leak around the threads of the automatic line leak detection sub-pump. The name and the address of the RP:

**Fletcher Oil Company, Inc.
Attn: Mark Fletcher
P.O. Box 387
Russellville, AR 72811**

The period covered by this application is January 24, 2024 through March 29, 2024. Remediation activities for which reimbursement is requested include: preparation and implementation of a Monitoring Well Decommissioning Work Plan and Cost Estimate and preparation of Reimbursement Application #3.

A “No Further Action” (NFA) determination was issued on April 15, 2024.

To date, a total of 9,255 gallons of liquids (including 62 gallons of free product gasoline) were recovered from the tankhold and three groundwater monitoring wells, along with an estimated 133 vapor-equivalent gallons of gasoline.

This application includes one (1) invoice from SPATCO Energy Solutions (SPATCO) totaling **\$10,382.56**. Included in SPATCO’s invoice are charges for SPATCO labor.

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

RECOMMENDATION:

The claimed cost of **\$10,382.56** 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:

Claim filed- Form TF-1	\$ 10,382.56
Less: Deductible	- 00.00
Less: Adjustments	- <u>00.00</u>
Total Net Claim	<u>\$ 10,382.56</u>

It is recommended that the claim made by the RP be considered in the amount of **\$10,382.56**.

Approved Work Plans

58000133 58-0099 HOB NOB STORE (SHELL)

	<u>Date</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	07/21/2021	Conditional Approval of IFPR & SAWP & C.E.	SPATCO	\$148,568.54
02	04/29/2022	Approval of Extended Abatement and Monitoring	SPATCO	\$49,866.03
03	02/26/2024	Approval of MWDWP & C.E.	SPATCO	\$10,678.70
				<u>\$209,113.27</u>

Approved Payments

58000133

580099

HOB NOB STORE (SHELL)

<u>Date Approved</u>	<u>Amount</u>
2 /23/2022	\$115,946.85
5 /31/2023	\$41,665.96
	<hr/>
	\$157,612.81
	<hr/> <hr/>

APPLICATION FOR REIMBURSEMENT
from the
PETROLEUM STORAGE TANK TRUST FUND

(1) ADEQ Facility Identification Number: 58000133

(2) Responsible Party Information:

Company Name Fletcher Oil Company, Inc
Contact Person Mr. Mark Fletcher
Address P.O. Box 387
City and State Russellville, AR
Zip Code 72811
Phone 501-968-4629

(3) Release Location

Facility Name Hob Nob Store (Shell)
Address 20 Bradley Cove Road
City and State Russellville, Arkansas 72802

(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 12/18/2020 Release (LUST) Number 58-0099

Facility ID# 58000133

Date 04/16/24

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

FLETCHER OIL CO INC

Mark Fletcher

Type/Print name of Owner/Operator or Responsible Party

Mark Fletcher

Signature of Owner/Operator or Responsible Party

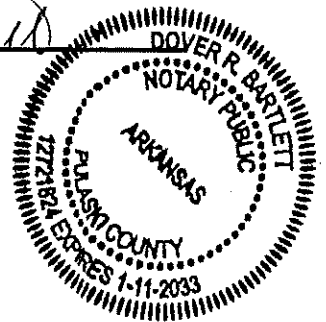
ACKNOWLEDGEMENT

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

Dover Bartlett
Notary Public

My Commission Expires:

1/11/2033

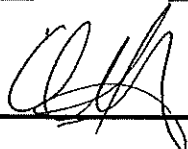


PROOF OF PAYMENT AFFIDAVIT

I, Oriana Thompson 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 Enviro. Dept. Mgr. of SPATCO Energy Solutions, I certify that, as of this date, SPATCO Energy Solutions has been paid in full by Mr. Mark Fletcher for the invoices contained in this reimbursement request:

Invoice Number	Invoice Date	Invoice Amount
93717897	4/16/2024	\$10,382.56
Total		\$10,382.56

Signed this 16th day of April, 2024



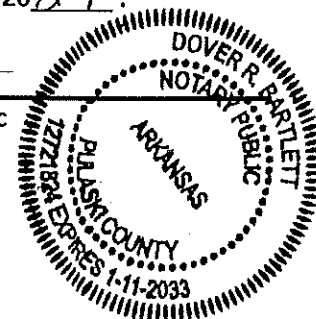
Oriana Thompson, Env. Dept. Mgr.

ACKNOWLEDGEMENT

Sworn to and subscribed before me this

16th day of April, 2024.

Dover R. Bartlett
Notary Public



My Commission Expires:

1/11/2033

Interim Request No.	3	COST SUMMARY SHEET			
Consultant /Responsible Party:		SPATCO Energy Solutions, LLC			
Facility Identification #:		58000133	Facility Name: Hob Nob Store (Shell)		
Dates current costs incurred:	From	01/24/24	to	03/29/24	Request Date: 04/16/24
COST SUMMARY					
1. DIRECT LABOR COST (attach labor recap)		Hours	Actual Cost		
Principal/Managerial		2.50	\$117.20		
Professional/Technical		28.75	\$977.19		
Support		8.00	\$152.00		
Totals		39.25	\$1,246.39		
Total Actual Labor Costs x 3					\$3,739.18
2. FIXED RATE COSTS (List by category - attach recap)		Actual Cost			
Equipment Rental		\$72.00			
Per Diem (meals only, with documented overnight stay)		\$0.00			
Mileage		\$197.40			
Other		\$0.00			
Total Fixed Rate Costs					\$269.40
3. OTHER DIRECT COSTS (List by category - attach recap)		Actual Cost			
Lodging		\$0.00			
Laboratory		\$0.00			
Subcontracts		\$4,894.75			
Supplies		\$0.00			
Other		\$0.00			
Total Other Direct Costs					\$4,894.75
4. Reimbursement Preparation Cost for RA#(s) <u>3</u>		(\$500 or \$1000)			\$500.00
5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)					\$9,403.33
6. Markup on Total Other Direct Costs (maximum 20%)					\$979.23
7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)					\$10,382.56
A. Total Reimbursement Requested to Date Including Above:					\$175,495.37
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):					\$157,612.81
E. Amount of this Request (same as line 7 above unless it is the 1st Request):					\$10,382.56

Consultant /Responsible Party: SPATCO Energy Solutions, LLC

Facility Identification # 58000133 Facility Name: Hob Nob Store (Shell)

Dates costs incurred: From 01/24/24 to 03/29/24 Request date: 04/16/24

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
PRINCIPAL/MANAGERIAL:						
01/24/24	93717897	O. Thompson_En. Dpt. Man	T1_Project Planning	1.00	\$46.88	\$46.88
03/11/24	93717897	O. Thompson_En. Dpt. Man	T3_Waste Management	0.50	\$46.88	\$23.44
03/25/24	93717897	O. Thompson_En. Dpt. Man	T4_Reporting	1.00	\$46.88	\$46.88
						\$0.00
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ADDITIONAL PRINC/MGR COSTS (from the Extra Direct Labor Page):
TOTAL PRINCIPAL/MANAGERIAL: 2.50 \$117.20

Interim Request No.	3	Page	5	of	16
Consultant /Responsible Party: SPATCO Energy Solutions, LLC					
Facility Identification # 58000133		Facility Name: Hob Nob Store (Shell)			
Dates costs incurred:	From	01/24/24	to	03/29/24	Request date: 04/16/24

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
PROFESSIONAL/TECHNICAL:						
01/25/24	93717897	D. Curry_PG	T1_Project Planning	4.00	\$33.65	\$134.60
01/26/24	93717897	D. Curry_PG	T1_Project Planning	0.50	\$33.65	\$16.83
01/29/24	93717897	D. Curry_PG	T1_Project Planning	3.50	\$33.65	\$117.78
01/29/24	93717897	J. Hemphill_PG	T1_Project Planning	1.00	\$39.90	\$39.90
01/30/24	93717897	D. Curry_PG	T1_Project Planning	2.00	\$33.65	\$67.30
03/11/24	93717897	D. Curry_PG	T4_Reporting	2.00	\$33.65	\$67.30
03/12/24	93717897	D. Curry_PG	T4_Reporting	1.50	\$33.65	\$50.48
03/20/24	93717897	D. Curry_PG	T2_MW Abandonmen	0.50	\$33.65	\$16.83
03/20/24	93717897	D. Curry_PG	T3_Waste Manageme	0.50	\$33.65	\$16.83
03/21/24	93717897	D. Curry_PG	T2_MW Abandonmen	8.00	\$33.65	\$269.20
03/22/24	93717897	D. Curry_PG	T4_Reporting	2.00	\$33.65	\$67.30
03/25/24	93717897	J. Hemphill_PG	T4_Reporting	1.00	\$39.90	\$39.90
03/25/24	93717897	D. Curry_PG	T4_Reporting	2.00	\$33.65	\$67.30
03/25/24	93717897	P. King_Staff Geo	T4_Reporting	0.25	\$22.67	\$5.67
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						\$0.00

ADDITIONAL PROF/TECH COSTS (from the Extra Direct Labor Page):						
TOTAL PROFESSIONAL/TECHNICAL COSTS:				28.75		\$977.19

Interim Request No. 3 Page 6 of 16

Consultant /Responsible Party: SPATCO Energy Solutions, LLC

Facility Identification # 58000133 Facility Name: Hob Nob Store (Shell)

Dates costs incurred: From 01/24/24 to 03/29/24 Request date: 04/16/24

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
SUPPORT:						
03/21/24	93717897	PP_Env. Tech	T2_MW Abandonment	6.00	\$19.00	\$114.00
03/21/24	93717897	PP_Env. Tech	T3_Waste Management	2.00	\$19.00	\$38.00
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ADDITIONAL SUPPORT COSTS (from the Extra Direct Labor Page):						
TOTAL SUPPORT COSTS:				8.00		\$152.00
TOTAL DIRECT LABOR COSTS:				39.25		\$1,246.39

Revised 01/2016

Interim Request No.	3	Page 7 of 16
Consultant /Responsible Party: SPATCO Energy Solutions, LLC		
Facility Identification # 58000133		Facility Name: Hob Nob Store (Shell)
Dates costs incurred:	From 01/24/24 to 03/29/24	Request date: 04/16/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	VENDOR AND WORK PLAN TASK	UNITS	RATE	AMOUNT
EQUIPMENT RENTAL					
03/21/24	93717897	T2_MW Dec. Dev. Pump	1	\$72.00	\$72.00
					\$0.00
					\$0.00
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ADDITIONAL EQUIPMENT RENTAL (from the Extra Fixed Rate Costs page):					
				TOTAL EQUIPMENT RENTAL:	\$72.00

Interim Request No.	3		Page	8	of	16
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Consultant /Responsible Party:	SPATCO Energy Solutions, LLC					
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Facility Identification #	58000133	Facility Name:	Hob Nob Store (Shell)	
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Dates costs incurred:	From	01/24/24	to	03/29/24	Request date:	04/16/24
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FIXED RATE COSTS DETAIL

DATE	INVOICE#	TRAVELER AND WORK PLAN TASK	# OF NIGHTS	RATE	AMOUNT
MEAL PER DIEM:					
					\$0.00
					\$0.00
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ADDITIONAL MEAL PER DIEM COSTS (from the Extra Fixed Rate Costs page):	
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TOTAL MEAL PER DIEM COSTS:	\$0.00
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Consultant /Responsible Party: SPATCO Energy Solutions, LLC

Facility Identification # 58000133 Facility Name: Hob Nob Store (Shell)

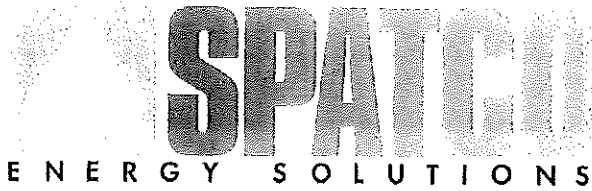
Dates costs incurred: From 01/24/24 to 03/29/24 Request date: 04/16/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	ROUTE AND WORK PLAN TASK	# OF MILES	RATE	AMOUNT
MILEAGE:					
01/30/24	93717897	T1_DC_MIL_office-deq-office	16.00	\$0.70	\$11.20
03/21/24	93717897	T2_DC_MIL_home-site-home	80.00	\$0.70	\$56.00
03/21/24	93717897	T2_PP_MIL_office-site	70.00	\$0.70	\$49.00
03/21/24	93717897	T2_PP_MIL_site-Futures_office	108.00	\$0.70	\$75.60
03/25/24	93717897	T4_PK_MIL_office-deq-office*	8.00	\$0.70	\$5.60
		*split with Lust 01-0107			\$0.00
					\$0.00
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					\$0.00

ADDITIONAL MILEAGE COSTS (from the Extra Fixed Rate Costs page): \$0.00

TOTAL MILEAGE COSTS: \$197.40



PLEASE MAKE REMITTANCE TO:
 PO BOX 5450
 CAROL STREAM, IL 60197-5450

FLETCHER OIL COMPANY, INC
 Fletcher@suddenlinkmail.com
 PO Box 387
 RUSSELLVILLE AR 72811

Invoice	
Number	93717897
Date	04/16/2024
Purchase Order Number	Mark Fletcher - T.F
Sales Order Number	1600659
Customer Number	1061287
Salesman#	259, Little Rock House
Sales Office	0057, Little Rock

Currency USD

Conditions:

Terms of payment Net 30
 Terms of delivery FOB SHIPPING POINT

PLUG AND ABANDON WELLS WORKPLAN, IMPLEMENTATION, AND REPORT

Item	Item Detail		
10	Material:	INSTALLATION PRICE	PLUG AND ABANDON WELLS WP AND IMPL.
	Quantity	UOM	Price
	1	EA	10,382.56
			Extended price
			10,382.56
Items total:			10,382.56
Invoice amount:			10,382.56

PAST DUE INVOICE SUBJECT TO 1% MONTHLY SERVICE CHARGE AFTER 30 DAYS FROM INVOICE DATE

Hob Nob /Fletcher Oil
P.O. Box 387
Russellville, AR 72811

LOCATION:
Hob Nob Shell Station
20 Bradley Cove Rd
Russellville, AR 72811
Facility ID: 58-000133
LUST:58-0099
Job: E-57-0199

DATE	ITEM DESCRIPTION	NUMBER OF UNITS	UNIT RATE	TOTAL
	Task 1_Project Planning - Labor shown includes reviewing ADEQ EA, obtaining contractor quotes, and plan/cost estimate preparation.			
1/24/2024	O. Thompson_Enviro Dept Manager	1	\$140.64	\$140.64
1/25/2024	D Curry_Professional Geologist, PG	4	\$100.96	\$403.84
1/26/2024	D Curry_Professional Geologist, PG	0.5	\$100.96	\$50.48
1/29/2024	D Curry_Professional Geologist, PG	3.5	\$100.96	\$353.36
1/29/2024	J Hemphill_Professional Geologist, PG	1	\$119.71	\$119.71
1/30/2024	D Curry_Professional Geologist, PG	2	\$100.96	\$201.92
1/30/2024	DC_MIL_office-DEQ-office	16	\$0.70	\$11.20
	Task 3_Waste Management - Labor shown includes waste disposal manifesting and disposal at Future Energy Services (Damascus) & scheduling of tech.			
3/11/2024	O. Thompson_Enviro Dept Manager	0.5	\$140.64	\$70.32
	Task 4_ Reporting - Labor shown includes report completion, review, and filing.			
3/11/2024	D Curry_Professional Geologist, PG	2	\$100.96	\$201.92
3/12/2024	D Curry_Professional Geologist, PG	1.5	\$100.96	\$151.44
	Task 2_ Monitoring Well Abandonment- Labor shown includes management, prep, deprep, MW P&A activity, fluid abatement and travel.			
3/20/2024	D Curry_Professional Geologist, PG	0.5	\$100.96	\$50.48
	Task 3_Waste Management - Labor shown includes waste disposal manifesting and disposal at Future Energy Services (Damascus) & scheduling of tech.			
3/20/2024	D Curry_Professional Geologist, PG	0.5	\$100.96	\$50.48
	Task 2_ Monitoring Well Abandonment- Labor shown includes management, prep, deprep, MW P&A activity, fluid abatement and travel.			
3/21/2024	D Curry_Professional Geologist, PG	8	\$100.96	\$807.68
3/21/2024	DC_MIL_home-site-home	80	\$0.70	\$56.00
3/21/2024	EQ_SPATCO Rental_Dev. Pump	1	\$72.00	\$72.00
3/21/2024	P Polk_Env. Tech	6	\$57.00	\$342.00
3/21/2024	PP_MIL_office-site	70	\$0.70	\$49.00
	Task 3_Waste Management - Labor shown includes waste disposal manifesting and disposal at Future Energy Services (Damascus) & scheduling of tech.			
3/21/2024	P Polk_Env. Tech	2	\$57.00	\$114.00

DATE	ITEM DESCRIPTION	NUMBER OF UNITS	UNIT RATE	TOTAL
3/21/2024	P Polk_MIL_site-Futures-office	108	\$0.70	\$75.60
Task 4_ Reporting - Labor shown includes report completion, review, and filing.				
3/22/2024	D Curry_Professional Geologist, PG	2	\$100.96	\$201.92
3/25/2024	J Hemphill_Professional Geologist, PG	1	\$119.71	\$119.71
3/25/2024	D Curry_Professional Geologist, PG	2	\$100.96	\$201.92
3/25/2024	O. Thompson_Enviro Dept Manager	1	\$140.64	\$140.64
3/25/2024	P King_Geologist	0.25	\$68.00	\$17.00
3/25/2024	P King_MIL_office-DEQ-office (split w/ LUST 01-0107)	8	\$0.70	\$5.60
	Prepare RA#1 over \$50,000	1	\$500.00	\$500.00
DATE	THIRD PARTY EXPENSES			
3/29/2024	126540_Future Energy_Fluid Disposal	1	\$47.70	\$47.70
3/28/2024	239796_EWI_Drilling Con.	1	\$5,826.00	\$5,826.00
			INVOICE TOTAL	\$10,382.56



ARKANSAS

ENERGY & ENVIRONMENT

MEMORANDUM

Bridget Green 5/3/24
To: Jacqueline Trotta, Trust Fund Administrator
Assessment & Remediation Program, Office of Land Resources *BW 5/2/24*

Through: Blake Whittle, P.G., Groundwater Branch Manager
Joshua Stevens, P.G., Geologist Supervisor, Regulated Storage Tanks *JKS 5/1/24*
A & R Program, OLR

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

Date: April 29, 2024

Subject: Technical Review of Reimbursement Application #3
For Time Period: January 24 – March 29, 2024
Amount Requested: \$10,382.56
Hob Nob Store ["Fletcher Oil Company, Inc."]
20 Bradley Cove Road
Russellville, Arkansas 72802
LUST #58-0099 ID #58000133 AFIN: 58-00616

The following is in response to your memo to me dated April 22, 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? – LUST Case #58-0099 was closed with a "No Further Action" determination on April 15, 2024. An Exposure Assessment had been issued by OLR RST on January 9, 2024 which determined that satisfactory recovery of free product had been achieved, that no human health exposures were present and that natural attenuation processes had been demonstrated to be effective in the elimination of minor impact to surface water in a nearby ditch.*
- 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 establishment of clean-up goals was not necessary.*
- 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 75 gallons of free product gasoline were recovered from UST tankhold observation wells soon after the release was discovered in December 2020. An unspecified amount of gasoline has been recovered from absorbent booms placed along the impacted*

street ditch on the north side of the facility over the past two years and three months. During a series of four 12-hour Mobile Dual Phase Extraction events conducted in September-October 2021, a total of 9,255 gallons of liquids (including 62 gallons of free product gasoline) were recovered from the tankhold and three groundwater monitoring wells, along with an estimated 133 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.* – Fletcher Oil Company, Inc. is requesting reimbursement for:
- Preparation and implementation of a *Monitoring Well Decommissioning Work Plan and Cost Estimate* submitted by SPATCO on 1/30/24 and approved on 2/26/24 in the amount of **\$10,678.70**.
 - Preparation of the current Trust Fund Reimbursement Application #3 (**\$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.* – SPATCO 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 SPATCO'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.



RECEIVED

APR 18 2024

ST 3:30pm

April 17, 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

APR 19 2024

DEQ - RST

RE: Reimbursement Application # 3
Hob Nob Shell Station
20 Bradley Cove Road
Russellville, Arkansas 72811
Pope County
DEQ ID #: 58000133 | AFIN: 658-00616 | LUST #: 58-0099

Dear Ms. Trotta:

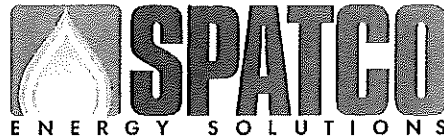
Please find attached the Reimbursement Application #3 for the above referenced facility in the amount of \$10,382.56. RA#3 is for preparation and monitoring well decommissioning activities.

Should you have any questions or require additional information, please do not hesitate to call Oriana Thompson at (501) 376-6333 or I at (501) 904-2509.

Sincerely,
On Behalf of SPATCO Energy Solutions, LLC,

A handwritten signature in cursive script that reads "Diana Curry".

Diana Curry, P.G.
Staff Geologist



PROJECT SUMMARY

Hob Nob / Fletcher Oil

Robert Fletcher

20 Bradley Cove Road, Russellville, Arkansas 72802

January 24, 2024 through March 29, 2024

Facility ID: 58000133; LUST: 58-0099; AFIN: 58-00616; Leak Date: December 18, 2020

The attached reimbursement application (RA#3) for \$10,382.56 represents costs associated with preparation and implementation of monitoring well decommissioning activities at the above referenced LUST site.

RA#1 - Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ), Assessment and Remediation Program, Office of Land Resources (OLR), prepared a Preliminary Assessment (PA) for LUST Case 58-0099. The PA recommended that an environmental investigation be conducted in accordance with 40 CFR §280.65. Emergency response and initial release activity initiated on December 18, 2020. Site Assessment field work and interim free product removal activities field work was initiated on July 23, 2021. The report of assessment findings was submitted to the RST Division on December 13, 2021.

RA#2 - Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ), Assessment and Remediation Program, Office of Land Resources (OLR), requested Extended Abatement and Monitoring for one year (four quarters), which included gauging and sampling of monitoring wells and surface water in the ditch.

RA#3/Final - The Exposure Assessment was completed and the RST staff concluded that a corrective action plan was not necessary for the referenced facility. On January 22, 2024, a letter requesting the preparation of a work plan and cost estimate for decommissioning the monitoring wells was issued. The requested *Monitoring Well Decommissioning Work Plan and Cost Estimate* was submitted on January 30, 2024 and was approved for implementation on February 26, 2024. The approved total for the decommissioning activity was \$10,678.70.

Decommissioning activity was completed on March 21, 2024. The *Monitoring Well Decommissioning Report* was submitted to the RST on March 25, 2024. The Notification of LUST Case Closure letter was issued on April 15, 2024.

Activities onsite included:

- Monitoring well decommissioning of nine (9) monitoring wells;
- Fluid disposal of fluids produced during the decommissioning activity and the management of the derived waste; and
- Completion and submission of the *Monitoring Well Decommissioning Report*.

The following is the RA Request #3 information:

RA Request #3 Information:	Monitoring Well Decommissioning
Initial Work Plan & Cost Estimate (Jan 30, 2024)	\$10,678.70
Work Plan Approval Amount (Feb. 26, 2024)	\$10,678.70
Amount of Request	\$10,382.56

The SPATCO Energy Solutions, LLC appreciates the Division of Environmental Quality's continued cooperation on this project. If you have any questions, please contact me at 501-376-6333.

Regards,

Diana Curry, P.G.
Project Manager | Staff Geologist

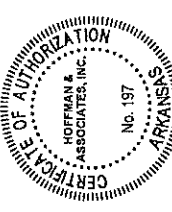
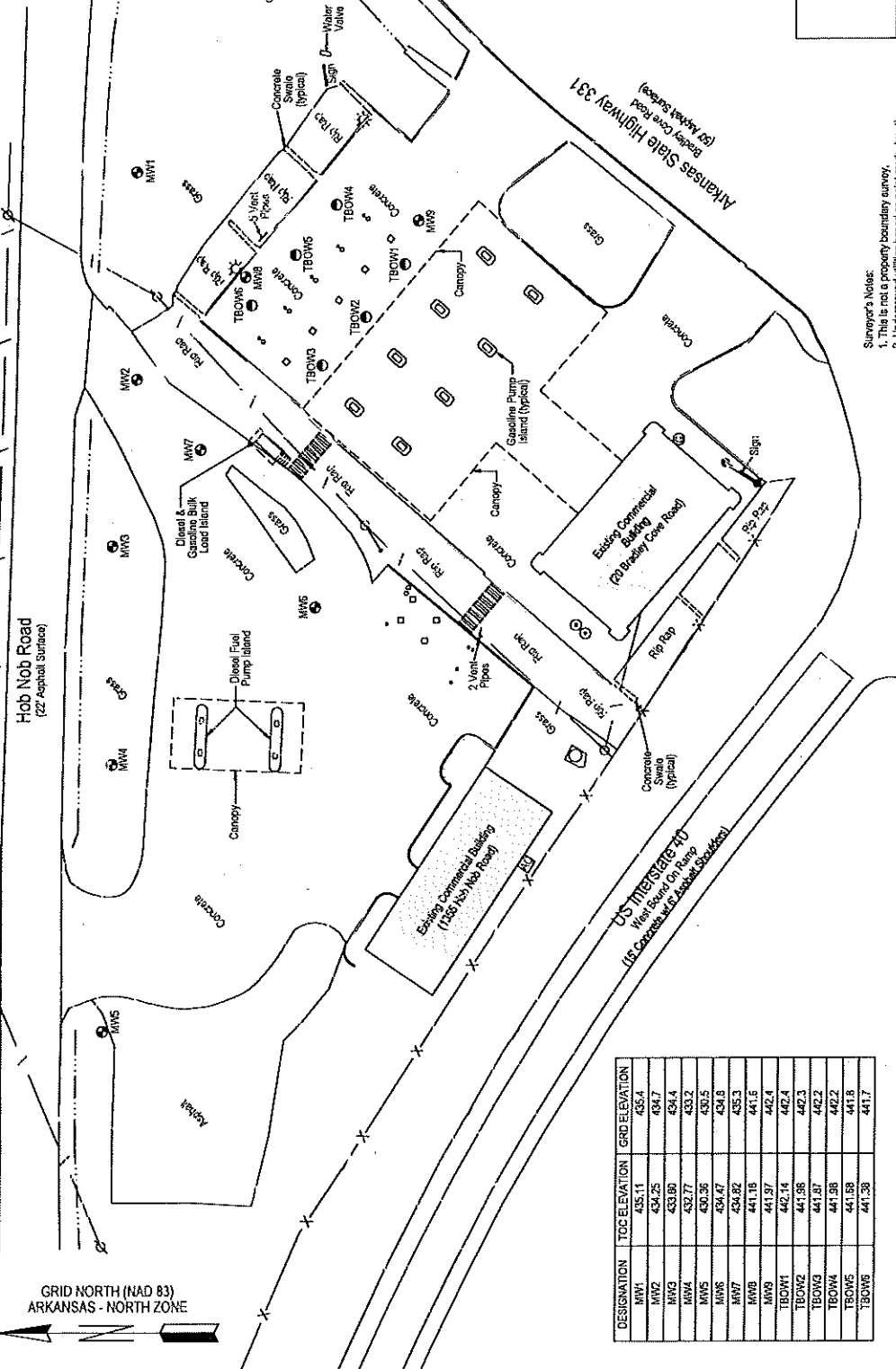


LEGEND

- MW#1 MONITOR WELL LOCATION W/ NUMBER
- TBCW#1 TANK BASIN OBSERVATION WELL W/ NUMBER
- TOC UTILITY POLE
- SECURITY LAMP
- AERIAL POWER LINE
- ANCHOR WIRE
- SANITARY SEWER MANHOLE
- GAS METER
- FENCING
- TOP OF CASING
- GROUND
- CONTOUR LINE W/ ELEVATION
- CONTOUR INTERVAL: 1'-FOOT
- DATUM: NAVD88

HOFFMAN ASSOCIATES INC
 235 Tucker Road • Austin, AR 72027
 Call: 501.941.4172
 Surveying & Engineering
 hanna-inc.com

GRID NORTH (NAD 83)
 ARKANSAS - NORTH ZONE



SAMUEL E. SMITH
 ARKANSAS LICENSED PROFESSIONAL LAND
 SURVEYOR CERTIFICATE NO. 130
 HOFFMAN & ASSOCIATES, INC.
 235 TUCKER ROAD
 AUSTIN, ARKANSAS 72027
 EXPIRATION DATE: JUNE 30, 2023
 ADEQ Facility ID: 59000113
 ADEQ LUST File: 58-0059

SITE MAP

FLETCHER OIL COMPANY
 20 Bradley Cove Road &
 1355 Hob Nob Road
 S02 T07N R20W, Russellville,
 Pope County, Arkansas

Date: 11-24-2021
 ACAD File No.: E:\BERRY\SPATCO\06077.dwg

- Surveyor's Notes:
1. This is not a property boundary survey.
 2. Underground utilities depicted on point marks by others.
 3. Site improvements depicted herein surveyed on 10-04-2021 & 10-05-2021.

DESIGNATION	TOC ELEVATION	GRID ELEVATION
MW1	435.11	436.4
MW2	434.25	434.7
MW3	433.80	434.4
MW4	433.77	433.2
MW5	430.36	430.5
MW6	434.47	434.8
MW7	434.82	435.3
MW8	441.18	441.5
MW9	441.37	442.4
TBCW1	442.14	442.4
TBCW2	441.38	442.3
TBCW3	441.87	442.2
TBCW4	441.98	442.2
TBCW5	441.88	441.8
TBCW6	441.38	441.7

Scale 1" = 40'



ARKANSAS

ENERGY & ENVIRONMENT

MEMORANDUM OF REVIEW
Reimbursement Request
Petroleum Storage Tank Trust Fund

From: Petroleum Storage Tank Trust Fund Staff

Date: June 26, 2024

Subject: **I-30 Superstore (Former Roosevelt Exxon)**
612 East Roosevelt Road
Little Rock, AR 72206
ID #60000407 LUST #60-0973 AFIN 60-00260

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 December 21, 2023. The RP of this site reported a product release (#60-0973) on November 30, 2022, after diesel was found in the monitoring wells. The name and the address of the RP:

Magness Oil Company
Attn: Jeff Magness
167 Tucker Cemetery Road
Gassville, AR 72635

The period covered by this application is December 1, 2022 through August 25, 2023. Remediation activities for which reimbursement is requested include: implementation and reporting of Initial Response to Release (IRR) activities, planning and full implementation of a Site Assessment Work Plan and Cost Estimate, and preparation of Reimbursement Application #1.

