The background is a light blue gradient with several realistic water droplets of various sizes scattered across it. The droplets have highlights and shadows, giving them a three-dimensional appearance.

CIRCLE K: LEAKING PETROLEUM STORAGE TANK

CITY OF PLANO ENVIRONMENTAL QUALITY

INITIAL INSPECTION

- On 1/2/2020, the Inspector observed a pungent-smelling discharge with an orange substance (possible iron reducing bacteria) settled on the concrete during a routine dry-weather inspection.
- Water color was clear, water sample was collected, and the following parameters were assessed:



pH	8
D.O.	8.4 mg/l
Conductivity	792 uS/cm
Temperature	16.2°C
Combined Chlorine	0.12 mg/l
Ammonia	0.70 mg/l
Iron	0.24 mg/l
Chelated Copper	0.06 mg/l
Nitrate	6 mg/l
Phosphate	0.21 mg/l

NEXT DAY 1/3/2020

- A sample was taken to PACE Analytical to test for Total Petroleum Hydrocarbons (TPH) and Benzene, Toluene, Ethylbenzene, and Xylene (BTEX).
- Inspector observed that a Circle K gas station was nearby and drained to the same storm drain line. Circle K had recently replaced their pumps and were assessing for need to replace tanks.
- Manager was called and left a voicemail regarding recent work done at Circle K. We asked for recent tanks tests to be provided.



INVESTIGATION WITH CIRCLE K

- 1/6/2020: Inspector spoke with manager of Circle K and confirmed no work had been done on the Underground Storage Tank (UST).
- Inspection of the UST was scheduled.
- Sample results for TPH and BTEX at outfall:

TPH	Non-detect (ND)
Benzene	0.019
Toluene	ND
Ethylbenzene	0.011
Xylene	0.012

* 0.005 mg/l is the surface water, default groundwater, and drinking water standard for Benzene.



CIRCLE K RESPONSE

- After receiving BTEX results, Circle K was requested to provide immediate response to the discharge and report the release to TCEQ.
- 1/7/2020: Plano EQ spoke with Circle K Environmental Response team and actions included:
 - Addition of absorbent booms at the outfall
 - Petroleum line test and tank test scheduled
 - Drilling of monitoring wells for groundwater
 - TCEQ Petroleum Storage Team notified



ACTIONS: 1/10/2020 – 4/6/2020

1/10/2020

Met with TCEQ and tank tester on site. TCEQ tested storm inlets and outfall for LEL levels. Inlets 0%, outfall 4%.



1/21/2020