To date, two (2) 55-gallon drums of contaminated soil and debris were removed during the Initial Response to a Release activities.

This application includes two (2) invoices from SPATCO Energy Solutions (SPATCO) totaling \$59,161.77. Included in SPATCO's invoices are charges from: EWI (\$22,075.00), Samuel Smith Surveying (\$4,000.00), Waypoint (\$1,735.00), Waste Management (\$1,392.62), and GPRS (\$950.00).

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

RECOMMENDATION:

The claimed cost of **\$59,161.77** 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:

Claim filed- Form TF-1	\$ 59,161.77
Less: Deductible	- 7,500.00
Less: Adjustments	- <u>00.00</u>
Total Net Claim	<u>\$ 51,661.77</u>

It is recommended that the claim made by the RP be considered in the amount of **\$51,661.77**.

60000407-01 LUST #60-0973 BG, JT

Approved Work Plans

60000407 60-0973 ROOSEVELT EXXON

	<u>Date</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	05/25/2023	Approval of SAWP & C.E.	SPATCO	\$63,946.76
				<u>\$63,946.76</u>

APPLICATION FOR REIMBURSEMENT
from the
PETROLEUM STORAGE TANK TRUST FUND

(1) ADEQ Facility Identification Number: 60000407

(2) Responsible Party Information:

Company Name Magness Oil Co
Contact Person Jeff Magness
Address 167 W. Center St.
City and State Gassville, AR
Zip Code 72635
Phone 870-425-4353

(3) Release Location

Facility Name I-30 Superstore (Former Roosevelt Exxon)
Address 612 East Roosevelt Rd
City and State Little Rock, AR 72206

(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 11/30/2022 Release (LUST) Number 60-0973

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

Magness Oil Company

Jeff Magness
Type/Print name of Owner/Operator or Responsible Party

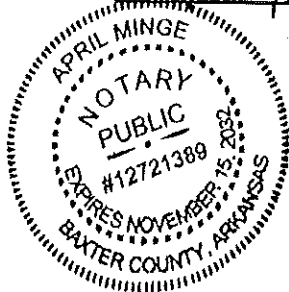
[Signature]
Signature of Owner/Operator or Responsible Party

ACKNOWLEDGEMENT

Sworn to and subscribed before me this 29th day of Nov, 2023

[Signature]
Notary Public

My Commission Expires: 11/15/2032



PROOF OF PAYMENT AFFIDAVIT

I, Oriana Thompson 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 Enviro. Dept. Mgr of SPATCO Energy Solutions, I certify that, as of this date, SPATCO Energy Solutions has been paid in full by Magness Oil Company for the invoices contained in this reimbursement request:

Invoice Number	Invoice Date	Invoice Amount
93644048	9/26/2023	\$57,737.05
93561475	1/31/2023	\$1,424.72
Total		\$59,161.77

Signed this 9th day of January, 2024

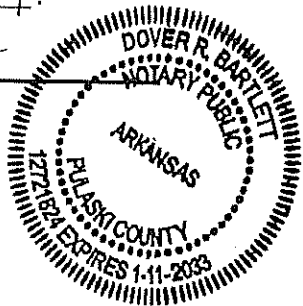
[Signature]
 Env. Dept. Mgr

ACKNOWLEDGEMENT

Sworn to and subscribed before me this 9th day of January, 2024.

[Signature]
 Notary Public

My Commission Expires: 1/11/33



Interim Request No.	1	COST SUMMARY SHEET			
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Consultant /Responsible Party:	SPATCO Energy Solutions / Magness Oil Co.				
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Facility Identification #:	60000407	Facility Name:	Former Roosevelt Exxon		
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Dates current costs incurred:	From	12/01/22	to	08/25/23	Request Date:	10/23/23
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COST SUMMARY						
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1. DIRECT LABOR COST (attach labor recap)	Hours	Actual Cost	
Principal/Managerial	4.00	\$153.84	
Professional/Technical	187.00	\$5,779.68	
Support	20.00	\$480.00	
Totals	211.00	\$6,413.52	

Total Actual Labor Costs x 3			\$19,240.56
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2. FIXED RATE COSTS (List by category - attach recap)	Actual Cost	
Equipment Rental	\$742.50	
Per Diem (meals only, with documented overnight stay)	\$0.00	
Mileage	\$164.85	
Other	\$0.00	
Total Fixed Rate Costs		

3. OTHER DIRECT COSTS (List by category - attach recap)	Actual Cost	
Lodging	\$0.00	
Laboratory	\$2,210.00	
Subcontracts	\$28,498.34	
Supplies	\$96.98	
Other	\$872.89	
Total Other Direct Costs		

4. Reimbursement Preparation Cost for RA#(s) <u>1</u> (\$500 or \$1000)	\$1,000.00
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5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)	\$52,826.12
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6. Markup on Total Other Direct Costs (maximum 20%)	\$6,335.65
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7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)	\$59,161.77
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A. Total Reimbursement Requested to Date Including Above:	\$59,161.77
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B. Less Amount Deductible (\$25,000, \$15,000, or \$7,500)	\$7,500.00
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C. Less Amount Previously Retained/Disallowed by RST:	\$0.00
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D. Less Amount Previously Received (Reimbursed by ADEQ):	\$0.00
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E. Amount of this Request (same as line 7 above unless it is the 1st Request):	\$51,661.77
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Consultant /Responsible Party: SPATCO Energy Solutions / Magness Oil Co.
 Facility Identification # 60000407 Facility Name: Former Roosevelt Exxon

Dates costs incurred: From 12/01/22 to 08/25/23 Request date: 10/23/23

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
PRINCIPAL/MANAGERIAL:						
03/08/23	93644048	O. Thompson	T1_Work Plan Prep	1.00	\$38.46	\$38.46
03/31/23	93644048	O. Thompson	T1_Work Plan Prep	1.00	\$38.46	\$38.46
08/23/23	93644048	O. Thompson	T5_Date Ev.& Rpt Prep.	2.00	\$38.46	\$76.92
						\$0.00
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						\$0.00
ADDITIONAL PRINC/MGR COSTS (from the Extra Direct Labor Page):						
TOTAL PRINCIPAL/MANAGERIAL:				4.00		\$153.84

Interim Request No. 1 Page 5 of 16
 Consultant /Responsible Party: SPATCO Energy Solutions / Magness Oil Co.
 Facility Identification # 60000407 Facility Name: Former Roosevelt Exxon
 Dates costs incurred: From 12/01/22 to 08/25/23 Request date: 10/23/23

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
PROFESSIONAL/TECHNICAL:						
12/15/22	93561475	D. Curry_Geologist	Soil profile for disp.	1.00	\$30.00	\$30.00
01/03/23	93561475	D. Curry_Geologist	Com&Sub IRR	2.00	\$30.00	\$60.00
02/16/23	93644048	D. Curry_Geologist	T1_Work Plan Prep	1.00	\$30.00	\$30.00
02/17/23	93644048	D. Curry_Geologist	T1_Work Plan Prep	2.00	\$30.00	\$60.00
02/21/23	93644048	D. Curry_Geologist	T1_Work Plan Prep	4.00	\$30.00	\$120.00
03/06/23	93644048	D. Curry_Geologist	T1_Work Plan Prep	3.50	\$30.00	\$105.00
03/07/23	93644048	D. Curry_Geologist	T1_Work Plan Prep	2.00	\$30.00	\$60.00
03/08/23	93644048	D. Curry_Geologist	T1_Work Plan Prep	5.00	\$30.00	\$150.00
03/08/23	93644048	J.Hemphill_PG	T1_Work Plan Prep	1.50	\$36.06	\$54.09
03/09/23	93644048	D. Curry_Geologist	T1_Work Plan Prep	2.00	\$30.00	\$60.00
03/10/23	93644048	D. Curry_Geologist	T1_Work Plan Prep	3.00	\$30.00	\$90.00
03/21/23	93644048	D. Curry_Geologist	T1_Work Plan Prep	4.00	\$30.00	\$120.00
03/22/23	93644048	D. Curry_Geologist	T1_Work Plan Prep	3.00	\$30.00	\$90.00
03/24/23	93644048	D. Curry_Geologist	T1_Work Plan Prep	2.50	\$30.00	\$75.00
03/29/23	93644048	D. Curry_Geologist	T1_Work Plan Prep	1.50	\$30.00	\$45.00
03/29/23	93644048	J.Hemphill_PG	T1_Work Plan Prep	1.00	\$36.06	\$36.06
03/30/23	93644048	D. Curry_Geologist	T1_Work Plan Prep	3.00	\$30.00	\$90.00
03/30/23	93644048	J.Hemphill_PG	T1_Work Plan Prep	2.00	\$36.06	\$72.12
03/31/23	93644048	D. Curry_Geologist	T1_Work Plan Prep	3.00	\$30.00	\$90.00
04/03/23	93644048	D. Curry_Geologist	T1_Work Plan Prep	1.00	\$30.00	\$30.00
04/03/23	93644048	J.Hemphill_PG	T1_Work Plan Prep	0.50	\$36.06	\$18.03
07/07/23	93644048	D. Curry_Geologist	T2_S & GW Invest	2.00	\$30.00	\$60.00
07/11/23	93644048	D. Curry_Geologist	T2_S & GW Invest	2.00	\$30.00	\$60.00
07/14/23	93644048	D. Curry_Geologist	T2_S & GW Invest	2.00	\$30.00	\$60.00
07/17/23	93644048	D. Curry_Geologist	T2_S & GW Invest	11.00	\$30.00	\$330.00
07/17/23	93644048	J.Hemphill_PG	T2_S & GW Invest	9.00	\$36.06	\$324.54
07/18/23	93644048	D. Curry_Geologist	T2_S & GW Invest	11.00	\$30.00	\$330.00
07/18/23	93644048	J.Hemphill_PG	T2_S & GW Invest	9.00	\$36.06	\$324.54
07/19/23	93644048	D. Curry_Geologist	T2_S & GW Invest	11.50	\$30.00	\$345.00
07/20/23	93644048	D. Curry_Geologist	T2_S & GW Invest	10.50	\$30.00	\$315.00
07/24/23	93644048	D. Curry_Geologist	T2_S & GW Invest	0.50	\$30.00	\$15.00
07/25/23	93644048	D. Curry_Geologist	T2_S & GW Invest	1.00	\$30.00	\$30.00
ADDITIONAL PROF/TECH COSTS (from the Extra Direct Labor Page)				69.00		\$2,100.30
TOTAL PROFESSIONAL/TECHNICAL COSTS				187.00		\$5,779.68

Interim Request No. 1 Page 5a of 16
 Consultant /Responsible Party: SPATCO Energy Solutions / Magness Oil Co.
 Facility Identification # 60000407 Facility Name: Former Roosevelt Exxon
 Dates costs incurred: From 12/01/22 to 08/25/23 Request date: 10/23/23

EXTRA DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
Duplicate this page as needed to record each type of Direct Labor						
07/27/23	93644048	D. Curry_Geologist	T2_S & GW Invest	4.00	\$30.00	\$120.00
07/27/23	93644048	D. Curry_Geologist	T3_Env. Sample An.	1.00	\$30.00	\$30.00
07/27/23	93644048	D. Curry_Geologist	T4_Waste Man.	1.00	\$30.00	\$30.00
07/31/23	93644048	D. Curry_Geologist	T5_Date Eval & RPT	9.00	\$30.00	\$270.00
08/01/23	93644048	D. Curry_Geologist	T5_Date Eval & RPT	4.00	\$30.00	\$120.00
08/02/23	93644048	D. Curry_Geologist	T2_S & GW Invest	6.00	\$30.00	\$180.00
08/03/23	93644048	D. Curry_Geologist	T2_S & GW Invest	3.00	\$30.00	\$90.00
08/08/23	93644048	D. Curry_Geologist	T5_Date Eval & RPT	6.00	\$30.00	\$180.00
08/09/23	93644048	D. Curry_Geologist	T5_Date Eval & RPT	3.00	\$30.00	\$90.00
08/14/23	93644048	D. Curry_Geologist	T5_Date Eval & RPT	3.00	\$30.00	\$90.00
08/15/23	93644048	D. Curry_Geologist	T5_Date Eval & RPT	2.00	\$30.00	\$60.00
08/15/23	93644048	J.Hemphill_PG	T5_Date Eval & RPT	4.00	\$36.06	\$144.24
08/15/23	93644048	D. Curry_Geologist	T3_Env. Sample An.	1.00	\$30.00	\$30.00
08/16/23	93644048	D. Curry_Geologist	T5_Date Eval & RPT	2.00	\$30.00	\$60.00
08/16/23	93644048	D. Curry_Geologist	T4_Waste Man.	1.00	\$30.00	\$30.00
08/17/23	93644048	D. Curry_Geologist	T5_Date Eval & RPT	4.00	\$30.00	\$120.00
08/21/23	93644048	D. Curry_Geologist	T5_Date Eval & RPT	4.00	\$30.00	\$120.00
08/22/23	93644048	D. Curry_Geologist	T5_Date Eval & RPT	4.00	\$30.00	\$120.00
08/23/23	93644048	D. Curry_Geologist	T5_Date Eval & RPT	3.00	\$30.00	\$90.00
08/23/23	93644048	J.Hemphill_PG	T5_Date Eval & RPT	1.00	\$36.06	\$36.06
08/24/23	93644048	D. Curry_Geologist	T5_Date Eval & RPT	2.50	\$30.00	\$75.00
08/25/23	93644048	D. Curry_Geologist	T5_Date Eval & RPT	0.50	\$30.00	\$15.00
						\$0.00
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						\$0.00
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						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
Manually enter these totals on the corresponding "Direct Labor" page:				69.00		\$2,100.30

Interim Request No. 1

Consultant /Responsible Party: SPATCO Energy Solutions / Magness Oil Co.

Facility Identification # 60000407

Facility Name: Former Roosevelt Exxon

Dates costs incurred: From 12/01/22 to 08/25/23

Request date: 10/23/23

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
SUPPORT:						
12/28/22	93561475	Tech_M. Pena	Soil/debris disposal	2.50	\$25.00	\$62.50
07/19/23	93644048	Tech_P. King	T2_S & GW Invest	1.50	\$25.00	\$37.50
07/20/23	93644048	Tech_P. King	T2_S & GW Invest	1.00	\$25.00	\$25.00
07/28/23	93644048	Tech_M. Pena	T4_Waste Man.	4.00	\$25.00	\$100.00
07/28/23	93644048	Tech_A. Rogers	T4_Waste Man.	4.00	\$20.00	\$80.00
08/02/23	93644048	Tech_P. King	T2_S & GW Invest	6.00	\$25.00	\$150.00
08/17/23	93644048	Tech_P. King	T4_Waste Man.	1.00	\$25.00	\$25.00
						\$0.00
						\$0.00
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						\$0.00
						\$0.00
						\$0.00
						\$0.00

ADDITIONAL SUPPORT COSTS (from the Extra Direct Labor Page):

TOTAL SUPPORT COSTS: 20.00 \$480.00

TOTAL DIRECT LABOR COSTS: 211.00 \$6,413.52

Consultant /Responsible Party: SPATCO Energy Solutions / Magness Oil Co.

Facility Identification # 60000407 Facility Name: Former Roosevelt Exxon

Dates costs incurred: From 12/01/22 to 08/25/23 Request date: 10/23/23

FIXED RATE COSTS DETAIL

DATE	INVOICE#	ROUTE AND WORK PLAN TASK	# OF MILES	RATE	AMOUNT
MILEAGE:					
12/28/22	93561475	MP MIL_office-landfill-office	25.00	\$0.70	\$17.50
01/03/22	93561475	DC MIL_office-deq-office	16.00	\$0.70	\$11.20
03/08/23	93644048	DC MIL_office-site-office	8.00	\$0.70	\$5.60
04/03/23	93644048	JH MIL_office-deq-office	16.00	\$0.70	\$11.20
07/07/23	93644048	DC MIL_office-site-office	8.00	\$0.70	\$5.60
07/11/23	93644048	DC MIL_office-site-office	8.00	\$0.70	\$5.60
07/17/23	93644048	DC MIL_office-site-office	8.00	\$0.70	\$5.60
07/17/23	93644048	JH MIL_office-site-office	8.00	\$0.70	\$5.60
07/17/23	93644048	DC MIL_office-site-office	8.00	\$0.70	\$5.60
07/17/23	93644048	JH MIL_office-site-office	8.00	\$0.70	\$5.60
07/19/23	93644048	DC MIL_office-site-office	8.00	\$0.70	\$5.60
07/19/23	93644048	PK MIL_office-pu drum-site-office	20.00	\$0.70	\$14.00
07/20/23	93644048	DC MIL_office-site-office	8.00	\$0.70	\$5.60
07/20/23	93644048	PK MIL_office-site-fedex-site	14.50	\$0.70	\$10.15
07/24/23	93644048	DC MIL_office-site-office	8.00	\$0.70	\$5.60
07/27/23	93644048	DC MIL_office-site-office	8.00	\$0.70	\$5.60
08/02/23	93644048	DC MIL_office-site-office	8.00	\$0.70	\$5.60
08/02/23	93644048	PK MIL_office-site-office	8.00	\$0.70	\$5.60
08/15/23	93644048	DC MIL_office-site-office	8.00	\$0.70	\$5.60
08/17/23	93644048	PK MIL_office-site-office	16.00	\$0.70	\$11.20
08/25/23	93644048	DC MIL_office-deq-office	16.00	\$0.70	\$11.20
					\$0.00
					\$0.00
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					\$0.00
					\$0.00
					\$0.00
					\$0.00
					\$0.00
					\$0.00
					\$0.00
ADDITIONAL MILEAGE COSTS (from the Extra Fixed Rate Costs page):					\$0.00
TOTAL MILEAGE COSTS:					\$164.85

Interim Request No. 1 Page 10 of 16

Consultant /Responsible Party: SPATCO Energy Solutions / Magness Oil Co.

Facility Identification # 60000407 Facility Name: Former Roosevelt Exxon

Dates costs incurred: From 12/01/22 to 08/25/23 Request date: 10/23/23

FIXED RATE COSTS DETAIL

DATE	INVOICE#	DESCRIPTION AND WORK PLAN TASK	AMOUNT
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OTHER:

ADDITIONAL OTHER FIXED RATE COSTS (from Extra Fixed Rate Costs page):	\$0.00
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TOTAL OTHER FIXED RATE COSTS:	\$0.00
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TOTAL FIXED RATE COSTS:	\$907.35
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Interim Request No. 1 Page 13 of 16
Consultant /Responsible Party: SPATCO Energy Solutions / Magness Oil Co.
Facility Identification # 60000407 Facility Name: Former Roosevelt Exxon
Dates costs incurred: From 12/01/22 to 08/25/23 Request date: 10/23/23

OTHER DIRECT COSTS DETAIL

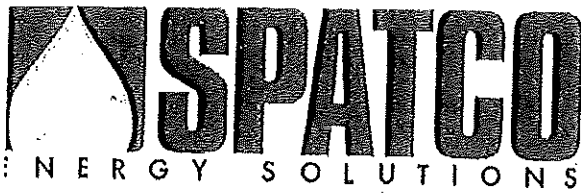
DATE | **INVOICE#** | **DESCRIPTION AND WORK PLAN TASK** | **AMOUNT**

SUBCONTRACTS:

01/03/23	93561475	2181_WM-2 drums of cont. soil_IRR related	\$208.75
07/13/23	679894	GPRS_T2_utility locate	\$950.00
07/28/23	232734	EWI_T2_sb and mw installation	\$22,075.00
08/22/23	43	SSS_T2_boundary survey and site map	\$4,000.00
08/01/23	63001	WM_T4_soil disposal	\$1,183.87
08/23/23	227809	Valicor_T4_water disposal	\$80.72

ADDITIONAL SUBCONTRACTS COSTS (from the Extra Other Direct Costs page): \$0.00

TOTAL SUBCONTRACTS COSTS: \$28,498.34



PLEASE MAKE REMITTANCE TO:
 PO BOX 896984
 CHARLOTTE, NC 28289-6984

MAGNESS OIL COMPANY
 167 TUCKER CEMETARY ROAD
 GASSVILLE AR 72635

Ship-to address
 ROOSEVELT EXXON
 612 EAST ROOSEVELT
 LITTLE ROCK AR 72206

Invoice	
Number	93644048
Date	09/26/2023
Purchase Order Number	JEFF - T.F.
Sales Order Number	1482311
Customer Number	1039428
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 ASSESMENT WORPLAN, IMPLEMENTATION, AND REPORT - T.F.

Item	Material:	Quantity	UOM	INSTALLATION PRICE	Item Detail	Installation - Contract Price	Price	Extended price
10		1	EA				57,737.05	57,737.05
Items total:								57,737.05
Invoice amount:								57,737.05

PAST DUE INVOICE SUBJECT TO 1% MONTHLY SERVICE CHARGE AFTER 30 DAYS FROM INVOICE DATE

Magness Oil
 Jeff Magness Oil Co
 167 W Center St
 Gassville, AR 72635

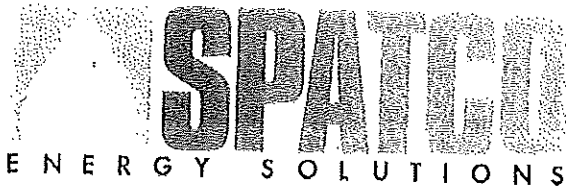
LOCATION:
 Roosevelt Exxon
 612 East Roosevelt Rd
 Little Rock, AR
 Facility ID: 60000407
 LUST: 60-0973
 Job: E-57-0155

DATE	ITEM DESCRIPTION	NUMBER OF UNITS	UNIT RATE	TOTAL
Task 1 Work Plan Preparation				
2/16/2023	Project Geologist_DC	1	\$90.00	\$90.00
2/17/2023	Project Geologist_DC	2	\$90.00	\$180.00
2/21/2023	Project Geologist_DC	4	\$90.00	\$360.00
3/6/2023	Project Geologist_DC	3.5	\$90.00	\$315.00
3/7/2023	Project Geologist_DC	2	\$90.00	\$180.00
3/8/2023	Project Geologist_DC	5	\$90.00	\$450.00
3/8/2023	DC-MIL_office-site-office	8	\$0.70	\$5.60
3/8/2023	Enviro. Dept. Manager_OT	1	\$115.38	\$115.38
3/8/2023	Professional Geologist, PG_JH	1.5	\$108.18	\$162.27
3/9/2023	Project Geologist_DC	2	\$90.00	\$180.00
3/10/2023	Project Geologist_DC	3	\$90.00	\$270.00
3/21/2023	Project Geologist_DC	4	\$90.00	\$360.00
3/22/2023	Project Geologist_DC	3	\$90.00	\$270.00
3/24/2023	Project Geologist_DC	2.5	\$90.00	\$225.00
3/29/2023	Project Geologist_DC	1.5	\$90.00	\$135.00
3/29/2023	Professional Geologist, PG_JH	1	\$108.18	\$108.18
3/30/2023	Project Geologist_DC	3	\$90.00	\$270.00
3/30/2023	Professional Geologist, PG_JH	2	\$108.18	\$216.36
3/31/2023	Project Geologist_DC	3	\$90.00	\$270.00
3/31/2023	Enviro. Dept. Manager_OT	1	\$115.38	\$115.38
4/3/2023	Project Geologist_DC	1	\$90.00	\$90.00
4/3/2023	Professional Geologist, PG_JH	0.5	\$108.18	\$54.09
4/3/2023	JH_MIL_office-deq-office	16	\$0.70	\$11.20
Task 2 Soil and Groundwater Investigation				
7/7/2023	Project Geologist_DC	2	\$90.00	\$180.00
7/7/2023	DC-MIL_office-site-office	8	\$0.70	\$5.60
7/11/2023	Project Geologist_DC	2	\$90.00	\$180.00
7/11/2023	DC-MIL_office-site-office	8	\$0.70	\$5.60
7/14/2023	Project Geologist_DC	2	\$90.00	\$180.00
7/17/2023	Project Geologist_DC	11	\$90.00	\$990.00
7/17/2023	DC-MIL_office-site-office	8	\$0.70	\$5.60
7/17/2023	SPATCO EQ_PID_weekly (7/17 to 7/20)	1	\$255.00	\$255.00
7/17/2023	SPATCO_EQ_IP_weekly (7/17 to 7/20)	1	\$157.50	\$157.50
7/17/2023	Professional Geologist, PG_JH	9	\$108.18	\$973.62
7/17/2023	JH-MIL_office-site-office	8	\$0.70	\$5.60

DATE	ITEM DESCRIPTION	NUMBER OF UNITS	UNIT RATE	TOTAL
7/18/2023	Project Geologist_DC	11	\$90.00	\$990.00
7/18/2023	DC-MIL_office-site-office	8	\$0.70	\$5.60
7/18/2023	Professional Geologist, PG_JH	9	\$108.18	\$973.62
7/18/2023	JH-MIL_office-site-office	8	\$0.70	\$5.60
7/19/2023	Project Geologist_DC	11.5	\$90.00	\$1,035.00
7/19/2023	DC-MIL_office-site-office	8	\$0.70	\$5.60
	Task 4_Waste Management			
7/19/2023	Tech_P. King	1.5	\$75.00	\$112.50
7/19/2023	PK_office-site-office	20	\$0.70	\$14.00
	Task 2 Soil and Groundwater Investigation			
7/20/2023	Project Geologist_DC	10.5	\$90.00	\$945.00
7/20/2023	DC-MIL_office-site-office	8	\$0.70	\$5.60
7/20/2023	Tech_P. King	1	\$75.00	\$75.00
7/20/2023	PK_office-site-office	14.5	\$0.70	\$10.15
7/24/2023	Project Geologist_DC	0.5	\$90.00	\$45.00
7/24/2023	DC-MIL_office-site-office	8	\$0.70	\$5.60
7/25/2023	Project Geologist_DC	1	\$90.00	\$90.00
7/27/2023	Project Geologist_DC	4	\$90.00	\$360.00
7/27/2023	DC-MIL_office-site-office	8	\$0.70	\$5.60
7/27/2023	EQ_IP	1	\$55.00	\$55.00
7/27/2023	EQ_Development Pump	1	\$95.00	\$95.00
	Task 3_Environmental Sample Analysis Review			
7/27/2023	Project Geologist_DC	1	\$90.00	\$90.00
	Task 4_Waste Management			
7/27/2023	Project Geologist_DC	1	\$90.00	\$90.00
7/28/2023	Tech_MP	4	\$75.00	\$300.00
7/28/2023	Tech_AR	4	\$60.00	\$240.00
	Task 5_Date Evaluation and Report Preperation			
7/31/2023	Project Geologist_DC	9	\$90.00	\$810.00
8/1/2023	Project Geologist_DC	4	\$90.00	\$360.00
	Task 2 Soil and Groundwater Investigation			
8/2/2023	Project Geologist_DC	6	\$90.00	\$540.00
8/2/2023	DC-MIL_office-site-office	8	\$0.70	\$5.60
8/2/2023	EQ_QED Sample Pump	1	\$50.00	\$50.00
8/2/2023	EQ_QED Comp.- Controller	1	\$75.00	\$75.00
8/2/2023	EQ_IP	1	\$55.00	\$55.00
8/2/2023	Tech_P King	6	\$75.00	\$450.00
8/2/2023	PK-MIL_office-site-office	8	\$0.70	\$5.60
8/3/2023	Project Geologist_DC	3	\$90.00	\$270.00

DATE	ITEM DESCRIPTION	NUMBER OF UNITS	UNIT RATE	TOTAL
Task 5_Date Evaluation and Report Preperation				
8/8/2023	Project Geologist_DC	6	\$90.00	\$540.00
8/9/2023	Project Geologist_DC	3	\$90.00	\$270.00
8/14/2023	Project Geologist_DC	3	\$90.00	\$270.00
8/15/2023	Project Geologist_DC	2	\$90.00	\$180.00
8/15/2023	DC-MIL_office-slte-office	8	\$0.70	\$5.60
8/15/2023	Professional Geologist, PG_JH	4	\$108.18	\$432.72
Task 3_Environmental Sample Analysis Review				
8/15/2023	Project Geologist_DC	1	\$90.00	\$90.00
Task 5_Date Evaluation and Report Preperation				
8/16/2023	Project Geologist_DC	2	\$90.00	\$180.00
Task 4_Waste Management				
8/16/2023	Project Geologist_DC	1	\$90.00	\$90.00
8/17/2023	Tech_P King	1	\$75.00	\$75.00
8/17/2023	PK-MIL_office-slte-office	16	\$0.70	\$11.20
Task 5_Date Evaluation and Report Preperation				
8/17/2023	Project Geologist_DC	4	\$90.00	\$360.00
8/21/2023	Project Geologist_DC	4	\$90.00	\$360.00
8/22/2023	Project Geologist_DC	4	\$90.00	\$360.00
8/23/2023	Project Geologist_DC	3	\$90.00	\$270.00
8/23/2023	Professional Geologist, PG_JH	1	\$108.18	\$108.18
8/23/2023	Enviro. Dept. Manager_OT	2	\$115.38	\$230.76
8/24/2023	Project Geologist_DC	2.5	\$90.00	\$225.00
8/25/2023	Project Geologist_DC	0.5	\$90.00	\$45.00
8/25/2023	DC-MIL_office-DEQ-office	16	\$0.70	\$11.20
	Prepare RA#1 over \$50,000	1	\$1,000.00	\$1,000.00

DATE	ITEM DESCRIPTION	NUMBER OF UNITS	UNIT RATE	TOTAL
	THIRD PARTY EXPENSES			
7/13/2023	GPRS_Boring clearing	1	\$1,140.00	\$1,140.00
7/28/2023	EWI_Drilling cont	1	\$26,490.00	\$26,490.00
8/22/2023	00043_SSS_Site Survey	1	\$4,800.00	\$4,800.00
8/1/2023	WM_soil disposal_11 drums(7/28/23)	1	\$1,420.64	\$1,420.64
8/23/2023	Valicor_Water disposal	1	\$96.86	\$96.86
				\$0.00
			INVOICE TOTAL	\$57,737.05



PLEASE MARK REMITTANCE TO:
 PO BOX 896984
 CHARLOTTE, NC 28289-8984

MAGNESS OIL COMPANY
 167 TUCKER CEMETARY ROAD
 GASSVILLE AR 72635

Ship-to address
 ROOSEVELT EXXON
 612 EAST ROOSEVELT
 LITTLE ROCK AR 72206

Invoice	
Number	93561475
Date	01/31/2023
Purchase Order Number	Cecilia/Jeff
Sales Order Number	1433754
Customer Number	1039428
Salesman#	259, Little Rock House
Sales Office	0057, Little Rock

Currency USD

Conditions:

Terms of payment Net 30
 Terms of delivery FOB SHIPPING POINT

1. Mobilize to site. Troubleshoot unleaded line. Replaced packer o-ring and leak detectors. Retest. Test pass. Observed diesel in monitor wells. Entire Fuel System Test. Tanks, lines, leak detector, spill buckets, etc. Failed diesel line. Emptied line. Identified leak location using a helium detector - see attached sheet for details.
2. File 7-day notice, break concrete, Uncover line. Helium trace. Identified leak location. Repaired piping. Purged line. Line failed again. Identified faulty impact valve. Replaced impact valve, Repurge. Retest. Test passed. Replaced spill buckets - see attached sheet for details.
3. Profile soil to landfill and write initial response to a release report - see attached sheet for details.

Item	Material:	UOM	INSTALLATION PRICE	Item Detail	Price	Extended price
10				Installation - Contract Price		
	Quantity	UOM		Price		Extended price
	1	EA		15,353.19		15,353.19
20				Installation - Contract Parts		
	Quantity	UOM		Price		Extended price
	1	EA		3,197.74		3,197.74
Items total:						18,550.93
Total Tax						1,600.02
Invoice amount:						20,150.95

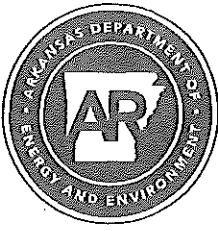
PAST DUE INVOICE SUBJECT TO A MONTHLY SERVICE CHARGE AFTER 30 DAYS FROM INVOICE DATE

8303 University Executive Park Drive, Suite 400 Charlotte, NC 28262
 704-596-4373 800-477-2026 FAX 704-593-7700
 www.spalco.com
 FED. I.D. #34-3846075

Magness Oil
 167 Tucker Cemetary Rd
 Gassville, AR 72635

Location
 Roosevelt Exxon
 612 E. Roosevelt Rd
 Little Rock, AR 72206

DATE	DESCRIPTION	UNITS	UNIT PRICE	TOTAL PRICE
12/1/22-	Mobilize to site. Troubleshoot unleaded line. Replaced packer o-ring and			
12/5/22	leak detectors. Retest. Test pass. Observed diesel in monitor wells. Entire Fuel System Test. Tanks, lines, leak detector, spill buckets, etc. Failed diesel line. Emptied line. Identified leak location using a helium detector.			
	Technician#1	27.00	85.00	2295.00
	Technician#2	27.00	85.00	2295.00
	Helium Gas - Helium detector	1.00	650.00	650.00
	Mobilization	3.00	45.00	135.00
12/6/2022-	File 7-day notice, break concrete, Uncover line. Helium trace. Identified			
12/16/22	leak location. Repaired piping. Purged line. Line failed again. Identified faulty impact valve. Replaced impact valve, Repurge. Retest. Test passed. Replaced spill buckets.			
	Technician#1	40.00	85.00	3400.00
	Technician#2	40.00	85.00	3400.00
	Mobilize	3.00	45.00	135.00
	Saw	1.00	150.00	150.00
	MiniEx, Hammer rental	1.00	847.47	847.47
	Concrete	1.00	441.00	441.00
	Parts	1.00	3197.74	3197.74
	Mobilization	4.00	45.00	180.00
	Profile soil & dispose at landfill			
12/15/2022	Geologist	1.00 ✓	90.00 ✓	90.00
12/28/2022	Technician	2.50 ✓	75.00 ✓	187.50
	Landfill fees	1.00 ✓	250.50 ✓	250.50
	Drum	2.00 ✓	53.46 ✓	106.92
	Lab Analysis	1.00 ✓	216.00 ✓	216.00
	Lab Analysis	1.00 ✓	354.00 ✓	354.00
	Sorbents	25.00 ✓	0.44 ✓	11.10
	Miles	25.00 ✓	0.70	17.50
	Write Initial Response to a Release Report - Deliver to ADEQ			
1/3/2023	Geologist	2.00 ✓	90.00 ✓	180.00
	Miles	16.00 ✓	0.70	11.20
	TOTAL CHARGES			18550.93



ARKANSAS

ENERGY & ENVIRONMENT

MEMORANDUM

To: *Bridget Green 5/21/24*
Jacqueline Trotta, Trust Fund Administrator
Assessment & Remediation Program, Office of Land Resources

Through: Blake Whittle, P.G., Groundwater Branch Manager *BW 5/20/24*
A & R Program, OLR

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

Date: May 17, 2024

Subject: Technical Review of Reimbursement Application #1
For Time Period: December 1, 2022 to August 25, 2023
Amount Requested: \$51,661.77
I-30 Superstore / Roosevelt Exxon [Magness Oil]
612 East Roosevelt
Little Rock, AR
Facility ID #60000407 LUST Case #60-0973 AFIN #60-00260

The following is in response to your memo to me dated January 3, 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 currently in Site Investigation. A Site Assessment Report was received August 25, 2023.

- 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 has not yet been selected at this time.

- 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.*

Two (2) 55-gal. drums of contaminated soil and debris were removed during the Initial Response to a Release 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.*

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

- Implementation and reporting of Initial Response to a Release (IRR) activity.
- Planning and full implementation of a Site Assessment Work Plan and Cost Estimate, approved on May 25, 2023.
- 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 may conflict 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 has provided a detailed project summary which reasonable 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 a map of soil contamination identified during Site Assessment activities; however, a printing error prevents the overlay tables from drawing. I have attached the corresponding Table 2, from the *Site Assessment Report*.

- 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.

Table 2 - Soil Analytical Results Summary

Site Assessment Report
 612 East Roosevelt Rd
 Little Rock, AR

Sample # - (depth)	PID (ppm)	TPH-DRO (C10-C28) mg/kg	TPH-GRO (C6-C10) mg/kg	Benzene mg/kg	Toluene mg/kg	Ethylbenzene mg/kg	Total Xylenes mg/kg	Naphthalene mg/kg
Soil Boring Completion July 17-20, 2023								
230717-SB1-7.5'	13.7	4.78	<0.662	<0.008	<0.041	<0.008	<0.008	<0.041
230717-SB2-20'	0.0	<3.33	<0.690	<0.009	<0.045	<0.009	<0.009	<0.045
230718-SB3-7.5'	13.0	<3.33	<0.578	<0.006	<0.031	<0.006	<0.006	<0.031
230718-SB4-2.5'	2.5	4.98	<0.575	<0.009	<0.048	<0.009	<0.009	<0.048
230719-SB5-5'	18.2	4.80	<0.952	<0.005	<0.028	<0.005	<0.005	<0.028
230719-SB6-2.5'	5.7	3.70	<0.637	<0.009	<0.047	<0.009	<0.009	<0.047
230719-SB7-2.5'	1.5	<3.33	<0.568	<0.008	<0.044	<0.008	<0.008	<0.044
230720-SB8-2.5'	160.0	4.65	3.08	<0.006	<0.030	<0.006	<0.006	<0.030
230720-SB9-7.5'	0.5	<3.33	<0.699	<0.007	<0.039	<0.007	<0.007	<0.039

BOLD Exceeds DEQ PTP Guidelines
Italic Less than Method Quantitation Limit



PROJECT SUMMARY

I-30 Superstore
612 East Roosevelt Rd
Little Rock, Arkansas 72206
December 1, 2022 through August 25, 2023
Facility ID: 60000407 | LUST: 60-0973 | AFIN: 60-00260 | Leak Date: November 30, 2022

The attached reimbursement application for \$51,661.77 represents costs associated with preparation and implementation of site assessment activities at the above-referenced LUST site for \$59,161.77 minus a deductible of \$7,500.00.

A failed line test on the unleaded line was reported and a suspected release was also conveyed on November 30, 2022 and LUST Case # 60-0973 was opened. The line was repaired and then retested by SPATCO and received a passing test on December 1, 2022. On December 1, 2022, the tank basin observation wells were also checked with bailers and diesel fuel was found to be present in the observation wells. An entire fuel system test was requested by the Inspector. SPATCO tested the entire fuel system and confirmed a leak on the diesel lines. The premium spill bucket and diesel spill bucket also failed testing. During the repair activity, soil and debris were contained in two 55-gallon drums and soil samples were then collected from the in-place backfill material from the diesel line and from below the spill buckets. The samples were placed on ice and delivered to Arkansas Analytical Inc. (AAI) on December 7, 2022. On December 8, 2022, Mr. Chacon referred the case to the technical staff. After the repairs were completed (12/01-05/2022, 12/15/22), the diesel line and two spill buckets were retested and passing test results were recorded. The analytical results and passing test results were submitted in the Initial Response Report (IRR) on January 3, 2023.

The site reconnaissance and receptor survey were conducted by Mr. Brady Johnson, DEQ Technical Branch Case Manager on January 4, 2023. The *Preliminary Assessment* was issued to the case file on January 6, 2023 and a letter requesting a *Site Assessment Work Plan and Cost Estimate* was issued on February 6, 2023. The Trust Fund eligibility letter was issued on February 14, 2023. SPATCO discussed the general scope of the assessment with OLR-ARP staff and on behalf of Magness Oil Company, Mr. Jeff Magness. SPATCO Energy Solutions, LLC submitted the requested *Site Assessment Work Plan & Cost Estimate Work Plan* on April 3, 2023. A revised work plan was requested and the *Revised Site Assessment Work Plan & Cost Estimate* was submitted on April 26, 2023. ARP-OLR issued approval of \$63,946.76 for the revised plan implementation in a letter dated May 25, 2023.

Site Assessment field work was initiated on July 7, 2023. The report of assessment findings was submitted to the RST Division on August 25, 2023.

Activities onsite have included:

- The completion of 9 soil borings. All of the borings were converted to 2-inch monitoring wells (maximum depth of 15-feet on 8 borings and 20-feet on 1 boring);
- Subsurface investigation to determine the occurrence of groundwater beneath the property, soil vapor potential and define the level and extent of hydrocarbon impact to both soil and groundwater;
- Topographic survey to document the locations and elevations of soil and groundwater sampling locations;
- Soil, groundwater analyses;

1201 Cypress Street, North Little Rock, AR 72114
501-376-6333 | www.spatco.com



- Management of assessment-derived waste; and
- Completion and submission of the *Site Assessment Report* documenting findings.

The following is the RA Request #1 information:

RA Request #1 Information:	IRR, Site Assessment Activity
Revised Work Plan & Cost Estimate	\$63,946.76
Work Plan Approval Amount	\$63,946.76
Total Reimbursement Request	\$59,161.77
Deductible	-\$7,500.00
Amount of Request	\$51,661.77

The SPATCO Energy Solutions, LLC appreciates the Division of Environmental Quality's continued cooperation on this project. If you have any questions, please contact me at 501-376-6333.

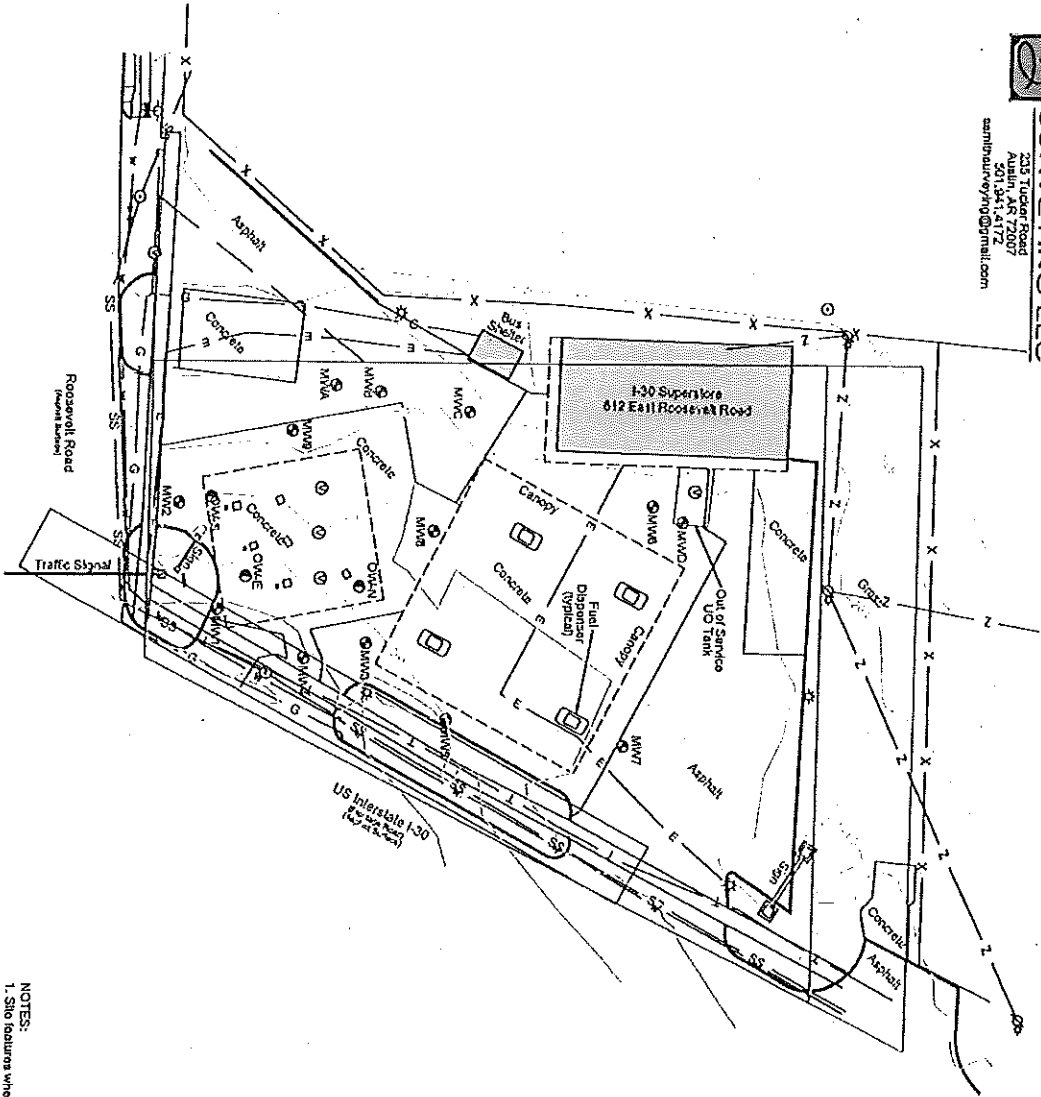
Regards,

A handwritten signature in cursive script that reads "Diana Curry".

Diana Curry
Project Manager | Geologist, M.S.



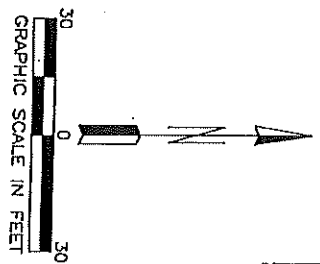
**SAMUEL SMITH
SURVEYING LLC**
235 Tucker Road
Auburn, AR 72007
501.241.4172
sam@surveying.com



NOTES:
1. Site features shown located on-ground on 08-08-2023 & 08-16-2023.
2. Locations of underground utilities based upon on-ground point, name and flag by others.
3. This is not a boundary survey. See AGSIS for record survey.

WELL DESIGNATION	TOP OF CASING	GROUND
MW1	259.43	259.3
MW2	261.77	262.1
MW3	260.30	260.7
MW4	259.47	259.9
MW5	260.71	261.0
MW6	262.45	262.6
MW7	261.97	262.3
MW8	261.28	262.7
MW9	263.08	263.3
MW10	263.51	263.6
OW1	263.19	263.3
OW2	263.35	263.5
OW3	262.60	262.8
OW4	261.63	261.9
OW5	260.65	260.3
OW6	260.96	261.4

Completion date:
SB1-2-07-17-2023
SB3-4-07-18-2023
SB5-7-07-19-2023
SB8-9-07-20-2023



LEGEND

- MW1 MONITOR WELL W/ NUMBER
- DOME TANK BASIN WELL W/ DIRECTION
- WATER LINE
- FIRE HYDRANT
- WATER VALVE
- SANITARY SEWER MANHOLE
- SANITARY SEWER LINE
- GAS VALVE
- GAS LINE
- ELECTRIC LINE
- TELEPHONE LINE
- UTILITY POLE W/ LAMP
- AERIAL POWER LINE
- 3"-2" VENT PIPE
- FUEL FILL PIPE
- 6" BARBED WIRE FENCING
- CONTOUR LINE W/ ELEVATION
- CONTOUR INTERVAL 1'-FOOT
- DTM: NAD83

Soil TPH-DRO, TPH-GRO & Benzene Concentrations mg/Kg

140 SUPERSTORE / SUPER ROOSEVELT EXXON)
612 EAST SUPER ROOSEVELT
LITTLE ROCK, PULASKI COUNTY, ARKANSAS

DATE: 06-21-2023 Scale: 1" = 30'
4000 File No: 01 West (2023)-1-30-2023 (0000)

PROJECT # E-57-0136
ADEG Facility ID# 00000497
ADEG LUG# 00-0072
APR# 00-00250





**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: June 26, 2024

Subject: **Marmaduke Chevron
300 South 3rd Street
Marmaduke, AR 72443
ID #28000045 LUST #28-0029 AFIN 28-00346**

A request for reimbursement (#9) for costs incurred during remediation of an Underground Storage Tank (UST) site was received from the Responsible Party (RP) on March 29, 2024. The RP of this site reported a gasoline release (#28-0029) on December 1, 2015, after soil samples taken in the product piping trench indicated high TPH-GRO concentration during permanent tank closure. The name and the address of the RP:

**Eubanks Oil Company, Inc.
Attn: Laurie Eubanks
3607 Fieldstone Drive
Paragould, AR 72450**

The period covered by this application is November 30, 2022, through March 11, 2024. Remediation activities for which reimbursement is requested include: planning of a 4th Additional Site Assessment Work Plan, Cost Estimate, and preparation of Reimbursement Application #9.

To date, five (5) 24-hour MDPE events have removed approximately 343 gallons of vapor equivalent product and approximately 22,157 gallons of water.

This application includes one (1) invoice from Environmental Pollution Consultants, Inc. (EPC) totaling **\$4,388.00**. Included in EPC's invoice are charges for labor (\$1,296.00).

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

RECOMMENDATION:

The claimed cost of **\$4,388.00** 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:

Claim filed- Form TF-1	\$4,388.00
Less: Deductible	- 00.00
Less: Adjustments	<u>- 00.00</u>
Total Net Claim	<u>\$4,388.00</u>

It is recommended that the claim made by the RP be considered in the amount of **\$4,388.00**.

Approved Work Plans

28000045 28-0029 MARMADUKE CHEVERON

	<u>Date</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	07/11/2016	Site Assessment Work Plan	EPC	\$43,732.10
02	09/27/2016	C.O. #1 to SAWP	EPC	\$1,200.00
03	06/13/2017	Revised Addn'l Site Assessment Work Plan	EPC	\$33,029.55
04	01/29/2018	C.O. #1 to the Additional Site Assessment Work Plan	EPC	\$4,997.40
05	06/15/2018	2nd Additional Site Assessment Work Plan	EPC	\$47,605.60
06	09/27/2019	3rd Additional Site Assessment Work Plan	EPC	\$14,238.91
07	11/15/2021	Approval of FPRWP & C. E.	EPC	\$211,203.16
				<hr/>
				\$356,006.72
				<hr/> <hr/>

Approved Payments

28000045

280029

MARMADUKE CHEVERON

<u>Date Approved</u>	<u>Amount</u>
2 /28/2017	\$25,459.25
2 /27/2018	\$27,041.63
7 /25/2018	\$7,834.30
1 /30/2019	\$40,903.67
4 /29/2020	\$13,531.76
4 /27/2022	\$60,727.10
12/7 /2022	\$53,885.38
3 /29/2023	\$31,568.68
	<hr/>
	\$260,951.77
	<hr/>

APPLICATION FOR REIMBURSEMENT
from the
PETROLEUM STORAGE TANK TRUST FUND

(1) ADEQ Facility Identification Number: 28000045

(2) Responsible Party Information:

Company Name Eubanks Oil Company, Inc.

Contact Person Laurie Eubanks

Address 3607 Fieldstone Dr.

City and State Paragould, Arkansas

Zip Code 72450

Phone 870-215-3517

(3) Release Location

Facility Name Marmaduke Chevron

Address 300 South 3rd Street

City and State Marmaduke, Arkansas 72443

(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 12/1/2015

Release (LUST) Number 28-0029

Facility ID# 28000045

Date 03/12/24

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

Eubanks Oil Company, Inc.

Laurie Eubanks

Type/Print name of Owner/Operator or Responsible Party

Laurie Eubanks

Signature of Owner/Operator or Responsible Party

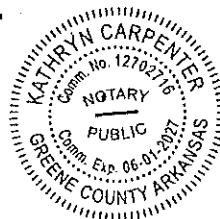
ACKNOWLEDGEMENT

Sworn to and subscribed before me this 19th day of March, 2024

Kathryn Carpenter

Notary Public

My Commission Expires: 06-01-27



Facility ID# 28000045


Date 03/12/24

PROOF OF PAYMENT AFFIDAVIT

I, David 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 Eubanks Oil/Laurie Eubanks for the invoices contained in this reimbursement request:

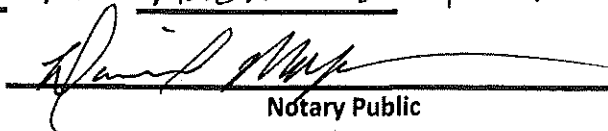
Invoice Number	Invoice Date	Invoice Amount
Marm-012	3/11/2024	\$4,388.00
Total		\$4,388.00

Signed this 32nd day of MARCH, 2024.

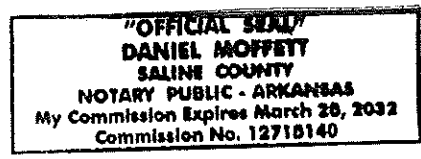

 David Diehl / President

ACKNOWLEDGEMENT

Sworn to and subscribed before me this 22 day of March 2024.


 Notary Public

My Commission Expires: 03/28/2032



Interim Request No.	9	COST SUMMARY SHEET			
Consultant /Responsible Party:		Environmental Pollution Consultants/Eubanks Oil Company, Inc.			
Facility Identification #:		28000045	Facility Name: Marmaduke Chevron		
Dates current costs incurred:		From	11/30/22	to	03/11/24
				Request Date:	03/11/24
COST SUMMARY					
1. DIRECT LABOR COST (attach labor recap)		Hours	Actual Cost		
Principal/Managerial		2.00	\$108.00		
Professional/Technical		22.00	\$1,188.00		
Support		0.00	\$0.00		
Totals		24.00	\$1,296.00		
Total Actual Labor Costs x 3			\$3,888.00		
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		\$0.00			
Other		\$0.00			
Total Fixed Rate Costs		\$0.00			
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)		9	(\$500 or \$1000)		\$500.00
5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)		\$4,388.00			
6. Markup on Total Other Direct Costs (maximum 20%)		\$0.00			
7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)		\$4,388.00			
A. Total Reimbursement Requested to Date Including Above:		\$274,669.65			
B. Less Amount Deductible (\$25,000, \$15,000, or \$7,500)		\$7,500.00			
C. Less Amount Previously Retained/Disallowed by RST:		\$1,829.88			
D. Less Amount Previously Received (Reimbursed by ADEQ):		\$260,951.77			
E. Amount of this Request (same as line 7 above unless it is the 1st Request):		\$4,388.00			

Interim Request No.	9	Page	4	of	16
Consultant /Responsible Party: Environmental Pollution Consultants/Eubanks Oil Company, Inc.					
Facility Identification # 28000045		Facility Name: Marmaduke Chevron			
Dates costs incurred: From 11/30/22 to 03/11/24		Request date: 03/11/24			

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
PRINCIPAL/MANAGERIAL:						
						\$0.00
04/30/23	Marm-012	David Diehl	Pm,Rev,PropMap	1.00	✓ \$54.00	\$54.00
06/30/23	Marm-012	David Diehl	PM, Disc, bids, etc	1.00	✓ \$54.00	\$54.00
						\$0.00
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						\$0.00
ADDITIONAL PRINC/MGR COSTS (from the Extra Direct Labor Page):						
TOTAL PRINCIPAL/MANAGERIAL:				2.00		\$108.00

Interim Request No.	9	Page	5	of	16
Consultant /Responsible Party: Environmental Pollution Consultants/Eubanks Oil Company, Inc.					
Facility Identification # 28000045			Facility Name: Marmaduke Chevron		
Dates costs incurred: From 11/30/22 to 03/11/24 Request date: 03/11/24					

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
PROFESSIONAL/TECHNICAL:						
08/01/23	Marm-012	David Diehl	ASAWP-4	1.50 /	\$54.00	\$81.00
08/02/23	Marm-012	David Diehl	ASAWP-4	3.00 /	\$54.00	\$162.00
08/03/23	Marm-012	David Diehl	ASAWP-4	3.50 /	\$54.00	\$189.00
08/08/23	Marm-012	David Diehl	ASAWP-4	2.00 /	\$54.00	\$108.00
08/12/23	Marm-012	David Diehl	ASAWP-4	3.00 /	\$54.00	\$162.00
08/13/23	Marm-012	David Diehl	ASAWP-4	2.00 /	\$54.00	\$108.00
09/05/23	Marm-012	David Diehl	ASAWP-4	3.00 /	\$54.00	\$162.00
09/12/23	Marm-012	David Diehl	ASAWP-4	3.00 /	\$54.00	\$162.00
09/13/23	Marm-012	David Diehl	ASAWP-4	1.00 /	\$54.00	\$54.00
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ADDITIONAL PROF/TECH COSTS (from the Extra Direct Labor Page):						
TOTAL PROFESSIONAL/TECHNICAL COSTS:				22.00		\$1,188.00

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
SUPPORT:						
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
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						\$0.00

ADDITIONAL SUPPORT COSTS (from the Extra Direct Labor Page):						
TOTAL SUPPORT COSTS:				0.00		\$0.00
TOTAL DIRECT LABOR COSTS:				24.00		\$1,296.00

Consultant /Responsible Party: Environmental Pollution Consultants/Eubanks Oil Company, Inc.

Facility Identification # 28000045 Facility Name: Marmaduke Chevron

Dates costs incurred: From 11/30/22 to 03/11/24 Request date: 03/11/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	VENDOR AND WORK PLAN TASK	UNITS	RATE	AMOUNT
EQUIPMENT RENTAL					
					\$0.00
					\$0.00
					\$0.00
					\$0.00
					\$0.00
					\$0.00
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					\$0.00
					\$0.00
					\$0.00

ADDITIONAL EQUIPMENT RENTAL (from the Extra Fixed Rate Costs page):

TOTAL EQUIPMENT RENTAL: \$0.00

Interim Request No.	9	Page	8	of	16
Consultant /Responsible Party:	Environmental Pollution Consultants/Eubanks Oil Company, Inc.				
Facility Identification #	28000045	Facility Name:	Marmaduke Chevron		
Dates costs incurred:	From	11/30/22	to	03/11/24	Request date: 03/11/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	TRAVELER AND WORK PLAN TASK	# OF NIGHTS	RATE	AMOUNT
MEAL PER DIEM:					
					\$0.00
					\$0.00
					\$0.00
					\$0.00
					\$0.00
					\$0.00
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					\$0.00
					\$0.00
					\$0.00
ADDITIONAL MEAL PER DIEM COSTS (from the Extra Fixed Rate Costs page):					
TOTAL MEAL PER DIEM COSTS:					\$0.00

Interim Request No.	9	Page 9 of 16			
Consultant /Responsible Party:	Environmental Pollution Consultants/Eubanks Oil Company, Inc.				
Facility Identification #	28000045	Facility Name: Marmaduke Chevron			
Dates costs incurred:	From	11/30/22	to	03/11/24	Request date: 03/11/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	ROUTE AND WORK PLAN TASK	# OF MILES	RATE	AMOUNT
MILEAGE:					
					\$0.00
					\$0.00
					\$0.00
					\$0.00
					\$0.00
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					\$0.00
ADDITIONAL MILEAGE COSTS (from the Extra Fixed Rate Costs page):					\$0.00
TOTAL MILEAGE COSTS:					\$0.00

Revised 01/2016

Interim Request No. 9 Page 12 of 16

Consultant /Responsible Party: Environmental Pollution Consultants/Eubanks Oil Company, Inc.

Facility Identification # 28000045 Facility Name: Marmaduke Chevron

Dates costs incurred: From 11/30/22 to 03/11/24 Request date: 03/11/24

OTHER DIRECT COSTS DETAIL

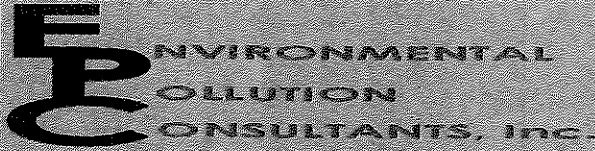
DATE INVOICE# DESCRIPTION AND WORK PLAN TASK AMOUNT

LABORATORY:

Table with 4 columns: DATE, INVOICE#, DESCRIPTION AND WORK PLAN TASK, AMOUNT. Multiple empty rows for data entry.

ADDITIONAL LABORATORY COSTS (from the Extra Other Direct Costs page): \$0.00

TOTAL LABORATORY COSTS: \$0.00



INVOICE

Invoice No: Marm-012

Invoice Date: March 11, 2024

Proj. Management -
Additional Site Assessment Work Plan - 4
Reimbursement - 009

Customer Information:

Laurie Eubanks
3607 Fieldstone Dr.
Paragould, Arkansas 72450

Job Location:

Marmaduke Chevron
300 South 3rd Street
Marmaduke, Arkansas 72443
Facility ID# 28000045; LUST Case# 28-0029

Date	Description	Units	Rate	Total
Project Management - (EPC Labor - D. Diehl)				
4/30/23	PM - Discussions, review, proposed boring map to ADEE	1.00	\$ 162.00	162.00
6/30/2023 --	PM - Discussions, bid requests, etc.	1.00	\$ 162.00	162.00
			Labor Subtotal \$	324.00
Additional Site Assessment Work Plan - 4 (EPC Labor - D. Diehl)				
8/1/23	ASAWP-4	1.50	\$ 162.00 \$	243.00
8/2/23	ASAWP-4	3.00	\$ 162.00 \$	486.00
8/3/23	ASAWP-4	3.50	\$ 162.00 \$	567.00
8/8/23	ASAWP-4	2.00	\$ 162.00 \$	324.00
8/12/23	ASAWP-4	3.00	\$ 162.00 \$	486.00
8/13/23	ASAWP-4	2.00	\$ 162.00 \$	324.00
9/5/23	ASAWP-4	3.00	\$ 162.00 \$	486.00
9/12/23	ASAWP-4	3.00	\$ 162.00 \$	486.00
9/13/23	ASAWP-4	1.00	\$ 162.00 \$	162.00
			Labor Subtotal \$	3,564.00
3/11/24	Reimbursement - 009	1.00	\$ 500.00 \$	500.00

Page Total \$ 4,388.00



ARKANSAS

ENERGY & ENVIRONMENT

MEMORANDUM

Matthew McGhee 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 #9
For Time Period: November 30, 2022 to March 11, 2024
Amount Requested: \$4,388.00
[former] Marmaduke Chevron (Eubanks Oil Co., Inc.)
300 South 3rd St.
Marmaduke, 72443
ID #28000045 LUST #28-0029 AFIN: 28-00346

The following is in response to your memo to me dated March 29, 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.*

The *Exposure Assessment*, completed March 1, 2021, recommended the removal of free product to the maximum extent practicable. The *Free Product Removal Work Plan*, approved on November 15, 2021, authorized up to five (5) 24-hour MDPE events.

The project has been delayed due to discovery of additional free product and a change in hydrogeological conditions.

- 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.*

Five (5) 24-hour MDPE events have thus far removed approximately 343 gallons of vapor equivalent product and approximately 22,157 gallons of water.

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 of a 4th *Additional Site Assessment Work Plan and Cost Estimate* approved on April 9, 2024.
- The Preparation of Reimbursement Application #9

- 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

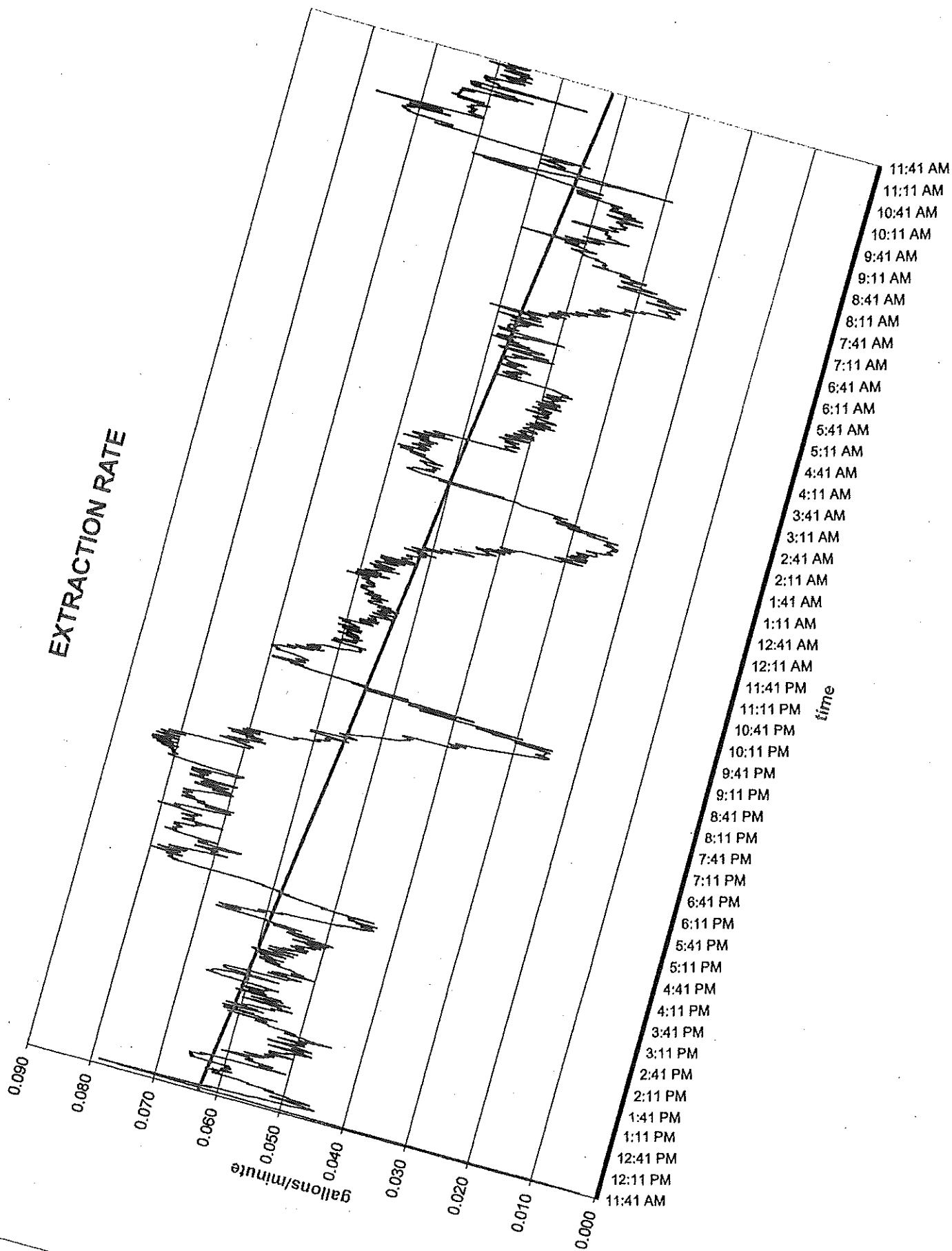
- a) *If not provided by the consultant in the application, please attach site maps that identify the location of the site and the area of the release within the site.*

The consultant has provided potentiometric surface maps.

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

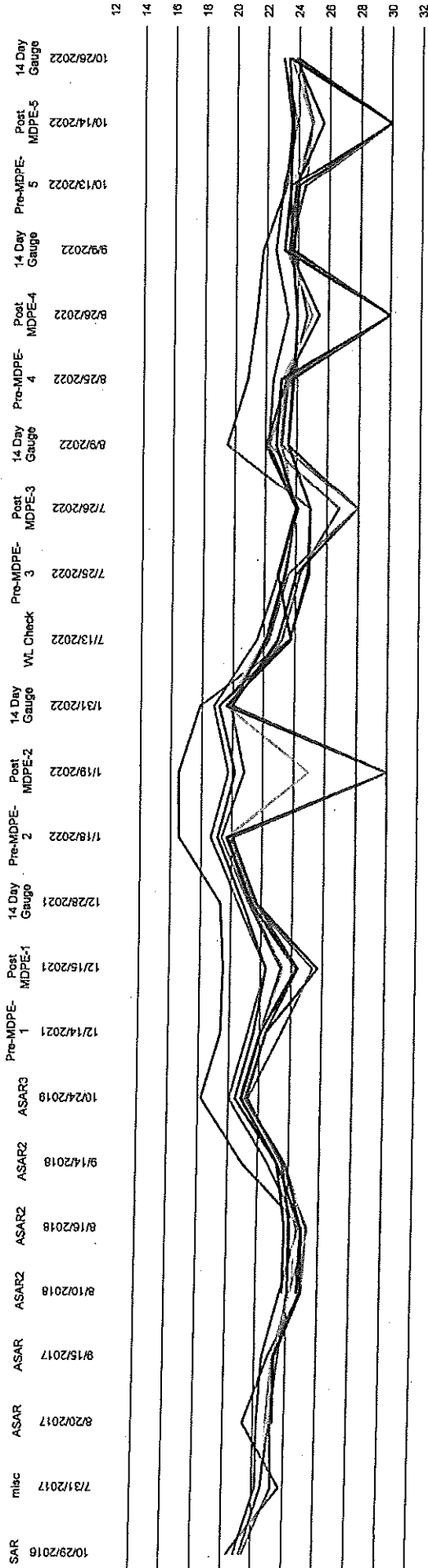
Please see a chart from the *Free Product Removal Report – MDPE #5* that illustrates historic groundwater levels, measured in feet below ground surface as of October 26, 2022. Please also see a table, from the same report, which measures the persistence of free product despite four aggressive MDPE events.

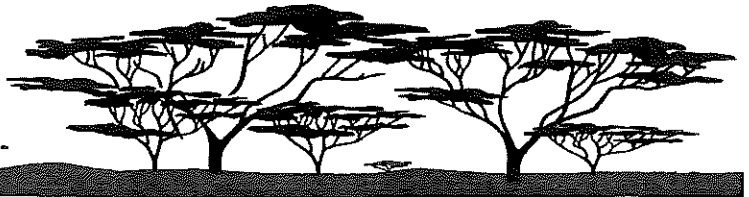
EXTRACTION RATE



Marmaduke Chevron
 300 South 3rd St., Marmaduke, Arkansas 72443
 Facility I D # 28000046 - LUST Case # 28-0029 - AFIN # 28-00346

Depth to Groundwater - 9/25/16 thru 10/26/22





March 11, 2024

RECEIVED
MAR 29 2024
DEQ - RST

Trotta

Ms. Laurie Eubanks
3607 Fieldstone Dr.
Paragould, Arkansas 72450

RE: Reimbursement Application - 009
Former Marmaduke Chevron, 300 South 3rd Street, Marmaduke, Arkansas 72443
Facility ID # 28000045, LUST Case # 28-0029, AFIN# 28-00346

Dear Ms Eubanks:

Enclosed is the 9th Reimbursement Application for the Marmaduke Chevron facility. The Total Reimbursement is for \$4,388.00. Please enclose a check for Invoice# Marm-012 in the amount of \$4,388.00 with the Certification Page Of Reimbursement Application. I need the check to satisfy the legal requirements set forth by ADEQ concerning payment obligations. Please sign and notarized the Certification Page and mail it back to me, along with the check, as soon as possible. Once I have received the signed application and the check, I will promptly sign the affidavit page and submit the application to ADEQ.

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

Sincerely,

David L. Diehl, P.G.
President/Environmental Pollution Consultants, Inc.

c: File - Marmaduke

PROJECT SUMMARY
former Marmaduke Chevron
Facility ID# 28000045: LUST Case# 28-0029

November 30, 2022 through March 11, 2024

Activities conducted during the above referenced dates are for:

- Project Management and scope
- Preparation of 4th Additional Site Assessment Work Plan
- Reimbursement Application - 009

- Preparation of 4th Additional Site Assessment Work Plan (ASAWP-4).

The Office of Land Resources, Petroleum Tanks Program (PTP) requested the preparation of a fourth additional site assessment work plan (ASAWP-4) & cost estimate. The additional assessment was to further define the extent of petroleum contamination identified at the property known as the former Marmaduke Chevron in Marmaduke, Arkansas.

On March 10, 2023, proposed additional assessment activities (sb/MW Placement) were submitted to ADEE in preparation of a scoping meeting. The case manager was out on extended leave. After a brief phone conversation with the case manager (Mr. Joshua Stevens) via telephone in late June, 2023, the additional assessment work plan was prepared as proposed.

Specifically discussed, investigate to the north beneath Main Street and other areas deemed necessary to define the extent of contamination. A total of seven (7) soil boring/Monitoring Wells (sb/MW) were proposed at this time. To avoid safety concerns associated with installing sb/MW's along the centerline of busy roadways, 45° angled borings were proposed. Three (3) sb/MW's were to be angled at 45° to extend northward underneath Main Street and two (2) sb/MW's will be angled at 45° to extend westward underneath Highway 49. The other two (2) sb/MW's would be vertical to fill in data gaps east of the facility building. The final issue discussed was the need for interim free product removal (IFPR) from monitoring wells which have exhibited free product and/or wells which have the potential to generate free product. In a later conversation with ADEE the use of Mobile Dual Phase Extraction (MDPE) technology to remove any product encountered was discussed. It was determined, maybe not the most cost effective method, therefore, MDPE's were not proposed in the work plan.

Release History
former Marmaduke Chevron
Facility ID# 28000045: LUST Case# 28-0029

Release History in part taken from the ADEQ 4/6/16 Preliminary Assessment and the ADEQ on-line database.

- November 9, 2015: A voluntary closure of the underground storage tank (UST) system at the former Marmaduke Chevron was conducted by personnel from the Lonny Goodwin Co. The former system consisted of three (3) USTs and the associated product piping which fed three (3) fuel dispensers. Following permanent removal of the underground storage tank system, soil samples were collected and submitted for chemical analysis.
- December 1, 2015: The ADEQ received the Contractor's UST Permanent Closure Report from Lonny Goodwin Co. including soil sampling data. Sample results were indicative of a hydrocarbon release with the highest TPH-GRO concentration reported at 2,570 mg/kg in subsurface soils located in the product piping trench. Inspector Wes Klasky initiated LUST # 28-0029 as a confirmed release. Klasky then referred LUST # 28-0029 to Inspector Supervisor Robert Morgan for further review.
- December 8, 2015: Inspector Supervisor Robert Morgan referred LUST # 28-0029 to the Technical Branch staff, and the LUST file was assigned to case manager Jarrod Zweifel.
- December 16, 2015: Site visit and receptor survey was completed by Zweifel.
- February 4, 2016: Personnel from Lonny Goodwin Co. voluntarily re-sampled subsurface soils related to the UST closure.
- February 16, 2016: Inspector Supervisor Robert Morgan contacted personnel from Lonny Goodwin Co to inform them the UST closure was not completed according to ADEQ published guidelines. Mr. Goodwin was instructed to excavate, transport, dispose and manifest previously reported contaminated soils as outlined in ADEQ Guidelines for the Permanent Closure of Underground Storage Tank Systems.
- March 28, 2016: Subsequent soil sampling data was received from Lonny Goodwin Co. with contaminant concentrations exceeding those previously reported.
- April 8, 2016: The letter request for a Site Assessment Work Plan and Cost Estimate was mailed from the ADEQ.
- May 25, 2017: The Site Assessment Work Plan and Cost Estimate was submitted to the ADEQ.
- July 11, 2016: The SAWP was approved by the ADEQ.
- December 27, 2017: The SAR from EPC, Inc. was received by the ADEQ.
- February 10, 2017: An Additional Site Assessment (ASA) Work Plan and Cost Estimate was requested by the ADEQ.

Release History
former Marmaduke Chevron
Facility ID# 28000045: LUST Case# 28-0029

- May 16, 2017: The ASA work plan and cost estimate was submitted to ADEQ.
- May 24, 2017: ADEQ requested clarifications to VP locations & bid estimates in the ASA work plan.
- June 5, 2017: The ASA work plan and cost estimate was submitted to ADEQ.
- June 13, 2017: The ASA work plan was approved by ADEQ.
- August 8, 2017: The ASA was implemented.
- October 4, 2017: The ASA Report was submitted to ADEQ.
- December 22, 2018: The ADEQ requested a 2nd ASAWP (ASAWP-2) to primarily define the extent of free product identified in Monitoring Well MW-4.
- January 19, 2018: The ADEQ requested that the preparation of the ASAWP-2 be suspended, due to excavation work being requested by the inspector division interfering with the current work plan and investigation. In order to prevent a vertical migration pathway, two monitoring wells needed to be plugged prior to the excavation activities. ADEQ also requested a change order to decommission the two monitoring wells.
- January 26, 2018: The Change Order to Decommission two monitoring wells was submitted.
- January 29, 2018: ADEQ approves the Change Order to Decommission two monitoring wells.
- February 5, 2018: Monitoring wells MW-4 & MW-5 were decommissioned.
- February 7, 2018: The monitoring well decommissioning report was submitted.
- March 30, 2018: ADEQ request the preparation of the ASAWP-2 be resumed.
- May 31, 2018: The ASAWP-2 was submitted.
- June 15, 2018: The ASAWP-2 was approved.
- August 1, 2018: The 2nd ASA was implemented.
- August 7, 2018: A Change Order was submitted to utilize a different drilling contractor for under the canopy wells. It was approved on August 8, 2018. The wells were installed on August 17, 2018 and sampled on September 14, 2018.
- November 13, 2018: The 2nd ASA Report was submitted.
- July 1, 2019: ADEQ requested 3rd Additional Site Assessment Work Plan (ASAWP-3).
- September 27, 2019: The ASAWP-3 was approved.
- October 23, 2019: The 3rd ASA was implemented.
- November 21, 2019: The 3rd ASA Report was submitted.
- March 16, 2021: ADEE requested a Free Product Removal Work Plan (FPRWP).
- May 14, 2021: A proposal of an initial proposal of an (8hr) mobile dual phase extraction (MDPE) event was submitted to establish baseline data for free product removal and any future product removal activities.

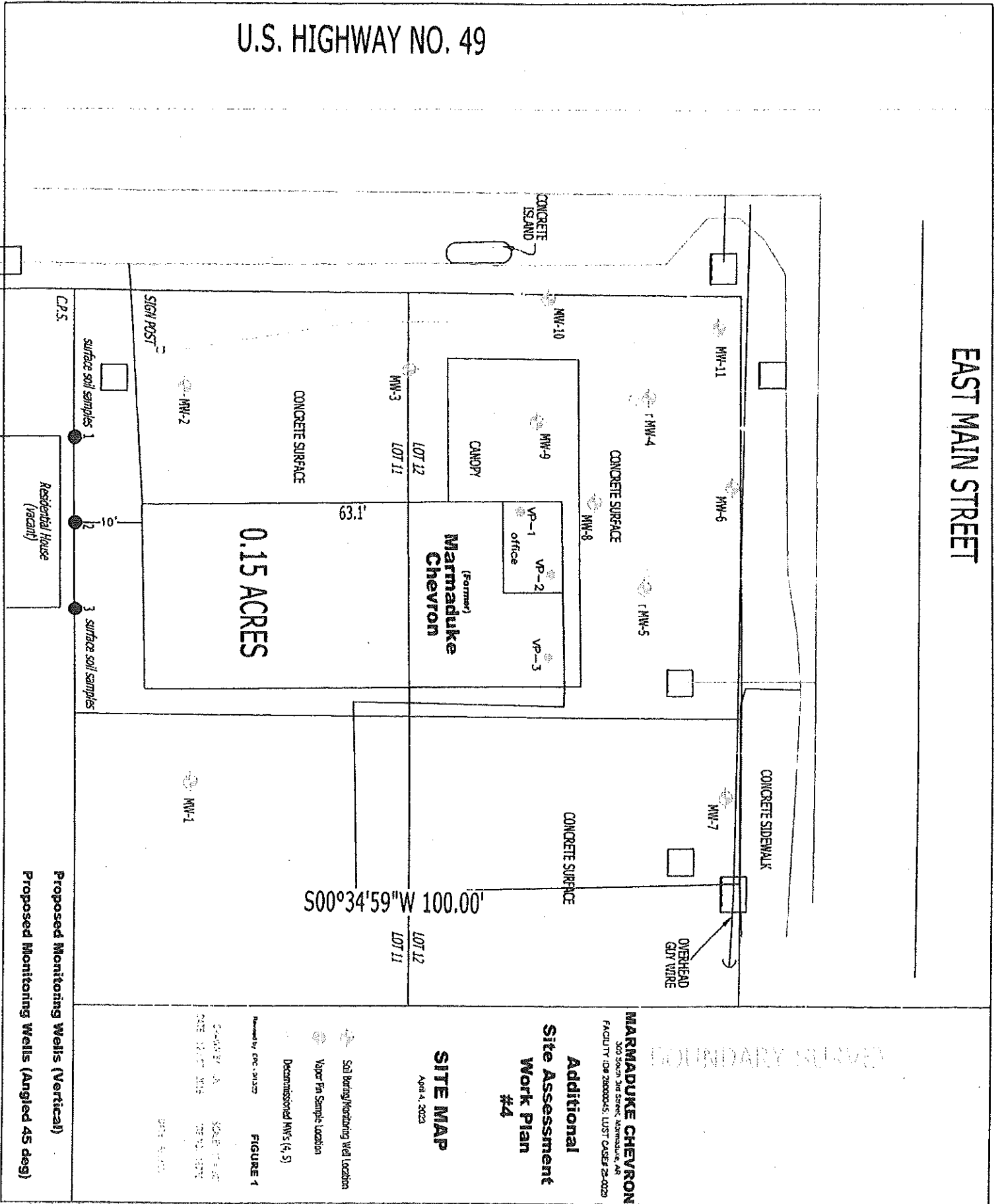
Release History
former Marmaduke Chevron
Facility ID# 28000045: LUST Case# 28-0029

- June 8, 2021: ADEE, responded, via e-mail correspondence, with specific MDPE criteria for the free product removal activities.
- September 10, 2021: The FPRWP was submitted.
- September 27, 2021: ADEE requested revisions to the work plan.
- October 15, 2021: The revised FPRWP was submitted.
- November 15, 2021: The revised FPRWP was Approved.
- December 14, 2021: The first 24 hr MDPE event was conducted. (MDPE-1 recovered 143.5 VEG of product).
- December 28, 2021: The post MDPE-1 gauging event was conducted.
- January 6, 2021: The Free Product Removal Report for 24hr MDPE-1 was submitted.
- January 18, 2022: The second 24 hr MDPE event was conducted. (MDPE-2 recovered 56.9 VEG of product).
- January 31, 2022: The post MDPE-2 gauging event was conducted.
- February 15, 2022: The Free Product Removal Report for 24hr MDPE-2 was submitted
- March 11, 2022: ADEE agreed with conducting an additional MDPE event, however, requested that it be conducted in the early summer months when water level conditions are more favorable for recovery efforts. Proposed months were late July early August, 2022.
- July 13, 2022: A groundwater level check was conducted, after discussions with the ADEE case manager, to determine if the conditions were suitable for the 3rd MDPE.
- July 14, 2022: A groundwater level check report was submitted to ADEE.
- July 15, 2022: ADEE approved resuming the FPRWP and the 3rd 24 hr MDPE event was scheduled.
- July 25, 2022: The 3rd 24 hr MDPE event was conducted. (MDPE-3 recovered 37.8 VEG of product).
- August 8, 2022: The Free Product Removal Report for 24hr MDPE-3 was submitted via email.
- August 9, 2022: The post MDPE-3 gauging event was conducted.
- August 15, 2022: The post MDPE-3 gauging event Report and The Free Product Removal Report for 24hr MDPE-3 were submitted.
- August 18, 2022: ADEE approves conducting MDPE-4.
- August 25, 2022: The 4th 24 hr MDPE event was conducted. (MDPE-4 recovered 37.5 VEG of product).
- September 9, 2022: The post MDPE-3 gauging event was conducted.
- September 16, 2022: The Free Product Removal Report for 24hr MDPE-4 was submitted.
- October 7, 2022: ADEE approves conducting MDPE-5.
- October 13, 2022: The 5th 24 hr MDPE event was conducted. (MDPE-5 recovered 73.1 VEG of product).
- October 26, 2022: The post MDPE-5 gauging event was conducted.
- November 17, 2022: The Free Product Removal Report for 24hr MDPE-5 was submitted.

- February 14, 2023: ADEQ requested 4th Additional Site Assessment Work Plan (ASAWP-4).
- March 10, 2023: Proposed additional assessment activities (sb/MW Placement) were submitted to ADEE in preparation of a scoping meeting. The case manager was out on extended leave. After a brief phone conversation with the case manager (Mr. Joshua Stevens) via telephone in late June, 2023, the additional assessment work plan was prepared as proposed.
- September 6, 2023: The ASAWP-4 was submitted.

U.S. HIGHWAY NO. 49

EAST MAIN STREET



BOUNDARY SURVEY

MARMADUKE CHEVRON
300 South 3rd Street, Marmaduke, AR
FACILITY ID# 2800005; LUST CASE# 72-0029

Additional Site Assessment Work Plan #4

SITE MAP

April 4, 2023

- Soil Boring/Monitoring Well Location
- Vapor Probe Sample Location
- Decommissioned MW's (4, 5)

Prepared by: GTC-31027 **FIGURE 1**

Checked by: GTC-31027 DATE: 04/07/2023 DATE: 04/07/2023

DATE: 4/10/23

Proposed Monitoring Wells (Vertical)
Proposed Monitoring Wells (Angled 45 deg)



**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: June 26, 2024

Subject: **Panky 66 Station
716 Highway 367 North
Newport, AR 72501
ID #34000017 LUST #34-0019 AFIN 34-00306**

A request for reimbursement (#3) for costs incurred during remediation of an Underground Storage Tank (UST) site was received from the Responsible Party (RP) on March 29, 2024. The RP of this site reported a product release (#34-0019) on April 26, 2017, after receiving analytical results from a tank removal indicating presence of petroleum. The name and the address of the RP:

**White River Petroleum Company, Inc.
Attn: Jerry Townsley
P.O. Box 2464
Batesville, AR 72503**

The period covered by this application is January 13, 2022 through January 11, 2024. Remediation activities for which reimbursement is requested include: planning and partial implementation of a 2nd Additional Site Assessment with Interim Free Product Removal Work Plan and Cost Estimate and preparation of Reimbursement Application #3.

To date, only Investigative Derived Waste (IDW) has been removed from the site.

This application includes one (1) invoice from Environmental Pollution Consultants, Inc. (EPC) totaling **\$38,085.96**. Included in EPC's invoices are charges from: AIMRIGHT Drilling (\$16,470.00) and Arkansas Analytical (\$1,015.00).

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

RECOMMENDATION:

The claimed cost of **\$38,085.96** was checked against documentation provided. **The following adjustments are recommended: \$4.44 for safe and warranty charges on lodging receipt and \$500.00 to reduce the application preparation charge to allowable amount. Total adjusted amount is \$504.44.** 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	\$ 38,085.96
Less: Deductible	- 00.00
Less: Adjustments	- <u>504.44</u>
Total Net Claim	<u>\$ 37,581.52</u>

It is recommended that the claim made by the RP be considered in the amount of **\$37,581.52**.

34000017-03 LUST #34-0019 BG, JT

Approved Work Plans

34000017 34-0019 PANKY 66 STATION

	<u>Date</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	01/22/2018	Site Assessment WP	EPC	\$30,764.00
02	01/03/2020	Additional Site Assessment WP & CE	EPC	\$43,085.10
03	03/09/2020	Approval of CO 1 Add'l SAWP	EPC	\$360.00
04	06/01/2020	Approval of Change Order 2 Add'l SAWP	EPC	\$9,256.38
05	10/16/2023	Approva; of 2nd Add'l SA with IFPRWP & C.E.	EPC	\$94,940.96
				<hr/>
				\$178,406.44
				<hr/>

Approved Payments

34000017

340019

PANKY 66 STATION

Date Approved

Amount

3 /27/2019

\$19,772.19

2 /24/2021

\$48,054.59

\$67,826.78

RECEIVED

APR 2 2024

DEQ - RST

Cover Page

Page 1 of 16

APPLICATION FOR REIMBURSEMENT
from the
PETROLEUM STORAGE TANK TRUST FUND

RECEIVED

MAR 29 2024

DEQ - RST

(1) ADEQ Facility Identification Number: 34000017

34-00306 *Ajin*

(2) Responsible Party Information:

Company Name White River Petroleum Company, Inc.

Contact Person Jerry Townsley

Address P.O. Box 2464

City and State Batesville, Arkansas

Zip Code 72503

Phone 870-793-2213

(3) Release Location

Facility Name Panky 66 Station

Address 716 Highway 367 North

City and State Newport, Arkansas, 72501

(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 4/26/2017 Release (LUST) Number 34-0019

Facility ID# 34000017
Date 03/08/24

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

White River Petroleum Company, Inc.

Jerry Townsley

Type/Print name of Owner/Operator or Responsible Party

Jerry Townsley

Signature of Owner/Operator or Responsible Party

ACKNOWLEDGEMENT

Sworn to and subscribed before me this 29th day of March, 2024.

Thomas C Showalter
Notary Public

My Commission Expires: 01/04/2026


THOMAS C SHOWALTER
NOTARY PUBLIC - ARKANSAS
INDEPENDENCE COUNTY
My Commission Expires 01-04-2026
Commission No. 12696712

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 White River Petroleum for the invoices contained in this reimbursement request:


Invoice Number	Invoice Date	Invoice Amount
P-66-003	2/26/2024	\$38,085.96
Total		\$38,085.96

Signed this 26th day of MARCH, 2024

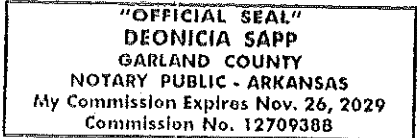

David L. Diehl, President

ACKNOWLEDGEMENT

Sworn to and subscribed before me this 26th day of March, 2024.


Deoncia Sapp
Notary Public

My Commission Expires: 11.26.2029



Interim Request No.	3	COST SUMMARY SHEET				
Consultant /Responsible Party: EPC, Inc./White River Petroleum Company, Inc.						
Facility Identification #: 34000017		Facility Name: Paky 66 Station				
Dates current costs incurred:	From	01/13/22	to	01/11/24	Request Date: 03/08/24	
COST SUMMARY						
1. DIRECT LABOR COST (attach labor recap)		Hours	Actual Cost			
Principal/Managerial		0.00	\$0.00			
Professional/Technical		88.75	\$4,792.50			
Support		0.00	\$0.00			
Totals		88.75	\$4,792.50			
Total Actual Labor Costs x 3					\$14,377.50	
2. FIXED RATE COSTS (List by category - attach recap)				Actual Cost		
Equipment Rental				\$305.00		
Per Diem (meals only, with documented overnight stay)				\$100.00		
Mileage				\$699.30		
Other				\$0.00		
Total Fixed Rate Costs					\$1,104.30	
3. OTHER DIRECT COSTS (List by category - attach recap)				Actual Cost		
Lodging				\$276.02		
Laboratory				\$1,015.00		
Subcontracts				\$16,712.45		
Supplies				\$0.00		
Other				\$0.00		
Total Other Direct Costs					\$18,003.47	
4. Reimbursement Preparation Cost for RA#(s)		3	(\$500 or \$1000)		\$1,000.00	
5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)					\$34,485.27	
6. Markup on Total Other Direct Costs (maximum 20%)					\$3,600.69	
7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)					\$38,085.96	
A. Total Reimbursement Requested to Date Including Above:					\$113,412.74	
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):					\$67,826.78	
E. Amount of this Request (same as line 7 above unless it is the 1st Request):					\$38,085.96	

Consultant /Responsible Party: EPC, Inc./White River Petroleum Company, Inc.

Facility Identification # 34000017 Facility Name: Paky 66 Station

Dates costs incurred: From 01/13/22 to 01/11/24 Request date: 03/08/24

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
PROFESSIONAL/TECHNICAL:						
01/13/22	P-66-003	D. Diehl	T1 - ASAWP-2	5.50	\$54.00	\$297.00
01/14/22	P-66-003	D. Diehl	T1 - ASAWP-2	2.25	\$54.00	\$121.50
01/27/22	P-66-003	D. Diehl	T1 - ASAWP-2	2.50	\$54.00	\$135.00
01/28/22	P-66-003	D. Diehl	T1 - ASAWP-2	4.00	\$54.00	\$216.00
02/16/22	P-66-003	D. Diehl	T1 - ASAWP-2	1.50	\$54.00	\$81.00
03/21/22	P-66-003	D. Diehl	T1 - ASAWP-2	1.50	\$54.00	\$81.00
03/22/22	P-66-003	D. Diehl	T1 - ASAWP-2	4.00	\$54.00	\$216.00
03/23/22	P-66-003	D. Diehl	T1 - ASAWP-2	2.00	\$54.00	\$108.00
03/24/22	P-66-003	D. Diehl	T1 - ASAWP-2	2.00	\$54.00	\$108.00
10/21/22	P-66-003	D. Diehl	T1 - ASAWP-2	2.50	\$54.00	\$135.00
12/08/22	P-66-003	D. Diehl	T1 - ASAWP-2	1.50	\$54.00	\$81.00
12/09/22	P-66-003	D. Diehl	T1 - ASAWP-2	3.00	\$54.00	\$162.00
03/08/23	P-66-003	D. Diehl	T1 - ASAWP-2	2.00	\$54.00	\$108.00
10/02/23	P-66-003	D. Diehl	T1 - ASAWP-2	0.50	\$54.00	\$27.00
11/14/23	P-66-003	D. Diehl	T2 - Site Mark - Drillin	7.00	\$54.00	\$378.00
12/19/23	P-66-003	D. Diehl	T2 - Subsurface Invest	12.50	\$54.00	\$675.00
12/20/23	P-66-003	D. Diehl	T2 - Subsurface Invest	10.50	\$54.00	\$567.00
12/21/23	P-66-003	D. Diehl	T2 - Subsurface Invest	11.00	\$54.00	\$594.00
12/26/23	P-66-003	D. Diehl	T-2 - QA/QC del smpls	2.25	\$54.00	\$121.50
01/11/24	P-66-003	D. Diehl	T-2 - Devel, wells	10.75	\$54.00	\$580.50
						\$0.00
						\$0.00
						\$0.00
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						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
ADDITIONAL PROF/TECH COSTS (from the Extra Direct Labor Page):						
TOTAL PROFESSIONAL/TECHNICAL COSTS:				88.75		\$4,792.50

Revised 01/2016

Interim Request No.	3	Page 6 of 16		
Consultant /Responsible Party: EPC, Inc./White River Petroleum Company, Inc.				
Facility Identification # 34000017		Facility Name: Paky 66 Station		
Dates costs incurred: From 01/13/22		to 01/11/24		Request date: 03/08/24

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
SUPPORT:						
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
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						\$0.00
ADDITIONAL SUPPORT COSTS (from the Extra Direct Labor Page):						
TOTAL SUPPORT COSTS:				0.00		\$0.00
TOTAL DIRECT LABOR COSTS:				88.75		\$4,792.50

Consultant /Responsible Party: EPC, Inc./White River Petroleum Company, Inc.

Facility Identification # 34000017 Facility Name: Paky 66 Station

Dates costs incurred: From 01/13/22 to 01/11/24 Request date: 03/08/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	VENDOR AND WORK PLAN TASK	UNITS	RATE	AMOUNT
EQUIPMENT RENTAL					
12/19/23	P-66-003	T-2 EPC - PID - Mini Rae 3000	1	\$75.00	\$75.00
12/20/23	P-66-003	T-2 EPC - PID - Mini Rae 3000	1	\$75.00	\$75.00
12/21/23	P-66-003	T-2 EPC - PID - Mini Rae 3000	1	\$75.00	\$75.00
01/11/24	P-66-003	T-2 EPC - Monsoon pump & VF controler - smpl	1	\$80.00	\$80.00
					\$0.00
					\$0.00
					\$0.00
					\$0.00
					\$0.00
					\$0.00
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					\$0.00
					\$0.00
ADDITIONAL EQUIPMENT RENTAL (from the Extra Fixed Rate Costs page):					
TOTAL EQUIPMENT RENTAL:					\$305.00

Revised 01/2016

Interim Request No.	3	Page 8 of 16
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Consultant /Responsible Party: EPC, Inc./White River Petroleum Company, Inc.

Facility Identification # 34000017 Facility Name: Paky 66 Station

Dates costs incurred: From 01/13/22 to 01/11/24 Request date: 03/08/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	TRAVELER AND WORK PLAN TASK	# OF NIGHTS	RATE	AMOUNT
MEAL PER DIEM:					
12/19 --	P-66-003	D. Diehl - 2 - T2	2	\$50.00	\$100.00
12/21/23					\$0.00
					\$0.00
					\$0.00
					\$0.00
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					\$0.00

ADDITIONAL MEAL PER DIEM COSTS (from the Extra Fixed Rate Costs page):	
TOTAL MEAL PER DIEM COSTS:	\$100.00

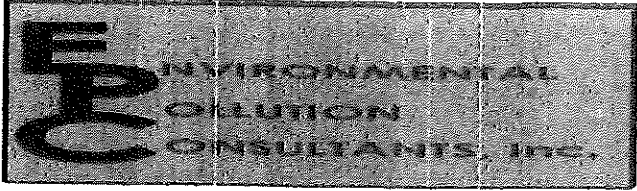
Consultant /Responsible Party: EPC, Inc./White River Petroleum Company, Inc.

Facility Identification # 34000017 Facility Name: Paky 66 Station

Dates costs incurred: From **01/13/22** to **01/11/24** Request date: **03/08/24**

OTHER DIRECT COSTS DETAIL

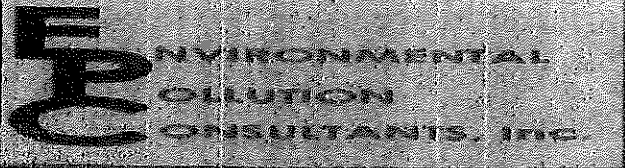
DATE	INVOICE#	TRAVELER'S NAME, # OF NIGHTS AND WORK PLAN TASK	AMOUNT
LODGING:			
12/19 -- 12/21/23	P-66-003	T-2 - D.Diehl - 2 - Cobblestone Inn & Suites - Acct 39636021	\$276.02
ADDITIONAL LODGING COSTS (from the Extra Other Direct Costs page):			\$0.00
TOTAL LODGING COSTS:			\$276.02



INVOICE

Invoice No: P-66-003	Invoice Date: February 26, 2024
PM - ASAWP-2 - Field Investigation (Phase - 1) Soil Investigation & Monitoring & Vapor Well Installation Reimbursement Application-003	
Customer Information: White River Petroleum Company, Inc. P.O. Box 2464 Batesville, Arkansas 72503-2464	Job Location: Panky 66 Station 716 Highway 367 North Newport, Arkansas 72501 Facility ID# 34000017; LUST Case# 34-0019; AFIN# 34-00306

Date	Description	Units	Rate	Total
Task - 1 Work Plan Preparation (EPC Labor - David Diehl)				
01/13/22	2nd ASA Work Plan prep	5.50	\$ 162.00	\$ 891.00
01/14/22	2nd ASA Work Plan prep	2.25	\$ 162.00	\$ 364.50
01/27/22	2nd ASA Work Plan prep	2.50	\$ 162.00	\$ 405.00
01/28/22	2nd ASA Work Plan prep	4.00	\$ 162.00	\$ 648.00
02/16/22	2nd ASA Work Plan prep	1.50	\$ 162.00	\$ 243.00
03/21/22	2nd ASA Work Plan prep	1.50	\$ 162.00	\$ 243.00
03/22/22	2nd ASA Work Plan prep	4.00	\$ 162.00	\$ 648.00
03/23/22	2nd ASA Work Plan prep	2.00	\$ 162.00	\$ 324.00
03/24/22	2nd ASA Work Plan prep	2.00	\$ 162.00	\$ 324.00
10/21/22	2nd ASA Work Plan prep revision	2.50	\$ 162.00	\$ 405.00
12/08/22	2nd ASA Work Plan prep revision	1.50	\$ 162.00	\$ 243.00
12/09/22	2nd ASA Work Plan prep revision	3.00	\$ 162.00	\$ 486.00
03/08/23	2nd ASA Work Plan CE revision	2.00	\$ 162.00	\$ 324.00
10/02/23	2nd ASA Work Plan 2nd CE revision	0.50	\$ 162.00	\$ 81.00
Labor Subtotal				\$ 5,629.50
Task - 2 Field Activities (EPC Labor - David Diehl)				
11/14/23	Site visit - Mark for Utility locate	7.00	\$ 162.00	\$ 1,134.00
12/19/23	Assessment - mobe/ drilling	12.50	\$ 162.00	\$ 2,025.00
12/20/23	Assessment - drilling	10.50	\$ 162.00	\$ 1,701.00
12/21/23	Assessment - drilling/demobe	11.00	\$ 162.00	\$ 1,782.00
12/26/23	Assessment - QA/QC - del soil samples to lab	2.25	\$ 162.00	\$ 364.50
01/11/24	Assessment - mobe/Acqr equip/Demobe/MW development	10.75	\$ 162.00	\$ 1,741.50
Labor Subtotal				\$ 8,748.00
Page Total				\$ 14,377.50



INVOICE

Invoice No: P-66-003
 PM - ASAWP-2 - Field Investigation (Phase - 1)
 Soil Investigation & Monitoring & Vapor Well Installation
 Reimbursement Application-003

Invoice Date: February 26, 2024

Customer Information:
 White River Petroleum Company, Inc.
 P.O. Box 2464
 Batesville, Arkansas 72603-2464

Job Location:
 Panky 68 Station
 716 Highway 367 North
 Newport, Arkansas 72501
 Facility ID# 34000017; LUST Case# 34-0010; AFIN# 34-00306

Date	Description	Units	Rate	Total
Equipment (Mileage)				
11/14/23	Site visit - Mark for Utility locate	290.00	\$ 0.70	\$ 203.00
12/19/23	Assessment - mobe/ drilling	150.00	\$ 0.70	\$ 105.00
12/20/23	Assessment - drilling	5.00	\$ 0.70	\$ 3.50
12/21/23	Assessment - drilling/demobe	150.00	\$ 0.70	\$ 105.00
12/26/23	Assessment - QA/QC - del soil samples to lab	100.00	\$ 0.70	\$ 70.00
01/11/24	Assessment - mobe/equip/MW devl/VP Inst/demobe	304.00	\$ 0.70	\$ 212.80
Mileage Subtotal				\$ 699.30
Equipment (EPC)				
12/19/23	PID - Mini Rae 3000 - T2 soil boring screening -	1.00	\$ 75.00	\$ 75.00
12/20/23	PID - Mini Rae 3000 - T2 soil boring screening	1.00	\$ 75.00	\$ 75.00
12/21/23	PID - Mini Rae 3000 - T2 soil boring screening	1.00	\$ 75.00	\$ 75.00
01/11/24	Monsoon pump & vf controler - T2 rtw develop	1.00	\$ 80.00	\$ 80.00
Equipment Subtotal				\$ 305.00
Thrd Party Vendors (Analytical)				
01/21/24	T-3 Arkansas Analytical - soil - Inv# K20APR207	1.00	\$ 1,218.00	\$ 1,218.00
Analytical Subtotal				\$ 1,218.00
Third Party Vendors				
12/27/23	T2 AIMRIGHT Drilling - SB/MW installation - Inv# 569	1.00	\$ 19,764.00	\$ 19,764.00
01/11/24	T2 United Rentals - VP Inst - Ham Drill - Inv# 229068427-001	1.00	\$ 175.70	\$ 175.70
01/11/24	T2 Sun Belt Rentals - VP Inst - Generator - Inv# 149213842-0001	1.00	\$ 115.24	\$ 115.24
12/19 - 21/24	T2 Cobblestone Hotel & Suites - Acct # 39636021	1.00	\$ 331.22	\$ 331.22
Vendors Subtotal				\$ 20,386.16
Other Direct Costs - Per Diem		2.00	50	\$ 100.00
Reimbursement Application - 003		1.00	1000	\$ 1,000.00
Page Total				\$ 23,708.46
Page Total				\$ 38,085.96



ARKANSAS

ENERGY & ENVIRONMENT

MEMORANDUM

Budget Green 4/19/24

To: Jacqueline Trotta, Trust Fund Administrator
Assessment & Remediation Program, Office of Land Resources

Through: Blake Whittle, P.G., Groundwater Branch Manager *BW 4/18/24*
A & R Program, OLR

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

Date: April 17, 2024

Subject: Technical Review of Reimbursement Application #3
For Time Period: January 13, 2022 to January 11, 2024
Amount Requested: \$38,085.96
Pankey 66 Station
716 Highway 367
Newport, Arkansas 72501
ID #34000017 AFIN 34-00306 LUST #34-0019

The following is in response to your memo to me dated April 2, 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 currently in Site Investigation phase of Subpart F. A 2nd Additional Site Assessment with Interim Free Product Removal Work Plan & Cost Estimate was approved on October 16, 2023. Work began in November 2023; a report was to be submitted on or before February 23, 2024.

- 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 goal of the aforementioned work plan is to remove free product to the maximum extent practicable as part of additional site assessment efforts, using a 12-hour Mobile Dual Phase Extraction pilot event.

- 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.*

To date, only Investigative Derived Waste (IDW) has been removed from the 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 #3 (RA #3) concerns activities related to:

- Planning and partial implementation of a 2nd Additional Site Assessment with Interim Free Product Removal Work Plan & Cost Estimate, approved on October 16, 2023.
- The preparation of RA #3

- 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.

RA #3 concerns partial implementation of the approved work plan, which is ongoing. In lieu of a formal report, the consultant has provided technical proof of the activities concerning RA #3.

- 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 a site map dated August 8, 2020.

- 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.

PROJECT SUMMARY

Panky 66 Station

716 Highway 367 North, Newport, Arkansas 72501
Facility ID # 34000017 - LUST Case # 34-0019 - AFIN # 34-00306

November 27, 2020 through January 11, 2024

Activities conducted during the above referenced dates are for:

- Project Management
- Additional Site Assessment Work Plan - 2
- Additional Site Assessment - 2 - Phase I - (Soil) - SB/MW installation, Development, VP Installation → Hand
- Reimbursement Application - 003

Release History in part taken from the ADEQ 10/19/17 Preliminary Assessment and the ADEQ on-line database.

March 27, 2017 - The underground storage tanks at the Panky 66 Station were removed. The ADEQ inspector (Jack Bissell) was on-site during the closure activities.

April 26, 2017 - A suspected release was reported upon the receipt of analytical results indicating the presence of petroleum constituents above ADEQ's action levels. LUST Case# 34-0019 was generated.

August 1, 2017 - LUST Case# 34-0019 was referred to the Technical Division (Ms. Dave Ann Pennington) for evaluation.

September 19, 2017 - ADEQ conducted a site reconnaissance to facilitate the preparation of a preliminary assessment.

October 19, 2017 - The Preliminary Assessment was completed. Based on the potential for free product in contact with groundwater, a site assessment should be undertaken. This assessment should be designed to determine the lateral and vertical extent of contamination in and around the area of the underground storage tank system, in accordance with 40 CFR § 280.65. A *Site Assessment Work Plan (SAWP) and Cost Estimate* should be prepared and submitted to the RST-RP staff for review and approval.

October 20, 2017 - ADEQ requested White River Petroleum, Inc., to prepare a SAWP.

December 7, 2017 - The SAWP was submitted to ADEQ.

January 22, 2018 - The SAWP was approved for implementation.

April 17, 2018 - The Site Assessment activities were implemented.

August 7, 2018 - The Site Assessment Report was submitted.

January 29, 2019 - ADEQ requested White River Petroleum, Inc., to prepare an Additional Site Assessment Work Plan (ASAWP).

February 12, 2019 - The scope of the work plan was discussed with personnel at ADEQ offices.

April 29, 2019 - the ASAWP was submitted.

January 6, 2020 - The ASAWP was Approved.

March 6, 2020 - Change Order 1 (ASAWP - drilling cost adjustment) was submitted.

March 9, 2020 - Change Order 1 was approved.

April 8, 2020 - The ASAWP was implemented.

May 18, 2020 - Change Order 2 (ASAWP - additional soil assessment, monitoring well installations and associated sampling activities) was submitted.

June 1, 2020 - Change Order 2 was approved with revisions.

November 16, 2020 - The Additional Site Assessment Report (ASAR) was submitted.

September 1, 2021 - ADEQ requested a second additional site assessment work plan with interim free product removal.

December 3, 2021 - Telephone conference call scoping meeting with ADEE.

March 28, 2022 - The Second Additional Site Assessment Work Plan (2nd ASAWP) with interim free product removal was submitted.

July 27, 2022 - ADEE requested revisions to the 2nd SAWP with interim free product removal.

December 9, 2022 - The revised 2nd ASAWP with revised bid estimates was submitted.

January 9, 2023 - ADEE requested additional revisions to the 2nd SAWP with interim free product removal.

March 31, 2023 - The second revision to the 2nd ASAWP with revised bid estimates was submitted.

October 16, 2023 - The second revision to the 2nd ASAWP with revised bid estimates was Approved.

November 14, 2023 - The second revision to the 2nd ASAWP was implemented.

ADDITIONAL SITE ASSESSMENT
Subsurface Soil and VP Installation Phase

Panky 66 Station

Facility ID # 34000017 - LUST Case # 34-0019 - AFIN # 34-00306

Phase - I Additional Assessment (Soil):

- A total of five (5) additional soil borings were advanced to a vertical depth of approximately twenty-five (~25) vertical feet to identify the level and extent of petroleum constituents in soil. Soil samples were collected from each boring for screening and select samples were submitted for laboratory analysis for the relevant constituents of concern.
- Petroleum constituents were detected in two (2) of the five borings. The two borings, (B-4 & B-5), were angled to extend underneath the facility building. The highest readings for TPH-GRO were collected at approximately 15 feet bgs at 703 ppm & 392 ppm, respectively.
- The soils encountered were primarily clays to approximately ten (10) feet transitioning into clayey sand & sand to boring termination. Wet soil conditions were observed between 15 to 18 feet bgs.
- All of the soil borings were converted into monitoring wells and developed to facilitate the groundwater investigation.
- Groundwater levels of the previously installed monitoring wells was approximately 15 feet bgs.
- Free Product was not detected.
- Vapor Pins were installed within the vacant facility building.

Phase II Additional Assessment (Groundwater sampling)

Groundwater samples have been conducted, however, analytical results have not been received. Analytical and labor costs will be presented in the next Reimbursement Application.

Phase III Additional Assessment (Vapor Sampling)

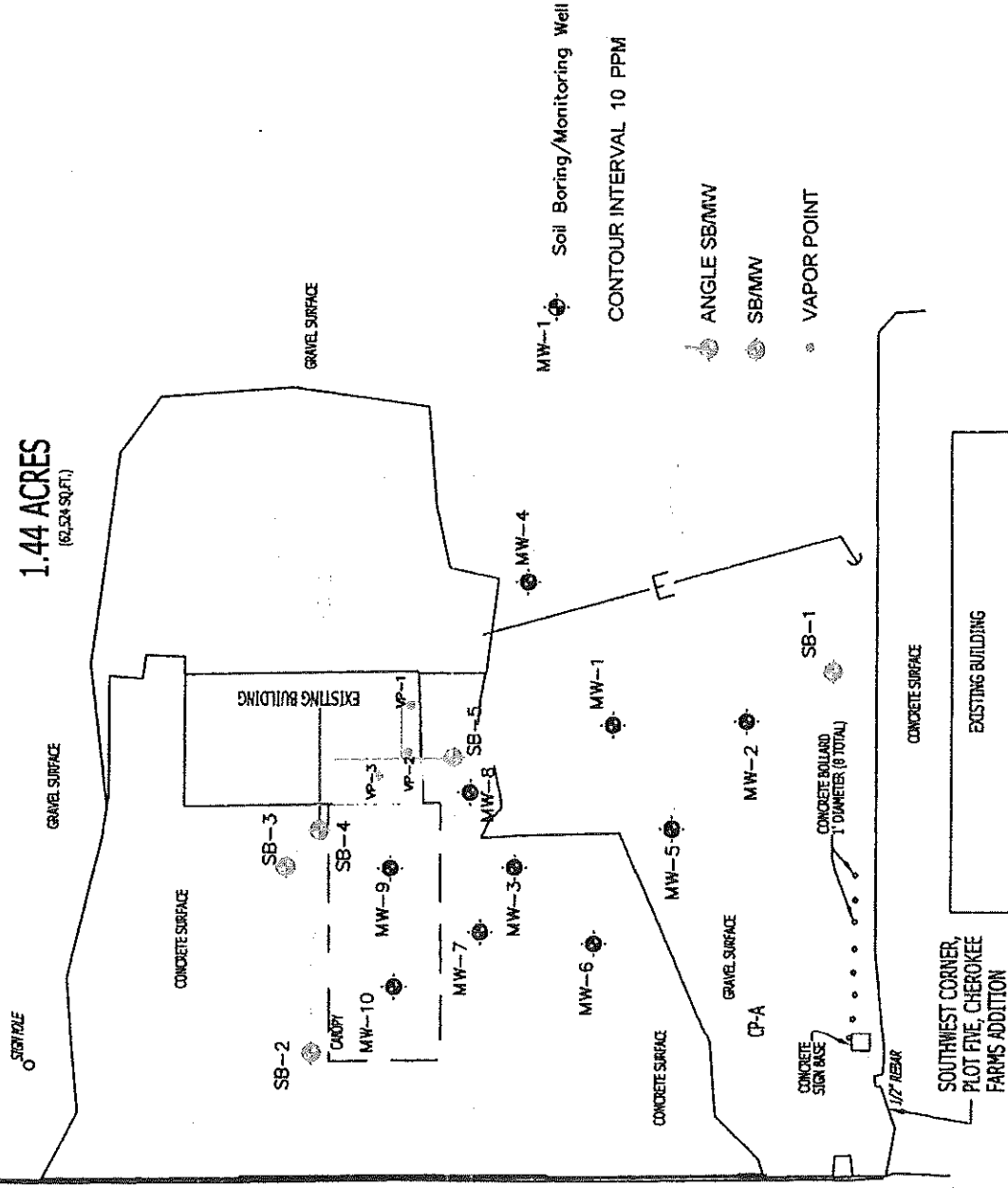
Vapor samples will be collected and analytical and labor costs will be presented in the next Reimbursement Application.

ARKANSAS HIGHWAY NO. 367

LEGEND:

- FOUND MONUMENT (AS NOTED)
- △ COMPUTED POINT (NOT MONUMENTED)
- CONTROL POINT
- UTILITY POLE
- LIGHT POLE
- GUY WIRE
- ⊕ WATER METER
- ⊕ FIRE HYDRANT
- ⊕ SANITARY SEWER MANHOLE
- ⊕ STORM DRAIN MANHOLE
- ⊕ MONITORING WELL
- ⊕ TELECOMMUNICATIONS PEDESTAL
- BOUNDARY LINE
- ← OVERHEAD ELECTRIC LINE
- CHAIN LINK FENCE LINE
- WOOD PRIVACY FENCE LINE

1.44 ACRES
(62,524 SQ.FT.)



TPH Concentrations (ppm)
GRO
August 8, 2020

Monitoring Well #	T.O.C.	TPH/GRO
MW-1	228.55	0.527
MW-2	228.13	10.7
MW-3	229.03	18.8
MW-4	228.85	nd
MW-5	228.75	1.56
MW-6	228.58	1.23
MW-7	228.85	3.46
MW-8	229.26	59.0
MW-9	229.11	27.9
MW-10	228.73	4.78



	ADDITIONAL SITE ASSESSMENT <i>Installed SB/MW/VPW Locations</i>	DRAWING NUMBER 1
	PANKY #66 STATION 716 Highway 367 North - Newport - Arkansas - 72112 FACILITY ID# 34000017; LUST CASE# 34-0019	
SUBMITTED BY: D. DIEHL DRAWN BY: Ridge Surveying CHECKED BY: D. DIEHL	DATE: 5/24/18 REVISED: 3/9/24 FILE NAME: Panky 66	SCALE: BAR

SOUTHWEST CORNER,
PLOT FIVE, CHEROKEE
FARMS ADDITION



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

From: Petroleum Storage Tank Trust Fund Staff

Date: June 26, 2024

Subject: **Former J-Mart #3
3955 Southland Drive
West Memphis, AR 72301
ID #18000068 LUST #18-0123 AFIN 18-00645**

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 February 22, 2024. The RP of this site reported a product release (#18-0123) on March 18, 2014, after completing soil and groundwater sampling and found soil boring exhibiting the highest concentration of volatile organic compounds during a field screening. The name and the address of the RP:

**Capital Fuels of Arkansas LLC
Attn: Tina Beaudoin
140 West 2100 South, Suite 234
Salt Lake City, UT 84115**

The period covered by this application is April 4, 2022, through June 29, 2023. Remediation activities for which reimbursement is requested include: preparation and implementation of the Free Product Removal Work Plan and Cost Estimate, preparation and implementation of the Revised Work Plan to Decommission Wells, and preparation of Reimbursement Application #4.

During MDPE Event #4 on May 9-10, 2022, 15 gallons of free product gasoline, 0.51 vapor-equivalent gallons, and 8,000 gallons of contaminated water were recovered.

The LUST case was closed with a "No Further Action" letter on 7/27/23.

This application includes five (5) invoices from Cobb Environmental & Technical Services, Inc. (CETS) totaling **\$43,527.49**. Included in CETS's invoices are charges from: McCray Drilling (\$8,903.75), Jim's Tank Service (7,666.82), and LP Environmental (\$6,300.00).

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

RECOMMENDATION:

The RP deducted \$412.94 and submitted a claim of \$43,114.55 that was checked against documentation provided. **The following adjustments are recommended: \$100.32 for overage in labor, \$200.00 to reduce equipment rental rate to pre-approved rate, \$19.00 for charges with no receipts, \$34.24 for FedEx charge without a receipt, and \$314.36 for a lump sum charge without justification. Total adjusted amount is \$667.92.** 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	\$43,114.55
Less: Deductible	- 00.00
Less: Adjustments	- <u>667.92</u>
Total Net Claim	<u>\$42,446.63</u>

It is recommended that the claim made by the RP be considered in the amount of \$42,446.63.

Approved Work Plans

18000068 18-0123 FORMER J-MART #3

	<u>Date</u>	<u>Work Plans</u>	<u>Consultant</u>	<u>Amount</u>
01	02/28/2014	Site Assessment Work Plan	Cobb Environm	\$61,544.68
02	12/23/2015	Add'l Site Assessment & Interim Free Product Recovery Work Plan	Cobb Environm	\$63,198.42
03	02/15/2022	Approval of Free Product Removal WP & C.E.	Cobb Environm	\$43,584.47
04	05/17/2023	Approval of WP & C.E. to DW & VP	Cobb Environm	\$20,050.09
				<u>\$188,377.66</u>

Approved Payments

18000068

180123

FORMER J-MART #3

Date Approved

Amount

7 /28/2015

\$50,125.32

12/6 /2016

\$57,131.07

5 /23/2018

\$5,905.07

\$113,161.46

APPLICATION FOR REIMBURSEMENT
from the
PETROLEUM STORAGE TANK TRUST FUND

(1) ADEQ Facility Identification Number: 18000068

(2) Responsible Party Information:

Company Name Capital Fuels of Arkansas LLC
Contact Person Tina Beaudoin
Address 140 West 2100 South, Suite 234
City and State Salt Lake City, UT
Zip Code 84115
Phone 801-870-9693

(3) Release Location

Facility Name Former J-Mart #3
Address 3955 Southland Drive
City and State West Memphis, 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 03/18/2014 Release (LUST) Number 18-0123
-MM

Facility ID# 1800068
Date 01/12/24

CERTIFICATION

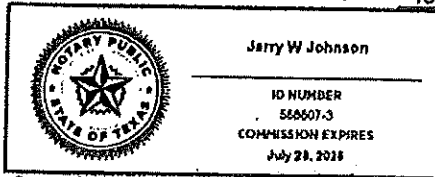
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage 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

Tina Beaudoin, Operations Supervisor
Type/Print name of Owner/Operator or Responsible Party

Tina Marie Beaudoin
Signature of Owner/Operator or Responsible Party

ACKNOWLEDGEMENT

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



Jerry W Johnson
Jerry W Johnson Notary Public
Notary Public, State of Texas County of Tarrant

My Commission Expires: 07/28/2026
Notarized online using audio-video communication

Facility ID# 18000068

Date 01/12/24

PROOF OF PAYMENT AFFIDAVIT

I, Maggie Goolsby 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 PM of Cobb Env. & Tech. Services, I certify that, as of this date, 1/4/2024 has been paid in full by Capital Fuels of Arkansas LLC for the invoices contained in this reimbursement request:

Invoice Number	Invoice Date	Invoice Amount
16496	6/29/2023	\$15,184.50
15438	6/27/2022	\$23,600.38
15301	5/4/2022	\$748.25
15785	10/12/2022	\$2,327.26
15213	4/4/2022	\$1,667.10
Total		\$43,527.49

Signed this 17th day of January, 2024

Maggie Goolsby

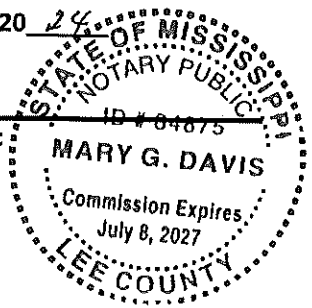
 Maggie Goolsby, PM

ACKNOWLEDGEMENT

Sworn to and subscribed before me this 17th day of January, 2024

Mary G. Davis

 Notary Public



My Commission Expires: July 8, 2027

Interim Request No.	4	COST SUMMARY SHEET				
Consultant /Responsible Party: Capital Fuels of Arkansas, LLC						
Facility Identification #: 18000068			Facility Name: Former J-Mart #3			
Dates current costs incurred:	From	04/04/22	to	06/29/23	Request Date: 01/04/24	
COST SUMMARY						
1. DIRECT LABOR COST (attach labor recap)		Hours	Actual Cost			
Principal/Managerial		6.25	\$270.31	✓		
Professional/Technical		149.25	\$3,278.01	✓		
Support		6.75	\$102.00	✓		
Totals		162.25	\$3,650.32			
Total Actual Labor Costs x 3				\$10,950.95		
2. FIXED RATE COSTS (List by category - attach recap)			Actual Cost			
Equipment Rental			\$300.00	✓		
Per Diem (meals only, with documented overnight stay)			\$50.00	✓		
Mileage			\$735.00	✓		
Other			\$68.25	✓		
Total Fixed Rate Costs				\$1,153.25 ✓		
3. OTHER DIRECT COSTS (List by category - attach recap)			Actual Cost			
Lodging			\$78.71	✓		
Laboratory			\$0.00	✓		
Subcontracts			\$25,299.78	✓		
Supplies			\$0.00	✓		
Other			\$46.80	✓		
Total Other Direct Costs				\$25,425.29 ✓		
4. Reimbursement Preparation Cost for RA#(s) <u>500</u>			(\$500 or \$1000)	\$500.00		
5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)				\$38,029.49		
6. Markup on Total Other Direct Costs (maximum 20%)				\$5,085.06		
7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)				\$43,114.55		
A. Total Reimbursement Requested to Date Including Above:						
B. Less Amount Deductible (\$25,000, \$15,000, or \$7,500)						
C. Less Amount Previously Retained/Disallowed by RST:						
D. Less Amount Previously Received (Reimbursed by ADEQ):						
E. Amount of this Request (same as line 7 above unless it is the 1st Request):						

10,950.95 + 22 ✓
 7,500.00 ✓
 500 + 21 ✓
 110,000.00 ✓
 43,114.55 #

Interim Request No.	4	Page	4	of	16
Consultant /Responsible Party:	Capital Fuels of Arkansas, LLC				
Facility Identification #	18000068	Facility Name:	Former J-Mart #3		
Dates costs Incurred:	From	04/04/22	to	06/29/23	Request date: 01/04/24

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
PRINCIPAL/MANAGERIAL:						
04/26/22	15438	B. Cobb	Free Product Removal	0.50	✓ \$43.25	\$21.63
05/08/22	15438	B. Cobb	Free Product Removal	0.25	✓ \$43.25	\$10.81
05/11/22	15438	B. Cobb	Free Product Removal	0.50	✓ \$43.25	\$21.63
06/22/23	16496	B. Cobb	Well Abandonment	1.00	✓ \$43.25	\$43.25
01/18/22	15213	M. Aycocock	FPR Plan	1.50	✓ \$43.25	\$64.88
01/25/22	15213	M. Aycocock	FPR Plan	2.50	✓ \$43.25	\$108.13
						\$0.00
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ADDITIONAL PRINC/MGR COSTS (from the Extra Direct Labor Page):						
TOTAL PRINCIPAL/MANAGERIAL:				6.25		\$270.31

Revised 01/2016

Interim Request No.	4	Page	5	of	16
Consultant /Responsible Party: Capital Fuels of Arkansas, LLC					
Facility Identification # 18000068			Facility Name: Former J-Mart #3		
Dates costs incurred: From		04/04/22	to	06/29/23	Request date: 01/04/24

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
PROFESSIONAL/TECHNICAL:						
01/12/00	15438	R. Langford	Free Product Remova	0.25	\$22.50	\$5.63
04/28/22	15438	R. Langford	Free Product Remova	0.75	\$22.50	\$16.88
05/04/22	15438	R. Langford	Free Product Remova	2.00	\$22.50	\$45.00
05/05/22	15438	R. Langford	Free Product Remova	3.75	\$22.50	\$84.38
05/06/22	15438	R. Langford	Free Product Remova	3.75	\$22.50	\$84.38
05/08/22	15438	R. Langford	Free Product Remova	2.25	\$22.50	\$50.63
05/09/22	15438	G. Laabs	Free Product Remova	2.25	\$15.25	\$34.31
05/09/22	15438	R. Langford	Free Product Remova	15.00	\$22.50	\$337.50
05/10/22	15438	R. Langford	Free Product Remova	15.00	\$22.50	\$337.50
05/11/22	15438	R. Langford	Free Product Remova	3.25	\$22.50	\$73.13
04/05/22	15301	R. Langford	Free Product Remova	0.75	\$21.66	\$16.25
04/06/22	15301	R. Langford	Free Product Remova	0.75	\$21.66	\$16.25
04/07/22	15301	R. Langford	Free Product Remova	6.75	\$21.67	\$146.27
04/08/22	15301	R. Langford	Free Product Remova	1.00	\$21.66	\$21.66
05/31/22	15785	R. Langford	FP Recovery Report	0.75	\$22.50	\$16.88
06/01/22	15785	R. Langford	FP Recovery Report	1.00	\$22.50	\$22.50
06/06/22	15785	R. Langford	FP Recovery Report	2.00	\$22.50	\$45.00
07/27/22	15785	R. Langford	FP Recovery Report	1.25	\$22.50	\$28.13
07/28/22	15785	R. Langford	FP Recovery Report	1.00	\$22.50	\$22.50
07/29/22	15785	R. Langford	FP Recovery Report	4.00	\$22.50	\$90.00
07/29/22	15785	R. Langford	FP Recovery Report	1.25	\$22.50	\$28.13
07/30/22	15785	R. Langford	FP Recovery Report	4.00	\$22.50	\$90.00
08/01/22	15785	R. Langford	FP Recovery Report	2.25	\$22.50	\$50.63
08/02/22	15785	R. Langford	FP Recovery Report	1.25	\$22.50	\$28.13
08/13/22	15785	R. Langford	FP Recovery Report	2.25	\$22.50	\$50.63
09/12/22	15785	R. Langford	FP Recovery Report	4.50	\$22.50	\$101.25
09/14/22	15785	R. Langford	FP Recovery Report	1.00	\$22.50	\$22.50
09/15/22	15785	R. Langford	FP Recovery Report	1.50	\$22.50	\$33.75
09/16/22	15785	R. Langford	FP Recovery Report	2.00	\$22.50	\$45.00
09/19/22	15785	R. Langford	FP Recovery Report	1.00	\$22.50	\$22.50
09/19/22	15785	M. Aycok	FP Recovery Report	1.00	\$22.00	\$22.00
						\$0.00
ADDITIONAL PROF/TECH COSTS (from the Extra Direct Labor Page):				59.75		\$1,288.77
TOTAL PROFESSIONAL/TECHNICAL COSTS:				149.25		\$3,278.01

Interim Request No.	4	Page	50	of	16
Consultant /Responsible Party:	Capital Fuels of Arkansas, LLC				
Facility Identification #	18000068	Facility Name:	Former J-Mart #3		
Dates costs incurred:	From	04/04/22	to	06/29/23	Request date: 01/04/24

EXTRA DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
Duplicate this page as needed to record each type of Direct Labor						
11/04/22	16496	R. Langford	Well Decom & Aband	0.50	\$22.50	\$11.25
12/07/22	16496	R. Langford	Well Decom & Aband	3.25	\$22.50	\$73.13
12/09/22	16496	R. Langford	Well Decom & Aband	0.50	\$22.50	\$11.25
12/13/22	16496	R. Langford	Well Decom & Aband	1.25	\$22.50	\$28.13
12/14/22	16496	R. Langford	Well Decom & Aband	1.00	\$22.50	\$22.50
12/16/22	16496	R. Langford	Well Decom & Aband	1.00	\$22.50	\$22.50
01/05/23	16496	R. Langford	Well Decom & Aband	0.75	\$22.50	\$16.88
01/06/23	16496	R. Langford	Well Decom & Aband	0.25	\$22.50	\$5.63
01/10/23	16496	R. Langford	Well Decom & Aband	1.50	\$22.50	\$33.75
01/11/23	16496	R. Langford	Well Decom & Aband	0.25	\$22.50	\$5.63
01/13/23	16496	R. Langford	Well Decom & Aband	0.50	\$22.50	\$11.25
02/08/23	16496	R. Langford	Well Decom & Aband	0.50	\$22.50	\$11.25
02/23/23	16496	R. Langford	Well Decom & Aband	0.50	\$22.50	\$11.25
03/01/23	16496	R. Langford	Well Decom & Aband	1.75	\$22.50	\$39.38
03/02/23	16496	R. Langford	Well Decom & Aband	1.50	\$22.50	\$33.75
03/08/23	16496	R. Langford	Well Decom & Aband	2.00	\$22.50	\$45.00
05/30/23	16496	R. Langford	Well Decom & Aband	1.00	\$22.50	\$22.50
05/31/23	16496	R. Langford	Well Decom & Aband	4.25	\$22.50	\$95.63
06/08/23	16496	R. Langford	Well Decom & Aband	1.50	\$22.50	\$33.75
06/14/23	16496	R. Langford	Well Decom & Aband	0.75	\$22.50	\$16.88
06/16/23	16496	R. Langford	Well Decom & Aband	1.50	\$22.50	\$33.75
06/19/23	16496	R. Langford	Well Decom & Aband	1.50	\$22.50	\$33.75
06/22/23	16496	R. Langford	Well Decom & Aband	1.00	\$22.50	\$22.50
06/28/23	16496	R. Langford	Well Decom & Aband	1.00	\$22.50	\$22.50
01/18/22	15213	M. Goolsby	FPR Plan	3.00	\$33.44	\$100.32
01/19/22	15213	M. Goolsby	FPR Plan	6.00	\$33.44	\$200.64
06/05/23	16496	G. Laabs	Well Decom & Aband	10.25	\$15.25	\$156.31
06/06/24	16496	G. Laabs	Well Decom & Aband	9.75	\$15.25	\$148.69
06/09/24	16496	G. Laabs	Well Decom & Aband	0.50	\$15.25	\$7.63
06/02/24	16496	G. Laabs	Well Decom & Aband	0.75	\$15.25	\$11.44
						\$0.00
						\$0.00
						\$0.00
						\$0.00

Manually enter these totals on the corresponding "Direct Labor" page: 59.75 \$1,288.77

Interim Request No.	4	Page	6	of	16	
Consultant /Responsible Party:	Capital Fuels of Arkansas, LLC					
Facility Identification #	18000068	Facility Name:	Former J-Mart #3			
Dates costs incurred:	From	04/04/22	to	06/29/23	Request date: 01/04/24	
DIRECT LABOR COST DETAIL						
DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
SUPPORT:						
07/29/22	15785	B. Jenkins	FP Recovery Report	1.75 /	\$15.00	\$26.25
07/30/22	15785	B. Jenkins	FP Recovery Report	1.00 /	\$15.00	\$15.00
08/02/22	15785	B. Jenkins	FP Recovery Report	1.00 /	\$15.00	\$15.00
						\$0.00
06/21/23	16496	M. Davis	Well Abandonment	- 1.00	\$15.25	\$15.25
06/22/23	16496	M. Davis	Well Abandonment	- 0.75 /	\$15.25	\$11.44
06/23/23	16496	M. Davis	Well Abandonment	- 0.25 /	\$15.25	\$3.81
						\$0.00
01/26/22	15213	M. Davis	FPR Plan	1.00 /	\$15.25	\$15.25
						\$0.00
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ADDITIONAL SUPPORT COSTS (from the Extra Direct Labor Page):						
TOTAL SUPPORT COSTS:				6.75		\$102.00
TOTAL DIRECT LABOR COSTS:				162.25		\$3,650.32

Interim Request No.	4	Page	7	of	16
Consultant /Responsible Party: Capital Fuels of Arkansas, LLC					
Facility Identification # 18000068			Facility Name: Former J-Mart #3		
Dates costs incurred: From		04/04/22	to	06/29/23	Request date: 01/04/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	VENDOR AND WORK PLAN TASK	UNITS	RATE	AMOUNT
EQUIPMENT RENTAL					
06/27/22	15438	Oil/Water Interface Probe for 5/9 & 5/10/2022	2	\$75.00	\$150.00
06/29/23	16496	Oil/Water Interface Probe for 6/5 & 6/6/2023	2	\$75.00	\$150.00
					\$0.00
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ADDITIONAL EQUIPMENT RENTAL (from the Extra Fixed Rate Costs page):		
TOTAL EQUIPMENT RENTAL:		\$300.00

Interim Request No.	4	Page 8 of 16		
Consultant /Responsible Party:	Capital Fuels of Arkansas, LLC			
Facility Identification #	18000068	Facility Name: Former J-Mart #3		
Dates costs incurred:	From 04/04/22	to 06/29/23	Request date: 01/04/24	

FIXED RATE COSTS DETAIL

DATE	INVOICE#	TRAVELER AND WORK PLAN TASK	# OF NIGHTS	RATE	AMOUNT
MEAL PER DIEM:					
06/05/23	16496	G. Laabs, Well Abandonment	1	\$50.00	\$50.00
					\$0.00
					\$0.00
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ADDITIONAL MEAL PER DIEM COSTS (from the Extra Fixed Rate Costs page):					
TOTAL MEAL PER DIEM COSTS:					\$50.00

Interim Request No.	4	Page	9	of	16
Consultant /Responsible Party:		Capital Fuels of Arkansas, LLC			
Facility Identification #		18000068			
		Facility Name: Former J-Mart #3			
Dates costs incurred:		From	04/04/22	to	06/29/23
					Request date:
01/04/24					

FIXED RATE COSTS DETAIL

DATE	INVOICE#	ROUTE AND WORK PLAN TASK	# OF MILES	RATE	AMOUNT
MILEAGE:					
05/09/22	15438	Tupelo, MS to West Memphis, AR	105.00	\$0.70	\$73.50
05/09/22	15438	West Memphis, AR to Tupelo, MS	105.00	\$0.70	\$73.50
05/09/22	15438	Tupelo, MS to West Memphis, AR	105.00	\$0.70	\$73.50
05/09/22	15438	West Memphis, AR to Tupelo, MS	105.00	\$0.70	\$73.50
05/10/22	15438	Tupelo, MS to West Memphis, AR	105.00	\$0.70	\$73.50
05/10/22	15438	West Memphis, AR to Tupelo, MS	105.00	\$0.70	\$73.50
					\$0.00
04/07/22	15301	Tupelo, MS to West Memphis, AR	105.00	\$0.70	\$73.50
04/07/22	15301	West Memphis, AR to Tupelo, MS	105.00	\$0.70	\$73.50
					\$0.00
06/05/23	16496	Tupelo, MS to West Memphis, AR	105.00	\$0.70	\$73.50
06/06/23	16496	West Memphis, AR to Tupelo, MS	105.00	\$0.70	\$73.50
					\$0.00
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					\$0.00
					\$0.00
					\$0.00
					\$0.00
ADDITIONAL MILEAGE COSTS (from the Extra Fixed Rate Costs page):					\$0.00
TOTAL MILEAGE COSTS:					\$735.00

Revised 01/2016

Interim Request No.	4	Page	10	of	16
Consultant /Responsible Party:	Capital Fuels of Arkansas, LLC				
Facility Identification #	18000068	Facility Name:	Former J-Mart #3		
Dates costs incurred:	From	04/04/22	to	06/29/23	Request date: 01/04/24

FIXED RATE COSTS DETAIL

DATE	INVOICE#	DESCRIPTION AND WORK PLAN TASK	AMOUNT
OTHER:			
06/29/23	16496	Copy/Scan for Well Abandonment@ 0.25/page 29 pages = 7.25	\$7.25
06/29/23	16496	Document Shipping for Work Plan/CE	\$29.57 ✓
06/29/23	16496	Copy/Scan for Work Plan/CE @ 0.25/page 12 pages = 3.00	\$3.00
06/29/23	16496	Document Shipping for Well Abandonment Report	\$19.68 ✓
01/26/22	15213	Photocopying for Work Plan @0.25/page 35 pages	\$8.75
ADDITIONAL OTHER FIXED RATE COSTS (from Extra Fixed Rate Costs page):			\$0.00
TOTAL OTHER FIXED RATE COSTS:			\$68.25 ✓
TOTAL FIXED RATE COSTS			\$1,153.25 ✓

Revised 01/2016

Interim Request No.	4	Page 11 of 16		
Consultant /Responsible Party: Capital Fuels of Arkansas, LLC				
Facility Identification # 18000068		Facility Name: Former J-Mart #3		
Dates costs incurred: From 04/04/22 to 06/29/23		Request date: 01/04/24		
OTHER DIRECT COSTS DETAIL				
DATE	INVOICE#	TRAVELER'S NAME, # OF NIGHTS AND WORK PLAN TASK	AMOUNT	
LODGING:				
06/05/23	16496	G. Laabs, 1 Night, Well Abandonment	\$78.71	
ADDITIONAL LODGING COSTS (from the Extra Other Direct Costs page):			\$0.00	
TOTAL LODGING COSTS:			\$78.71	

Interim Request No.	4	Page	13	of	16
Consultant /Responsible Party:	Capital Fuels of Arkansas, LLC				
Facility Identification #	18000068	Facility Name:	Former J-Mart #3		
Dates costs incurred:	From	04/04/22	to	06/29/23	Request date: 01/04/24

OTHER DIRECT COSTS DETAIL

DATE	INVOICE#	DESCRIPTION AND WORK PLAN TASK	AMOUNT
SUBCONTRACTS:			
05/12/22	22-2004	LP Environmental - Free Product Removal ✓	\$6,300.00
05/13/22	05122238A	Jim's Tank Service, LLC - Removal of PCW - Free Product Removal ✓	\$7,666.82
05/18/22	206016151-0	United Rentals - Frac Tank - Free Product Removal ✓	\$1,866.91
05/11/22	68125	Eon Products - FID Rental - Free Product Removal ✓	\$411.91
05/09/22	9870728	NexAir- Hydrogen Gas - Free Product Removal ✓	\$150.39
06/07/23	1012630	McCray Drilling, LLC - Well Abandonment	\$8,903.75
ADDITIONAL SUBCONTRACTS COSTS (from the Extra Other Direct Costs page):			\$0.00
TOTAL SUBCONTRACTS COSTS:			\$25,299.78



Cobb Environmental & Technical Services, Inc.

Invoice

PO Box 1602
Tupelo, MS 38802
662.841.0995

Date	Invoice #
6/29/2023	16496

Bill To
Capital Fuels, LLC 140 W 2100 S, STE234 Salt Lake City, UT 84115

Ship To
Blu - Former J-Mart #3 3955 Southland Drive West Memphis, AR 72301

Terms	P.O. No.	Project
NET 10	Contract	3074E

A service charge of 1.5% per month will be added for invoices not paid within 30 days.

Qty	Description	Rate	Amount
	Scope of Work: Perform Well Decommissioning and Abandonment - Completed 6/5/23		
1	Professional Services (Work Plan, Proposal, Field Activities, Report Preparation, Report Review, Administrative)	4,500.00	4,500.00
1	Subcontract Drilling Services - McCray Drilling Invoice #1012630 + Markup	10,684.50	10,684.50

For questions about this invoice, please call Accounts Receivable at 662.841.0995

We appreciate your business!

Total	\$15,184.50
Payments/Credits	\$0.00
Balance Due	\$15,184.50

Breakdown of the \$4,500 lump charge on inv # 16496

Date	Invoice #	Personnel	Task	Hours	Rate	Total
06/21/23	16496	M. Davis	Well Abandonment	1.00	\$15.25	\$15.25
06/22/23	16496	M. Davis	Well Abandonment	0.75	\$15.25	\$11.44
06/23/23	16496	M. Davis	Well Abandonment	0.25	\$15.25	\$3.81
11/04/22	16496	R. Langford	Well Decom & Aband	0.50	\$22.50	\$11.25
12/07/22	16496	R. Langford	Well Decom & Aband	3.25	\$22.50	\$73.13
12/09/22	16496	R. Langford	Well Decom & Aband	0.50	\$22.50	\$11.25
12/13/22	16496	R. Langford	Well Decom & Aband	1.25	\$22.50	\$28.13
12/14/22	16496	R. Langford	Well Decom & Aband	1.00	\$22.50	\$22.50
12/16/22	16496	R. Langford	Well Decom & Aband	1.00	\$22.50	\$22.50
01/05/23	16496	R. Langford	Well Decom & Aband	0.75	\$22.50	\$16.88
01/06/23	16496	R. Langford	Well Decom & Aband	0.25	\$22.50	\$5.63
01/10/23	16496	R. Langford	Well Decom & Aband	1.50	\$22.50	\$33.75
01/11/23	16496	R. Langford	Well Decom & Aband	0.25	\$22.50	\$5.63
01/13/23	16496	R. Langford	Well Decom & Aband	0.50	\$22.50	\$11.25
02/08/23	16496	R. Langford	Well Decom & Aband	0.50	\$22.50	\$11.25
02/23/23	16496	R. Langford	Well Decom & Aband	0.50	\$22.50	\$11.25
03/01/23	16496	R. Langford	Well Decom & Aband	1.75	\$22.50	\$39.38
03/02/23	16496	R. Langford	Well Decom & Aband	1.50	\$22.50	\$33.75
03/08/23	16496	R. Langford	Well Decom & Aband	2.00	\$22.50	\$45.00
05/30/23	16496	R. Langford	Well Decom & Aband	1.00	\$22.50	\$22.50
05/31/23	16496	R. Langford	Well Decom & Aband	4.25	\$22.50	\$95.63
06/08/23	16496	R. Langford	Well Decom & Aband	1.50	\$22.50	\$33.75
06/14/23	16496	R. Langford	Well Decom & Aband	0.75	\$22.50	\$16.88
06/16/23	16496	R. Langford	Well Decom & Aband	1.50	\$22.50	\$33.75
06/19/23	16496	R. Langford	Well Decom & Aband	1.50	\$22.50	\$33.75
06/22/23	16496	R. Langford	Well Decom & Aband	1.00	\$22.50	\$22.50
06/28/23	16496	R. Langford	Well Decom & Aband	1.00	\$22.50	\$22.50
06/22/23	16496	B. Cobb	Well Abandonment	1.00	\$43.25	\$43.25
06/02/23	16496	G. Laabs	Well Decom & Aband	0.75	\$15.25	\$11.44
06/05/23	16496	G. Laabs	Well Decom & Aband	10.25	\$15.25	\$156.31
06/06/24	16496	G. Laabs	Well Decom & Aband	9.75	\$15.25	\$148.69
06/09/24	16496	G. Laabs	Well Decom & Aband	0.50	\$15.25	\$7.63

\$3,184.69

Date	Invoice #	Travel	Mileage	Rate	Total
06/05/23	16496	Tupelo, MS to West Memphis, AR	105.00	\$0.70	\$73.50
06/06/23	16496	West Memphis, AR to Tupelo, MS	105.00	\$0.70	\$73.50

\$147.00

Date	Invoice #	Per Diem	Quantity	Rate	Total
06/05/23	16496	G. Laabs, Well Abandonment	1	\$50.00	\$50.00

\$50.00

Date	Invoice #	Lodging	Quantity	Rate	Markup	Total
06/05/23	16496	G. Laabs, 1 Night, Well Abandonment	1	\$78.71	\$15.74	\$94.45

\$94.45

Date	Invoice #	Document Shipping	Total
06/29/23	16496	Copy/Scan for Well Abandonment @ 0.25/page 29 pages	\$7.25
06/29/23	16496	Document Shipping for Well Abandonment Report	\$19.68
06/29/23	16496	Copy/Scan for Work Plan/CE @ 0.25/page 12 pages = 3.00	\$3.00
06/29/23	16496	Document Shipping for Work Plan/CE	\$29.57

\$59.50

Date	Invoice #	Equipment	Quantity	Rate	Total
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06/29/23	16496	Oil/Water Interface Probe for 6/5 & 6/6/2023	2	\$75.00	\$150.00
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\$150.00

Date	Invoice #	Reimbursement Package Preparation	Quantity	Rate	Total
06/29/23	16496	Reimbursement Package Preparation	1	\$500.00	\$500.00

\$500.00

\$4,185.64



Cobb Environmental & Technical Services, Inc.

Invoice

PO Box 1602
Tupelo, MS 38802
662.841.0995

Date	Invoice #
6/27/2022	15438

Bill To
Capital Fuels, LLC 140 W 2100 S, STE234 Salt Lake City, UT 84115

Ship To
Blu - Former J-Mart #3 3955 Southland Drive West Memphis, AR 72301

Terms	P.O. No.	Project
NET 10	Agreement	3074E

A service charge of 1.5% per month will be added for invoices not paid within 30 days.

Qty	Description	Rate	Amount
	Scope of Work: Implement Free Product Removal Plan - Field Activities through 5/11/22 - Interim Invoice.		
0.5	Principal - Environmental Professional - Review Scope of Work and Prepare for Implementation - 4/26/22	129.75	64.88
12.75	Project Manager - Review Task, Coordination, Communication - 4/26 through 5/8/22	67.50	860.63
0.25	Principal - Environmental Professional - Discuss Implementation of Scope of Work	129.75	32.44
2.25	Environmental Technician - 5/9/22	45.75	102.94
30	Project Manager - Supervise Vacuuming Event - 5/9/22 and 5/10/22	67.50	2,025.00
3.25	Project Manager - Equipment handling/Communication with Shinn and Principal	67.50	219.38
0.5	Principal - Environmental Professional - Discuss Results of Field Activities	129.75	64.88
2	Oil/Water Interface Probe 5/9 & 5/10/22	75.00	150.00
210	Company Truck (GL) <i>Perd Trip - 81</i>	0.70	147.00
210	Company Truck (RL) "	0.70	147.00
210	Company Truck (RL) "	0.70	147.00
1	Subcontractor - LP Environmental - Vacuum System + 20%	7,560.00	7,560.00
1	Equipment Rental - Frac Tank Rental - United Rentals + 20%	2,204.29	2,204.29
1	Equipment Rental - FID - Eon + 20%	494.29	494.29
1	Equipment Rental - Hydrogen Gas - Nexair + 20%	180.47	180.47
1	Subcontractor - Jim's Tank Service + 20%	9,200.18	9,200.18

For questions about this invoice, please call Accounts Receivable at 662.841.0995

We appreciate your business!

Total	\$23,600.38
Payments/Credits	\$0.00
Balance Due	\$23,600.38



Cobb Environmental & Technical Services, Inc.

PO Box 1602
Tupelo, MS 38802
662.841.0995

Invoice

Date	Invoice #
5/4/2022	15301

Bill To
Capital Fuels, LLC. 140 W 2100 S, STE234 Salt Lake City, UT 84115

Ship To
Blu - Former J-Mart #3 3955 Southland Drive West Memphis, AR 72301

Terms	P.O. No.	Project
NET 10	Agreement	3074E

A service charge of 1.5% per month will be added for invoices not paid within 30 days.

Qty	Description	Rate	Amount
	Scope of Work: Staff Professional meeting with water disposal and transportation company to obtain sample for waste profiling. This time includes coordination and onsite meeting with company. Meeting Completed on 4/7/22		
✓ 1.5 ✓	Staff Professional - Coordination (4/5 & 4/6)	65.00	97.50
✓ 6.75 ✓	Staff Professional - Onsite Meeting (4/7)	65.00	438.75
✓ 1 ✓	Staff Professional - Follow-up Discussions (4/8)	65.00	65.00
✓ 210	Company Auto (road trip) (1)	0.70	147.00

For questions about this invoice, please call Accounts Receivable at 662.841.0995

We appreciate your business!

Total	\$748.25
Payments/Credits	\$0.00
Balance Due	\$748.25



Cobb Environmental & Technical Services, Inc.

Invoice

PO Box 1602
Tupelo, MS 38802
662.841.0995

Date	Invoice #
10/12/2022	15785

Bill To
Capital Fuels, LLC 140 W 2100 S, STE234 Salt Lake City, UT 84115

Ship To
Blu - Former J-Mart #3 3955 Southland Drive West Memphis, AR 72301

Terms	P.O. No.	Project
NET 10	Agreement	3074E

A service charge of 1.5% per month will be added for invoices not paid within 30 days.

Qty	Description	Rate	Amount
	Scope of Work: Prepare Free Product Recovery Report - Completed 9/19/22		
✓29.75	Environmental Professional - Report Preparation (Robert Langford)	67.50	2,008.13
✓3.75	Administrative - Prepare Tables	45.00	168.75
✓1.25	Environmental Professional - Auto Cad (Robert Langford)	67.50	84.38
✓.1	Senior Review(Melvin Aycock)	66.00	66.00
<p><i>For questions about this invoice, please call Accounts Receivable at 662.841.0995</i></p> <p><i>We appreciate your business!</i></p>		Total	\$2,327.26
		Payments/Credits	\$0.00
		Balance Due	\$2,327.26



Cobb Environmental & Technical Services, Inc.

Invoice

PO Box 1602
Tupelo, MS 38802
662.841.0995

Date	Invoice #
4/4/2022	15213

Bill To
Capital Fuels, LLC 140 W 2100 S, STE234 Salt Lake City, UT 84115

Ship To
Blu - Former J-Mart #3 3955 Southland Drive West Memphis, AR 72301

Terms	P.O. No.	Project
NET 10	Agreement	3074E

A service charge of 1.5% per month will be added for invoices not paid within 30 days.

Qty	Description	Rate	Amount
	Scope of Work: Review and Prepare Updated Free Product Removal Plan (Revision #1) Completed January 18, 2022		
10	Project Manager (Prepare Work Plan)	100.32	1,003.20
4	Principal (Solicited Updated Subcontractor Pricing/Final Review)	129.75	519.00
1	Clerical (copying and binding)	45.75	45.75
35	Photocopying	0.25	8.75
1	Fed Ex + 20%	90.40	90.40
<p><i>For questions about this invoice, please call Accounts Receivable at 662.841.0995</i></p> <p><i>We appreciate your business!</i></p>		Total	\$1,667.10
		Payments/Credits	\$0.00
		Balance Due	\$1,667.10



ARKANSAS ENERGY & ENVIRONMENT

MEMORANDUM

Matthew McGhee 4/30/24

To: Jacqueline Trotta, Trust Fund Administrator
Assessment & Remediation Program, Office of Land Resources

Through: Blake Whittle, P.G., Groundwater Branch Manager *BW 4/29/24*
Joshua Stevens, P.G., Geologist Supervisor, Regulated Storage Tanks *JS*
A & R Program, OLR

From: Mikel R. Shinn, Professional Geologist *M.R.S.*
RST, A & R Program, OLR

Date: April 23, 2024

Subject: Technical Review of Reimbursement Application #4
For Time Period: April 4, 2022 – June 29, 2023
Amount Requested: \$43,114.55
Former J-Mart #3 (“Capital Fuels Arkansas, LLC”)
3955 Southland Dr.
West Memphis, AR 72301
ID #18000068 LUST #18-0123 AFIN #18-00645

The following is in response to your memo to me dated 2/26/24.

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?*

The LUST case was closed with a “No Further Action” letter on 7/27/23.

- 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.*

In an *Exposure Assessment* dated 12/21/18, free product removal “to the maximum extent practicable”, in accordance with 40 CFR §280.64, was stated as a “clean-up goal” for the case. Adequate clean-up was achieved through implementation of a *Free Product Removal Work Plan and Cost Estimate (Revision #1)* approved by RST on a 2/15/22.

- 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 500 cubic yards of contaminated backfill and soils were excavated during voluntary UST closure operations in 2013. An estimated total of 9.83 vapor-equivalent gallons of gasoline were recovered during three single-day Mobile Dual Phase Extraction (MDPD) events conducted in 2016-2017. Approximately 8,450 gallons of contaminated water were removed during the three events, plus an additional (unnumbered) event for which gasoline recovery data was lost. During MDPE Event #4 on May 9-10, 2022, 15 gallons of free product gasoline, 0.51 vapor-equivalent gallons and 8000 gallons of contaminated water were recovered.

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.*

- Preparation and implementation of the *Free Product Removal Work Plan and Cost Estimate (Revision #1)* by Cobb Environmental & Technical Services, Inc., on behalf of Capital Fuels of Arkansas LLC, which was submitted on 1/27/22 and approved on 2/15/22 in the amount of **\$43,584.47**. This application covers work plan development and the performance of MDPE Event #4 on 5/9-10/22 (two 12-hour days). A *Free Product Recovery Corrective Action Report* was submitted to RST on 10/5/22.
- Preparation and implementation of a *Revised Work Plan and Cost Estimate to Decommission Wells* which was submitted by Cobb on 2/13/23 and approved on 5/17/23 in the amount of **\$20,050.09**. A *Monitoring Wells Abandonment Report* was submitted by Cobb on 6/19/23.
- Preparation of this reimbursement application (**\$500.00**).

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

No activity conflicts with Rule 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.*

Cobb Environmental 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.*

Cobb has included a "Site Map Showing Monitoring Well Locations" from the *Free Product Recovery Corrective Action Report* (10/5/22).

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

No additional data or graphs have been generated.



RECEIVED

FEB 22 2024

DEQ - RST

Cobb Environmental & Technical Services, Inc.

Construction • Fueling Systems • Environmental

February 16, 2024

Arkansas Department of Environmental Quality
Office of Land Resources

Attention: Jacqueline Trotta, Trust Fund Administrator
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Application for Reimbursement from the Petroleum Storage Tank Trust Fund
Former J-Mart # 3
3955 Southland Drive
West Memphis, Crittenden County, Arkansas

ID # 18000068 LUST Case # 18-0123 AFIN # 18-00645

Dear Ms. Trotta:

Cobb Environmental & Technical Services, Inc. (CETS) if pleased to submit the Application for Reimbursement from the Petroleum Storage Tank Trust Fund for the above referenced site. If you have any questions or require any additional information, please contact the undersigned.

Very truly yours,
Cobb Environmental & Technical Services, Inc.

Maggie Goolsby
Project Manager

Former J-Mart #2
3955 Southland Drive
West Memphis, AR 72301
LUST # 18-0123; FID # 18000068; AFIN # 18-00645

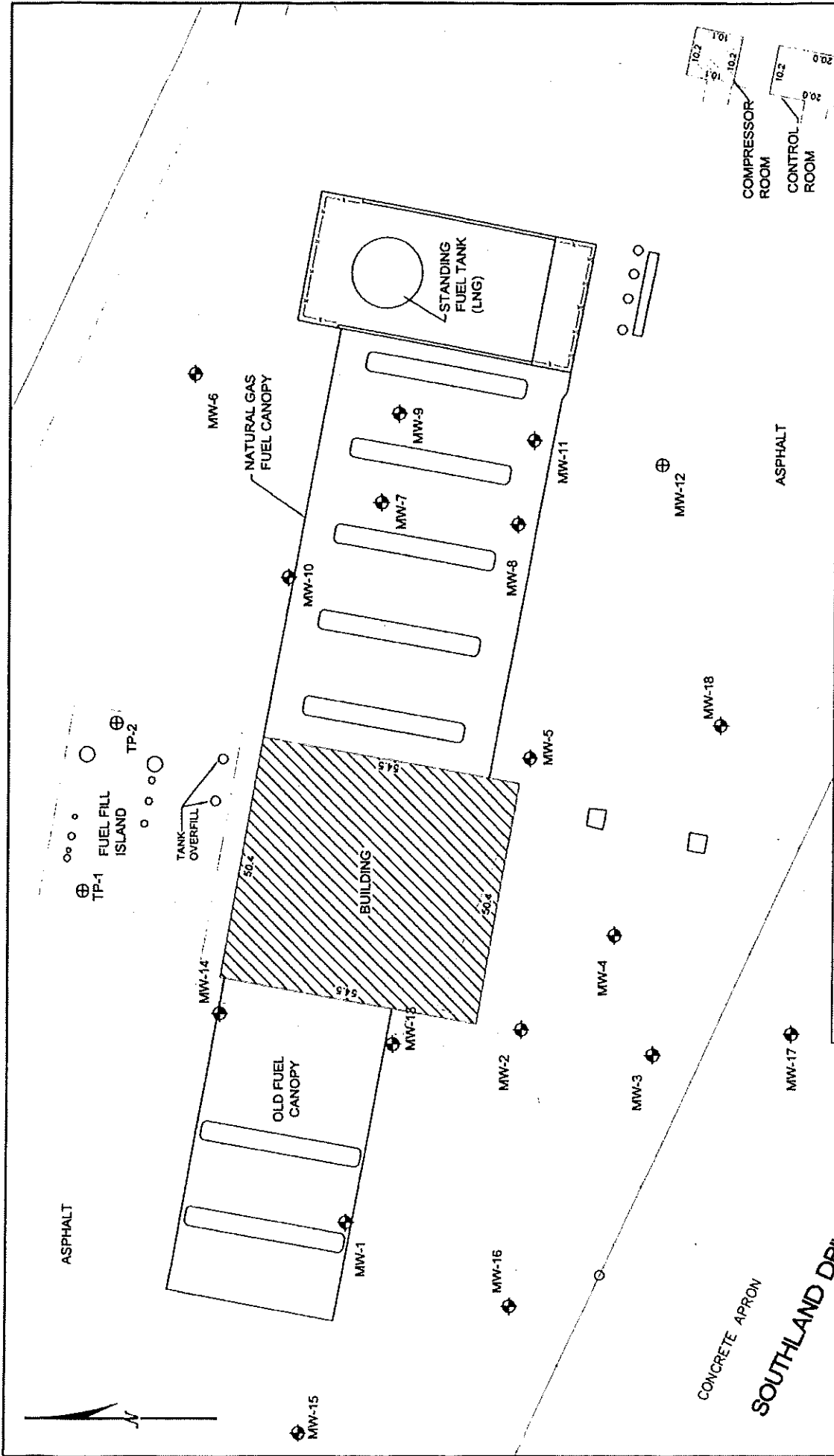
On January 18, 2022, CETS submitted to the Department a Free Product Removal Work Plan and Cost Estimate for the removal of free product from monitoring wells MW-2, MW-4, and MW-13 through Multi-Phase Dual Phase Extraction (MDPE) Events.

On April 7, 2022, at the request of Valicor Environmental Services (Valicor), CETS mobilized to the site to facilitate the collection of a representative disposal sample from well MW-5 for the purposes of initial characterization of the petroleum contact water (PCW), which would be used to complete a disposal profile. Valicor confirmed that the Flash Point was too low for Valicor's Memphis Treatment Facility. CETS notified the Department, and was able to locate a local treatment and disposal facility, Jim's Tank Service, to transport for treatment and disposal. On May 6, 2022, CETS rented a 20,000 gallon "frac tank" and gauged the site wells.

On May 9, 2022, CETS and LP Environmental mobilized to the site to perform MPDE Event #4. MPDE Event #4 was performed for 12 hours on May 9, 2022, and on May 10, 2022, MPDE Event #5 was performed for 12 hours. An estimated 8,000-gallons of PCW was removed and transported to Jim's Tank Service/Wastewater Solutions LLC in West Memphis, AR.

On May 24, 2022, CETS mobilized to the site to measure fluid levels in all monitoring wells. A total of 0.05 feet of free product was measured in well MW-2. CETS submitted the final report to the Department on September 13, 2022. The Department chose not to conduct a follow up MPDE Event and requested a work plan and cost estimate to decommission the wells.

On January 10, 2023, CETS submitted to the Department a Work Plan and Cost Estimate to Decommission Wells. On June 5, 2023, CETS and McCray Drilling mobilized to the site to plug and abandon 20 monitoring wells consisting of 17 groundwater monitoring wells, MW-1 through MW-17, and three (3) vapor points, VP-1 through VP-3. A total of 525 linear feet was plugged. Each well and vapor points were opened, and the wells were then plugged with a grout mixture of Portland cement, bentonite, and tap water. This mixture was pumped and tremmied into the borehole from total depth to approximately 4 inches below ground surface. The grout was allowed to settle and then topped off as needed. For the monitoring wellheads and pads located in grassy areas, the wellheads and pads were removed and the hole was topped off with native soil. For monitoring wellheads and pads located in the concrete paved areas; the wellheads and pads were removed and the hole was topped off with asphaltic concrete, and for the vapor monitoring points, the vapor point fittings were removed and the vapor point was filled with concrete and mortar filler and sealant. A report was submitted to the Department on June 19, 2023.



Site Map Showing Monitoring Well Locations

Former J-Mart # 3
 3955 Southland Drive
 West Memphis, Crittenden County, Arkansas

ID # 18000068 LUST Case # 18-0123 AFIN # 18-00645

CETS Cobb Environmental & Technical Services, Inc.
 871 South Green Street
 Tupelo, Mississippi 38804

Base Map By:
Sound Consulting Engineers
 1000 West 1st Street
 Gulfport, Mississippi 39503
 Cell Engineers and Laser Survey



Project # E-3074 Figure: 1



**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: June 26, 2024

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

A request for reimbursement #15 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 (#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 July 1, 2023 through September 27, 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 #15.

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 **\$22,095.09**. Included in PPM's invoice are charges from Waypoint Analytical (\$1,020.00).

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

RECOMMENDATION:

The claimed cost of **\$22,095.09** 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:

Claim filed- Form TF-1	\$22,095.09
Less: Deductible	- 00.00
Less: Adjustments	- 00.00
Total Net Claim	<u>\$ 22,095.09</u>

It is recommended that the claim made by the RP be considered in the amount of **\$22,095.09**.

09000027-15 LUST #09-0010 MM, JT

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
				<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/>
	\$964,133.68
	<hr/> <hr/>

RA #15

APPLICATION FOR REIMBURSEMENT
from the
PETROLEUM STORAGE TANK TRUST FUND

RECEIVED

FEB - 1 2024

DEQ - RST

(1) ADEQ Facility Identification Number: 09000027 *Afin*
09-00175

(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 11/06/23

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 15 day of November, 2023.

Karlayon

Notary Public

My Commission Expires: 03/13/2027

KARLAYON
NOTARY PUBLIC
Mecklenburg County
North Carolina
My Commission Expires 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
98093	9/30/2023	\$22,095.09
Total		\$22,095.09

Signed this _____ day of _____, 20__

Shawn Ivey

Shawn Ivey

ACKNOWLEDGEMENT

Sworn to and subscribed before me this 4 day of December, 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.	15	COST SUMMARY SHEET				
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	07/01/23	to	09/27/23	Request Date: 10/02/23	
COST SUMMARY						
1. DIRECT LABOR COST (attach labor recap)		Hours	Actual Cost			
Principal/Managerial		50.25	\$2,098.69			
Professional/Technical		117.50	\$3,292.55			
Support		5.00	\$89.79			
Totals		172.75	\$5,481.03			
Total Actual Labor Costs x 3					\$16,443.08	
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				\$1,664.60		
Other				\$0.00		
Total Fixed Rate Costs					\$1,664.60	
3. OTHER DIRECT COSTS (List by category - attach recap)				Actual Cost		
Lodging				\$0.00		
Laboratory				\$1,020.00		
Subcontracts				\$0.00		
Supplies				\$0.00		
Other				\$1,804.43		
Total Other Direct Costs					\$2,824.43	
4. Reimbursement Preparation Cost for RA#(s) <u>15</u>		(\$500 or \$1000)			\$500.00	
5. TOTAL ACTUAL COSTS (Labor + Fixed Costs + Other Direct Costs +RA Prep)					\$21,432.11	
6. Markup on Total Other Direct Costs (maximum 20%)					\$662.99	
7. TOTAL CLAIM AMOUNT (Enter total amount claimed for reimbursement)					\$22,095.09	
A. Total Reimbursement Requested to Date Including Above:					\$598,098.38	
B. Less Amount Deductible (\$25,000, \$15,000, or \$7,500)					\$7,500.00	
C. Less Amount Previously Retained/Disallowed by RST:					\$13,262.74	
D. Less Amount Previously Received (Reimbursed by ADEQ):					\$555,240.55	
E. Amount of this Request (same as line 7 above unless it is the 1st Request):					\$22,095.09	

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 07/01/23 to 09/27/23 Request date: 10/02/23

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
PRINCIPAL/MANAGERIAL:						
07/27/23	98093	Christopher Sampognaro	CA-Data Analysis	2.00	\$62.23	\$124.46
08/24/23	98093	Michael Thompson	CA-Data Entry	1.00	\$41.58	\$41.58
08/21/23	98093	Michael Thompson	CA-Other	0.75	\$41.58	\$31.19
08/24/23	98093	Christopher Sampognaro	CA-Project Coordination	1.00	\$62.23	\$62.23
07/25/23	98093	Jared Saterfiel	CA-Project Mgmt	2.00	\$50.48	\$100.96
08/01/23	98093	Jared Saterfiel	CA-Project Mgmt	1.00	\$50.48	\$50.48
08/08/23	98093	Jared Saterfiel	CA-Project Mgmt	2.00	\$50.48	\$100.96
08/15/23	98093	Jared Saterfiel	CA-Project Mgmt	1.00	\$50.48	\$50.48
08/23/23	98093	Jared Saterfiel	CA-Project Mgmt	2.50	\$50.48	\$126.20
07/05/23	98093	Michael Thompson	CA-Quality Control	0.50	\$41.58	\$20.79
07/12/23	98093	Michael Thompson	CA-Quality Control	0.50	\$41.58	\$20.79
07/19/23	98093	Michael Thompson	CA-Quality Control	0.25	\$41.58	\$10.40
08/09/23	98093	Michael Thompson	CA-Quality Control	0.25	\$41.58	\$10.40
08/16/23	98093	Michael Thompson	CA-Quality Control	0.25	\$41.58	\$10.40
08/23/23	98093	Michael Thompson	CA-Quality Control	0.25	\$41.58	\$10.40
09/06/23	98093	Michael Thompson	CA-Quality Control	0.25	\$41.58	\$10.40
09/13/23	98093	Michael Thompson	CA-Quality Control	0.25	\$41.58	\$10.40
09/21/23	98093	Michael Thompson	CA-Quality Control	0.25	\$41.58	\$10.40
09/27/23	98093	Michael Thompson	CA-Quality Control	0.25	\$41.58	\$10.40
08/16/23	98093	Jonathan Roger	CA-Report Prep	1.00	\$41.58	\$41.58
09/26/23	98093	Michael Thompson	CA-Report Prep	1.00	\$41.58	\$41.58
07/10/23	98093	Jordan Harper	CA-Report Prep	5.00	\$32.67	\$163.35
07/11/23	98093	Jordan Harper	CA-Report Prep	2.00	\$32.67	\$65.34
07/27/23	98093	Jordan Harper	CA-Report Prep	2.00	\$32.67	\$65.34
09/08/23	98093	Jordan Harper	CA-Report Prep	4.00	\$32.67	\$130.68
09/11/23	98093	Jordan Harper	CA-Report Prep	3.00	\$32.67	\$98.01
09/14/23	98093	Jordan Harper	CA-Report Prep	0.50	\$32.67	\$16.34
09/20/23	98093	Jordan Harper	CA-Report Prep	1.00	\$32.67	\$32.67
09/21/23	98093	Jordan Harper	CA-Report Prep	1.00	\$32.67	\$32.67
09/22/23	98093	Jordan Harper	CA-Report Prep	2.00	\$32.67	\$65.34
09/25/23	98093	Jordan Harper	CA-Report Prep	1.50	\$32.67	\$49.01
09/26/23	98093	Jordan Harper	CA-Report Prep	1.00	\$0.00	\$0.00
ADDITIONAL PRINC/MGR COSTS (from the Extra Direct Labor Page):				9.00		\$483.51
TOTAL PRINCIPAL/MANAGERIAL:				50.25		\$2,098.69

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 07/01/23 to 09/27/23 Request date: 10/02/23

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
PROFESSIONAL/TECHNICAL:						
08/24/23	98093	Jeffrey Stamper	CA-Field Obs. Support	5.00	\$31.25	\$156.25
07/05/23	98093	Mark Coates	CA-Field Obs. Support	4.00	\$26.78	\$107.12
07/12/23	98093	Mark Coates	CA-Field Obs. Support	3.00	\$26.78	\$80.34
07/19/23	98093	Mark Coates	CA-Field Obs. Support	4.00	\$26.78	\$107.12
07/25/23	98093	Mark Coates	CA-Field Obs. Support	4.00	\$26.78	\$107.12
08/02/23	98093	Mark Coates	CA-Field Obs. Support	3.50	\$26.78	\$93.73
08/16/23	98093	Mark Coates	CA-Field Obs. Support	4.00	\$26.78	\$107.12
08/23/23	98093	Mark Coates	CA-Field Obs. Support	4.00	\$26.78	\$107.12
09/01/23	98093	Mark Coates	CA-Field Obs. Support	2.50	\$26.78	\$66.95
09/13/23	98093	Mark Coates	CA-Field Obs. Support	4.00	\$26.78	\$107.12
08/24/23	98093	Clifton Nelson	CA-Field Obs. Support	5.00	\$25.12	\$125.60
08/09/23	98093	Mark Coates	CA-Field Observation	4.00	\$26.78	\$107.12
08/24/23	98093	Jeffrey Stamper	CA-Field Prep	1.00	\$31.25	\$31.25
08/24/23	98093	Clifton Nelson	CA-Field Prep	1.00	\$25.12	\$25.12
08/25/23	98093	Clifton Nelson	CA-Field Prep	0.50	\$25.12	\$12.56
09/06/23	98093	Mark Howard	CA-O&M	5.00	\$31.84	\$159.20
09/21/23	98093	Mark Howard	CA-O&M	4.50	\$31.84	\$143.28
09/27/23	98093	Mark Howard	CA-O&M	4.00	\$31.84	\$127.36
09/06/23	98093	Mark Howard	CA-Travel	3.00	\$31.84	\$95.52
09/21/23	98093	Mark Howard	CA-Travel	3.50	\$31.84	\$111.44
09/27/23	98093	Mark Howard	CA-Travel	4.00	\$31.84	\$127.36
08/24/23	98093	Jeffrey Stamper	CA-Travel	3.00	\$31.25	\$93.75
07/05/23	98093	Mark Coates	CA-Travel	4.00	\$26.78	\$107.12
07/12/23	98093	Mark Coates	CA-Travel	2.00	\$26.78	\$53.56
07/19/23	98093	Mark Coates	CA-Travel	4.00	\$26.78	\$107.12
07/25/23	98093	Mark Coates	CA-Travel	4.00	\$26.78	\$107.12
08/02/23	98093	Mark Coates	CA-Travel	4.00	\$26.78	\$107.12
08/09/23	98093	Mark Coates	CA-Travel	4.00	\$26.78	\$107.12
08/16/23	98093	Mark Coates	CA-Travel	4.00	\$26.78	\$107.12
08/23/23	98093	Mark Coates	CA-Travel	4.00	\$26.78	\$107.12
09/01/23	98093	Mark Coates	CA-Travel	4.00	\$26.78	\$107.12
09/13/23	98093	Mark Coates	CA-Travel	4.00	\$26.78	\$107.12
ADDITIONAL PROF/TECH COSTS (from the Extra Direct Labor Page):				3.00		\$75.36
TOTAL PROFESSIONAL/TECHNICAL COSTS:				117.50		\$3,292.55

Interim Request No. 15 Page 6 of 16

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 07/01/23 to 09/27/23 Request date: 10/02/23

DIRECT LABOR COST DETAIL

DATE	INVOICE #	EMPLOYEE NAME	WORK PLAN TASK	HOURS	RATE	AMOUNT
SUPPORT:						
07/06/23	98093	Sarah Scott	CA-Data Entry	0.25	\$16.01	\$4.00
07/14/23	98093	Sarah Scott	CA-Data Entry	0.25	\$16.01	\$4.00
07/20/23	98093	Sarah Scott	CA-Data Entry	0.25	\$16.01	\$4.00
07/27/23	98093	Sarah Scott	CA-Data Entry	0.25	\$16.01	\$4.00
08/10/23	98093	Sarah Scott	CA-Data Entry	0.25	\$16.01	\$4.00
08/17/23	98093	Sarah Scott	CA-Data Entry	0.25	\$16.01	\$4.00
08/24/23	98093	Sarah Scott	CA-Data Entry	0.25	\$16.01	\$4.00
08/25/23	98093	Sarah Scott	CA-Data Entry	0.25	\$16.01	\$4.00
09/05/23	98093	Sarah Scott	CA-Data Entry	0.25	\$16.01	\$4.00
09/15/23	98093	Sarah Scott	CA-Data Entry	0.25	\$16.01	\$4.00
09/21/23	98093	Sarah Scott	CA-Data Entry	0.25	\$16.01	\$4.00
09/27/23	98093	Sarah Scott	CA-Data Entry	0.25	\$16.01	\$4.00
07/12/23	98093	Terry Montpelier	CA-Report Prep	0.50	\$20.88	\$10.44
07/13/23	98093	Terry Montpelier	CA-Report Prep	0.50	\$20.88	\$10.44
07/28/23	98093	Terry Montpelier	CA-Report Prep	1.00	\$20.88	\$20.88
						\$0.00
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ADDITIONAL SUPPORT GOSTS (from the Extra Direct Labor Page):						
TOTAL SUPPORT COSTS:				5.00		\$89.79
TOTAL DIRECT LABOR COSTS:				172.75		\$5,481.03

Interim Request No.	15	Page	9	of	16
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	07/01/23	to	09/27/23
					Request date: 10/02/23

FIXED RATE COSTS DETAIL

DATE	INVOICE#	ROUTE AND WORK PLAN TASK	# OF MILES	RATE	AMOUNT
MILEAGE:					
07/05/23	98093	CA-Mileage Monroe to Dermott to Monro	175.00	\$0.70	\$122.50
07/12/23	98093	CA-Mileage Monroe to Dermott	90.00	\$0.70	\$63.00
07/19/23	98093	CA-Mileage Monroe to Dermott to Monro	175.00	\$0.70	\$122.50
07/25/23	98093	CA-Mileage Monroe to Dermott to Monro	175.00	\$0.70	\$122.50
08/02/23	98093	CA-Mileage Monroe to Dermott to Monro	175.00	\$0.70	\$122.50
08/09/23	98093	CA-Mileage Monroe to Dermott to Monro	175.00	\$0.70	\$122.50
08/16/23	98093	CA-Mileage Monroe to Dermott to Monro	177.00	\$0.70	\$123.90
08/24/23	98093	CA-Mileage Monroe to Dermott to Monro	175.00	\$0.70	\$122.50
08/24/23	98093	CA-Mileage Monroe to Dermott to Monro	175.00	\$0.70	\$122.50
09/01/23	98093	CA-Mileage Monroe to Dermott to Monro	175.00	\$0.70	\$122.50
09/06/23	98093	CA-Mileage Monroe to Dermott to Monro	178.00	\$0.70	\$124.60
09/13/23	98093	CA-Mileage Monroe to Dermott to Monro	176.00	\$0.70	\$123.20
09/21/23	98093	CA-Mileage Monroe to Dermott to Monro	177.00	\$0.70	\$123.90
09/27/23	98093	CA-Mileage Monroe to Dermott to Monro	180.00	\$0.70	\$126.00
					\$0.00
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					\$0.00
ADDITIONAL MILEAGE COSTS (from the Extra Fixed Rate Costs page):					\$0.00
TOTAL MILEAGE COSTS:					\$1,664.60



Invoice

September 30, 2023
Invoice No: 98093

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 Facility # 2741800

Professional Services through September 30, 2023

Phase: CA Corrective Action

Professional Personnel

		Hours	Rate	Amount
Data Analysis/Compilation				
Sampognaro, Christopher	7/27/2023	2.00 ✓	186.69	373.38
Data Entry				
Sr. Project Director				
Thompson, Michael	8/24/2023	1.00 ✓	124.74	124.74
Administrative Asst. II				
Scott, Sarah	7/6/2023	.25 ✓	48.03	12.01
Scott, Sarah	7/14/2023	.25 ✓	48.03	12.01
Scott, Sarah	7/20/2023	.25 ✓	48.03	12.01
Scott, Sarah	7/27/2023	.25 ✓	48.03	12.01
Scott, Sarah	8/10/2023	.25 ✓	48.03	12.01
Scott, Sarah	8/17/2023	.25 ✓	48.03	12.01
Scott, Sarah	8/24/2023	.25 ✓	48.03	12.01
Scott, Sarah	8/25/2023	.25 ✓	48.03	12.01
Scott, Sarah	9/5/2023	.25 ✓	48.03	12.01
Scott, Sarah	9/15/2023	.25 ✓	48.03	12.01
Scott, Sarah	9/21/2023	.25 ✓	48.03	12.01
Scott, Sarah	9/27/2023	.25 ✓	48.03	12.01
Field Observation Support				
Sr. Geologist				
Stamper, Jeffrey	8/24/2023	5.00 ✓	93.75	468.75
low flow sampling				
Geologist V				
Coates, Mark	7/5/2023	4.00 ✓	80.34	321.36
Coates, Mark	7/12/2023	3.00 ✓	80.34	241.02
Coates, Mark	7/19/2023	4.00 ✓	80.34	321.36
Coates, Mark	7/25/2023	4.00 ✓	80.34	321.36
Coates, Mark	8/2/2023	3.50 ✓	80.34	281.19

Project	134931	Former Valero Corner Store No. 1800			Invoice	98093
	Coates, Mark	8/16/2023	4.00✓	80.34		321.36
	Coates, Mark	8/23/2023	4.00✓	80.34		321.36
	Coates, Mark	9/1/2023	2.50✓	80.34		200.85
	Coates, Mark	9/13/2023	4.00✓	80.34		321.36
	Sr. Toxicologists					
	Nelson, Clifton	8/24/2023	5.00✓	75.36		376.80
	Field Observation					
	Geologist V					
	Coates, Mark	8/9/2023	4.00✓	80.34		321.36
	Field Preparation					
	Sr. Geologist					
	Stamper, Jeffrey	8/24/2023	1.00✓	93.75		93.75
	gathered supplies; ice for sampling event					
	Sr. Toxicologists					
	Nelson, Clifton	8/24/2023	1.00✓	75.36		75.36
	Nelson, Clifton	8/25/2023	.50✓	75.36		37.68
	shipping samples and Low flow equipment					
	Operations & Maintenance					
	Sr. Geologist					
	Howard, Mark	9/6/2023	5.00✓	95.52		477.60
	Howard, Mark	9/21/2023	4.50✓	95.52		429.84
	Howard, Mark	9/27/2023	4.00✓	95.52		382.08
	Other					
	Sr. Project Director					
	Thompson, Michael	8/21/2023	.75✓	124.74		93.56
	iPAD setup / GW Labels					
	Project Coordination					
	Sampognaro, Christopher	8/24/2023	1.00✓	186.69		186.69
	Discuss field activities with field personnel and checking on low flow equipment					
	Project Management					
	Saterfiel, Jared	7/25/2023	2.00✓	151.44		302.88
	Saterfiel, Jared	8/1/2023	1.00✓	151.44		151.44
	Saterfiel, Jared	8/8/2023	2.00✓	151.44		302.88
	Saterfiel, Jared	8/15/2023	1.00✓	151.44		151.44
	Saterfiel, Jared	8/23/2023	2.50✓	151.44		378.60
	Quality Assurance/Quality Control					
	Sr. Project Director					
	Thompson, Michael	7/5/2023	.50✓	124.74		62.37
	Thompson, Michael	7/12/2023	.50✓	124.74		62.37
	Thompson, Michael	7/19/2023	.25✓	124.74		31.19
	Thompson, Michael	8/9/2023	.25✓	124.74		31.19
	Thompson, Michael	8/16/2023	.25✓	124.74		31.19
	Thompson, Michael	8/23/2023	.25✓	124.74		31.19
	Thompson, Michael	9/6/2023	.25✓	124.74		31.19
	Thompson, Michael	9/13/2023	.25✓	124.74		31.19
	Thompson, Michael	9/21/2023	.25✓	124.74		31.19
	Thompson, Michael	9/27/2023	.25✓	124.74		31.19
	Report Preparation					
	Sr. Project Director					
	Roger, Jonathan	8/16/2023	1.00✓	124.74		124.74
	Thompson, Michael	9/26/2023	1.00✓	124.74		124.74
	QM Report figure / tables					

Project	134931	Former Valero Corner Store No. 1800	Invoice	98093
Project Manager II				
Harper, Jordan	7/10/2023	5.00 ✓	98.01	490.05
Harper, Jordan	7/11/2023	2.00 ✓	98.01	196.02
Harper, Jordan	7/27/2023	2.00 ✓	98.01	196.02
Harper, Jordan	9/8/2023	4.00 ✓	98.01	392.04
Harper, Jordan	9/11/2023	3.00 ✓	98.01	294.03
Harper, Jordan	9/14/2023	.50 ✓	98.01	49.01
Harper, Jordan	9/20/2023	1.00 ✓	98.01	98.01
Harper, Jordan	9/21/2023	1.00 ✓	98.01	98.01
Harper, Jordan	9/22/2023	2.00 ✓	98.01	196.02
3rd quarter qm				
Harper, Jordan	9/25/2023	1.50 ✓	98.01	147.02
3rd quarter QM				
Harper, Jordan	9/26/2023	1.00 ✓	98.01	98.01
3rd quarter QM				
Harper, Jordan	9/27/2023	1.00 ✓	98.01	98.01
3rd quarter QM				
Sr. Admin. Support				
Montpelier, Terry	7/12/2023	.50 ✓	62.64	31.32
Montpelier, Terry	7/13/2023	.50 ✓	62.64	31.32
Montpelier, Terry	7/28/2023	1.00 ✓	62.64	62.64
Report Review				
Saterfiel, Jared	7/24/2023	2.00 ✓	151.44	302.88
Saterfiel, Jared	7/31/2023	2.00 ✓	151.44	302.88
Senior Review				
Sampognaro, Christopher	7/25/2023	1.00 ✓	186.69	186.69
Sampognaro, Christopher	7/27/2023	2.00 ✓	186.69	373.38
Sampognaro, Christopher	9/20/2023	1.00 ✓	186.69	186.69
TF narative review				
Travel				
Sr. Geologist				
Howard, Mark	9/6/2023	3.00 ✓	95.52	286.56
Howard, Mark	9/21/2023	3.50 ✓	95.52	334.32
Howard, Mark	9/27/2023	4.00 ✓	95.52	382.08
Stamper, Jeffrey	8/24/2023	3.00 ✓	93.75	281.25
travel to and from Circle K site in Dermott, AR				
Geologist V				
Coates, Mark	7/5/2023	4.00 ✓	80.34	321.36
Coates, Mark	7/12/2023	2.00 ✓	80.34	160.68
Coates, Mark	7/19/2023	4.00 ✓	80.34	321.36
Coates, Mark	7/25/2023	4.00 ✓	80.34	321.36
Coates, Mark	8/2/2023	4.00 ✓	80.34	321.36
Coates, Mark	8/9/2023	4.00 ✓	80.34	321.36
Coates, Mark	8/16/2023	4.00 ✓	80.34	321.36
Coates, Mark	8/23/2023	4.00 ✓	80.34	321.36
Coates, Mark	9/1/2023	4.00 ✓	80.34	321.36
Coates, Mark	9/13/2023	4.00 ✓	80.34	321.36
Sr. Toxicologists				
Nelson, Clifton	8/24/2023	3.00 ✓	75.36	226.08
Totals		172.75		16,541.17
Total Labor:				16,541.17

Subcontractors

Laboratory

7/5/2023	Waypoint Analytical Mississippi	85.00		
9/8/2023	Waypoint Analytical Mississippi	850.00		
9/19/2023	Waypoint Analytical Mississippi	85.00		
Total Subcontractors:			1.2 times	1,020.00
				1,224.00

Reimbursable Expenses

Other Direct

7/1/2023	City of Dermott	65.25		
8/11/2023	City of Dermott	65.25		
9/1/2023	MK Environmental, Inc.	125.00		
9/1/2023	MK Environmental, Inc.	125.00		
9/1/2023	MK Environmental, Inc.	125.00		
9/1/2023	MK Environmental, Inc.	125.00		
9/1/2023	MK Environmental, Inc.	125.00		
9/5/2023	MK Environmental, Inc.	907.64		
9/11/2023	City of Dermott	65.25		

Office Expenses

7/13/2023	FedEx	3.42		
8/31/2023	FedEx	72.62		

Total Reimbursables:			1.2 times	1,804.43	2,165.32
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Unit Billing

Mileage - Company Vehicle

7/5/2023	~175.0 Miles @ 0.70	122.50		
7/12/2023	~ 90.0 Miles @ 0.70	63.00		
7/19/2023	~ 175.0 Miles @ 0.70	122.50		
7/25/2023	~ 175.0 Miles @ 0.70	122.50		
8/2/2023	~ 175.0 Miles @ 0.70	122.50		
8/9/2023	~ 175.0 Miles @ 0.70	122.50		
8/16/2023	~ 177.0 Miles @ 0.70	123.90		
8/24/2023	~ 175.0 Miles @ 0.70	122.50		
8/24/2023	~ 175.0 Miles @ 0.70	122.50		
9/1/2023	~ 175.0 Miles @ 0.70	122.50		
9/6/2023	~ 178.0 Miles @ 0.70	124.60		
9/13/2023	~ 176.0 Miles @ 0.70	123.20		
9/21/2023	~ 177.0 Miles @ 0.70	123.90		
9/27/2023	~ 180.0 Miles @ 0.70	126.00		

Total Units:		1,664.60		1,664.60
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Contract Maximum Billing Limits

	Current	Prior	To-Date
Total Billings	21,595.09	109,540.93	131,136.02
Contract Maximum			322,533.04
Remaining			191,397.02

Total this Phase: \$21,595.09

Phase: TFAP Trust Fund Application Preparation

Additional Fees

Trust Fund Application Preparation Fee	500.00		
Total Additional Fees:	500.00		500.00

Project	134931	Former Valero Corner Store No. 1800	Invoice	98093
			Total this Phase:	\$500.00
			Total this Invoice:	\$22,095.09

All invoices are due upon receipt.

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



ARKANSAS

ENERGY & ENVIRONMENT

MEMORANDUM

Matthew McGree 2/27/24

To: Jacqueline Trotta, Trust Fund Administrator
Assessment & Remediation Program, Office of Land Resources

Through: Blake Whittle, P.G., Groundwater Branch Manager *BW 2/27/24*
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 #15
For Time Period: 7/1/23 – 9/27/23
Amount Requested: \$22,095.09
[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^{1/2} 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 4th 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 3rd and 4th 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.

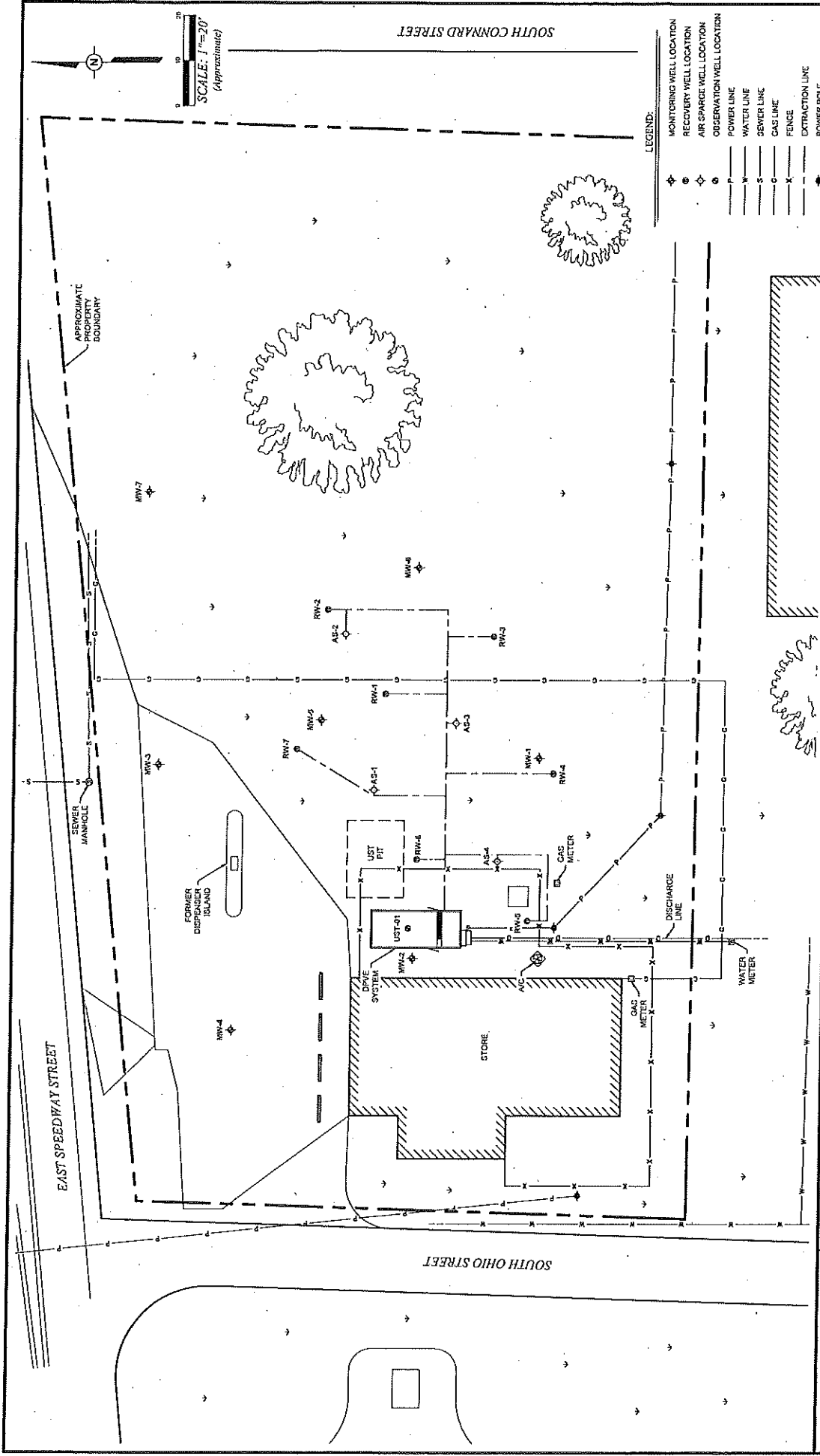
PPM collected system 3rd Quarter effluent DMR samples for TPH-G, BTEX during the routine September 13, 2023, O&M visit and collected 4th Quarter effluent DMR samples during the routine December 20, 2023, O&M visit.

The 1st Quarter 2023 groundwater sampling event was conducted on February 15, 2023. The 2nd 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.

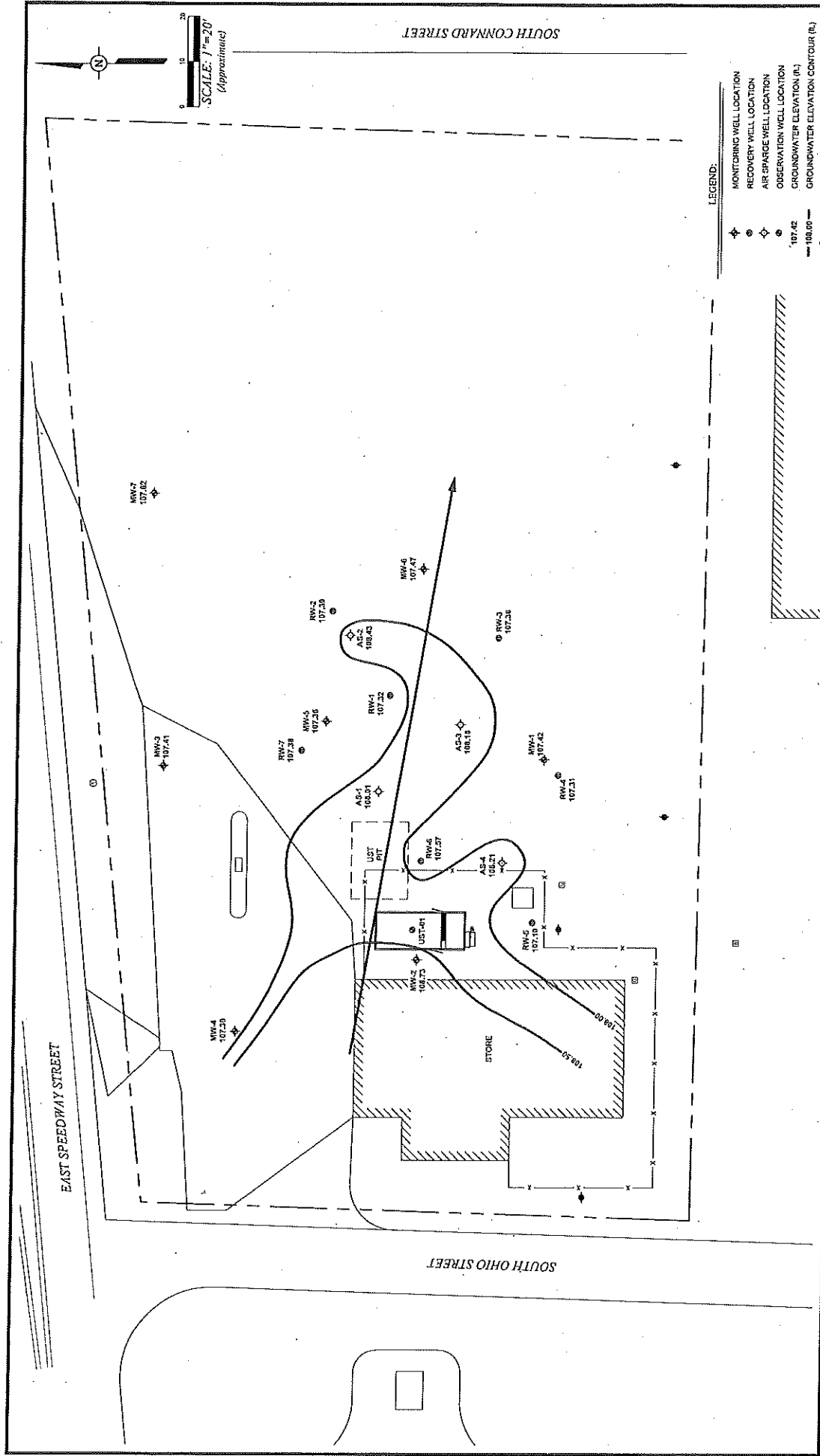
The 3rd Quarter 2023 Operations and Maintenance/Monitoring Report covering the period from July through September 2023 was issued to ADEQ on October 31, 2023. The 4th Quarter 2023 Operations and Maintenance/Monitoring Report covering the period from October through December 2023 was issued to ADEQ on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

Based on groundwater gauging measurement collected during the 3rd and 4th 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.

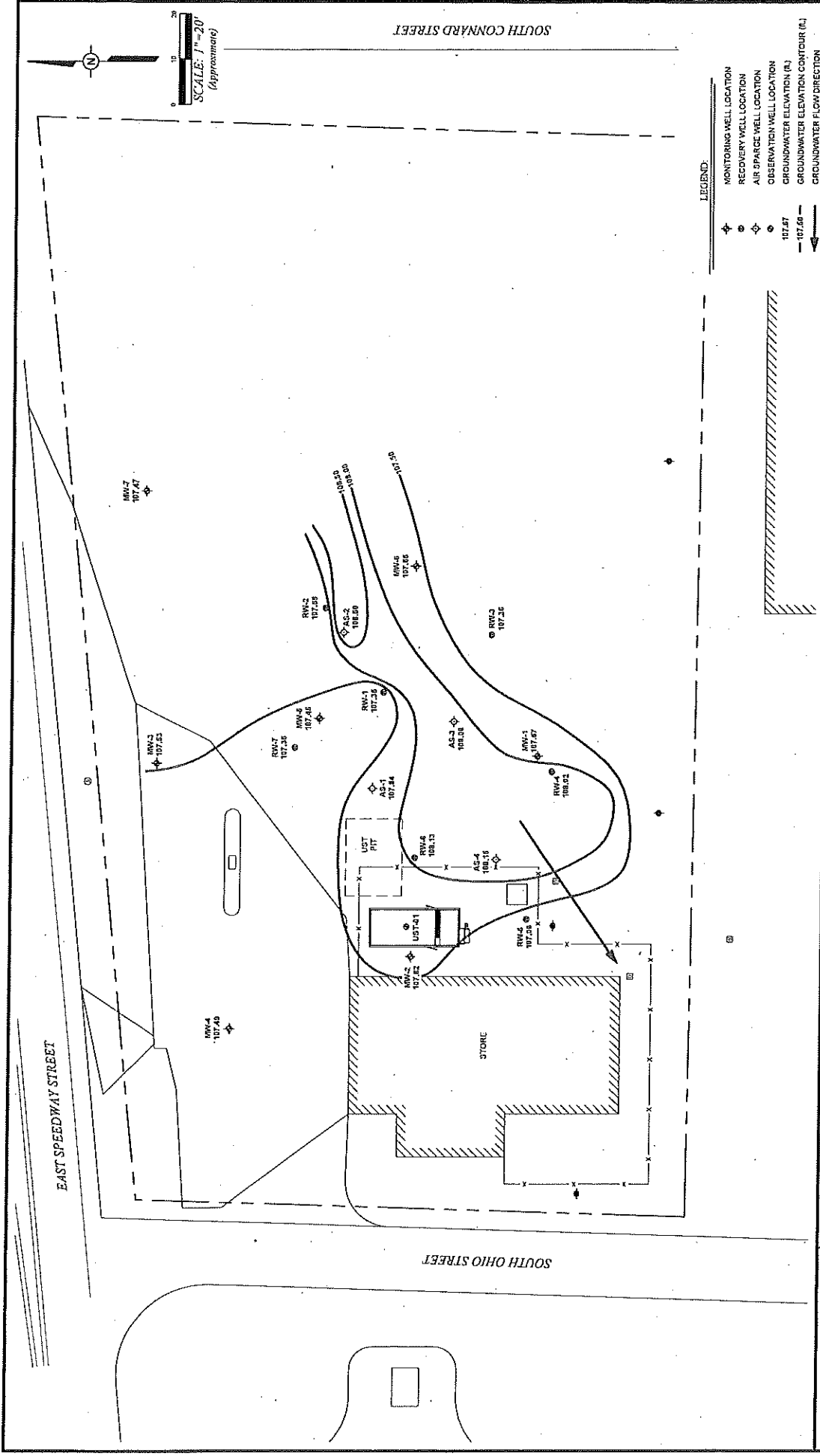
- Dissolved Benzene concentrations ranged from <0.001 milligrams per liter (mg/L) to 0.474 mg/L.
- Dissolved Toluene concentrations ranged from <0.002 mg/L to 0.142 mg/L.
- Dissolved Ethylbenzene concentrations ranged from <0.001 mg/L to 0.121 mg/L.
- Dissolved Xylenes concentrations ranged from <0.001 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.



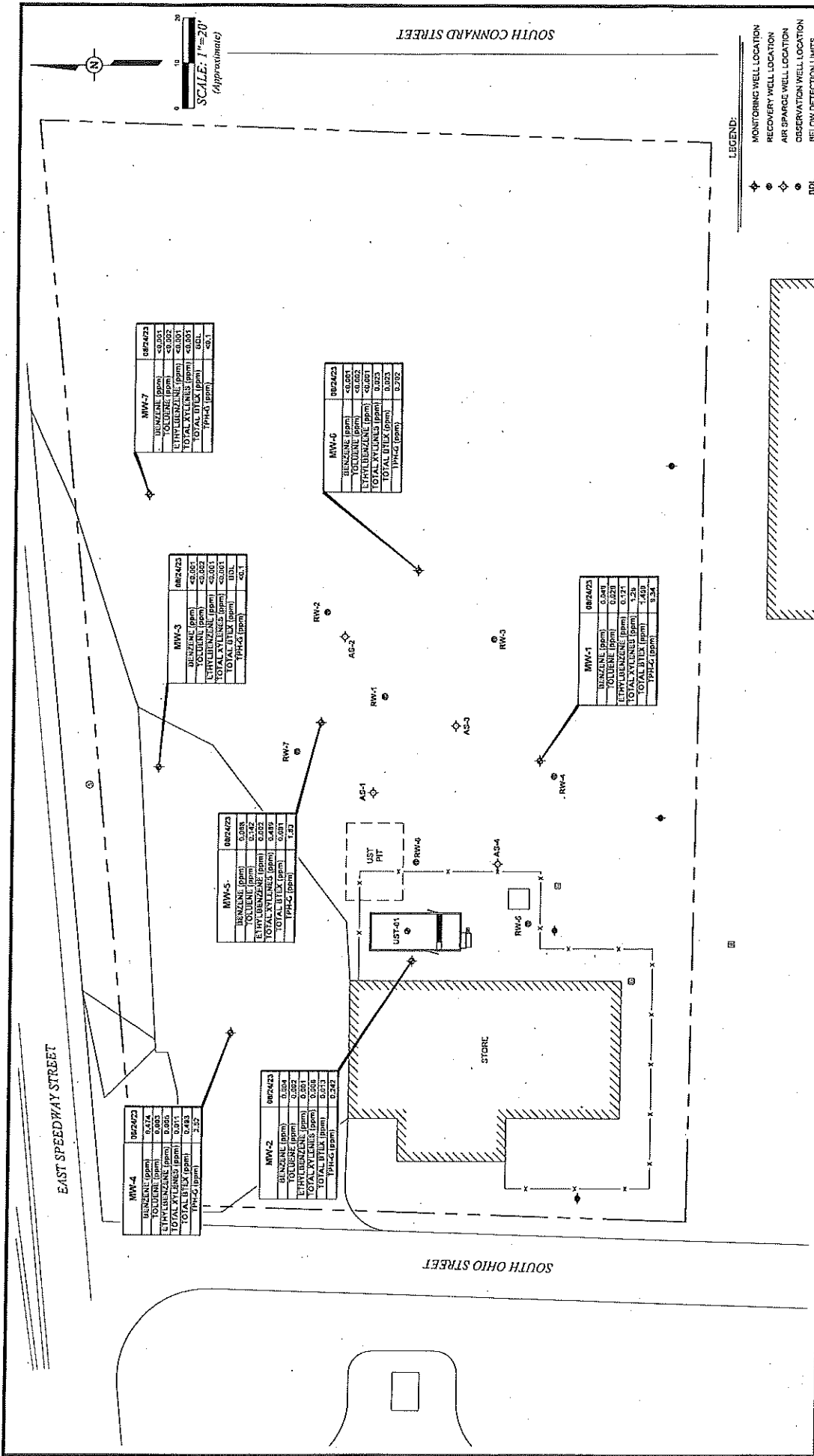
<p>PPA P.P.A. CONSULTANTS, INC. www.ppa.com</p>		<p>DRAWN BY: BWH PROJECT NUMBER: 134931</p>	<p>DATE: 10/13/23 PHASE: RP</p>
<p>CIRCLE K STORES INC FORMER VALERO CORNER STORE NO. 1800 301 EAST SPEEDWAY STREET DERMOTT, ARKANSAS</p>		<p>SITE MAP</p>	
<p>FIGURE NUMBER</p>		<p>1</p>	



PPM CONSULTANTS, INC. www.ppm.com		DRAWN BY: BWH PROJECT NUMBER: 134931	
DATE: 10/13/23 PAGE: RP		CIRCLE K STORES, INC. FORMER VALERO CORNER STORE NO. 1800 301 EAST SPEEDWAY STREET DERMOTT, ARKANSAS	
POTENTIOMETRIC SURFACE MAP 3RD QUARTER 2023 (AUGUST 24, 2023)		SHEET NUMBER 2	



PBA CONSULTANTS, INC. www.pba.com		CIRCLE K STORES, INC. FORMER VALERO CORNER STORE NO. 1800 301 EAST SPEEDWAY STREET DERMOTT, ARKANSAS		POTENTIOMETRIC SURFACE MAP 4TH QUARTER 2023 (NOVEMBER 15, 2023)	FIGURE NUMBER 2
DRAWN BY: JCP	CHECKED BY: JCP	DRAWN DATE: 07/09/24	CHECKED DATE: 07/09/24		
PROJECT NUMBER: 134931	PHASE: RP				



MW-7		08/24/23	
BENZENE (ppm)	<0.003	TOLUENE (ppm)	<0.003
ETHYLBENZENE (ppm)	<0.003	STYRENE (ppm)	<0.003
TOTAL XYLENES (ppm)	<0.003	TOTAL BTEX (ppm)	<0.003
PHAS (ppm)	<0.1		

MW-6		08/24/23	
BENZENE (ppm)	<0.003	TOLUENE (ppm)	<0.003
ETHYLBENZENE (ppm)	<0.003	STYRENE (ppm)	<0.003
TOTAL XYLENES (ppm)	0.025	TOTAL BTEX (ppm)	0.025
PHAS (ppm)	0.232		

MW-3		08/24/23	
BENZENE (ppm)	<0.003	TOLUENE (ppm)	<0.003
ETHYLBENZENE (ppm)	<0.003	STYRENE (ppm)	<0.003
TOTAL XYLENES (ppm)	0.003	TOTAL BTEX (ppm)	0.003
PHAS (ppm)	<0.1		

MW-1		08/24/23	
BENZENE (ppm)	0.048	TOLUENE (ppm)	0.021
ETHYLBENZENE (ppm)	0.171	STYRENE (ppm)	0.025
TOTAL XYLENES (ppm)	1.25	TOTAL BTEX (ppm)	1.469
PHAS (ppm)	0.34		

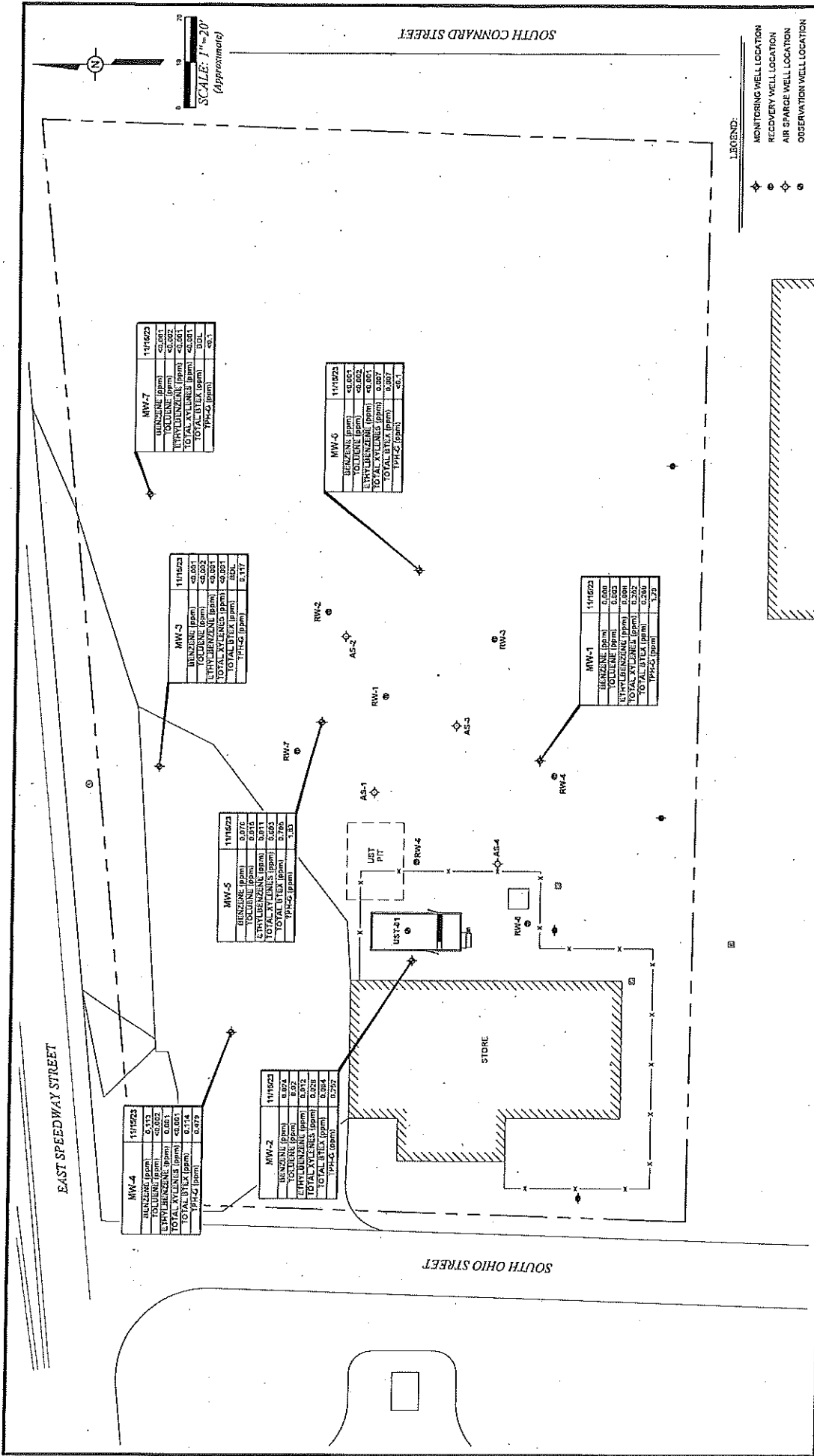
MW-5		08/24/23	
BENZENE (ppm)	0.018	TOLUENE (ppm)	0.142
ETHYLBENZENE (ppm)	0.022	STYRENE (ppm)	0.489
TOTAL XYLENES (ppm)	0.011	TOTAL BTEX (ppm)	0.631
PHAS (ppm)	1.53		

MW-2		08/24/23	
BENZENE (ppm)	0.004	TOLUENE (ppm)	0.022
ETHYLBENZENE (ppm)	0.022	STYRENE (ppm)	0.008
TOTAL XYLENES (ppm)	0.008	TOTAL BTEX (ppm)	0.013
PHAS (ppm)	0.242		

LEGEND:

- MONITORING WELL LOCATION
- RECOVERY WELL LOCATION
- AIR SPARGE WELL LOCATION
- OBSERVATION WELL LOCATION
- BDL

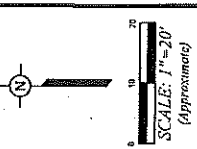
PPM CONSULTANTS, INC. <small>AN ISO 9001 CERTIFIED COMPANY</small>		CIRCLE K STORES, INC. FORMER VALERO CORNER STORE NO. 1800 301 EAST SPEEDWAY STREET DERMOTT, ARKANSAS	
DRAWN BY: BWH PROJECT NUMBER: 134931	DRAWN DATE: 10/13/23 PHASE: RP	DISSOLVED COC CONCENTRATIONS IN GROUNDWATER 3RD QUARTER 2023 (AUGUST 24, 2023)	
FIGURE NUMBER: 3			



EAST SPEEDWAY STREET

SOUTH OHIO STREET

SOUTH CONNARD STREET



PPAI CONSULTANTS, INC. <small>MEMBER OF THE PERKINS+WILL GROUP</small>	DRAWN BY: JCP PROJECT NUMBER: 134931	DRAWN DATE: 01/09/24 PHASE: RP	CIRCLE K STORES, INC. FORMER VALERO CORNER STORE NO. 1800 301 EAST SPEEDWAY STREET DERMOTT, ARKANSAS	DISSOLVED COC CONCENTRATIONS IN GROUNDWATER 4TH QUARTER 2023 (NOVEMBER 15, 2023)	FIGURE NUMBER 3
	EAST SPEEDWAY STREET				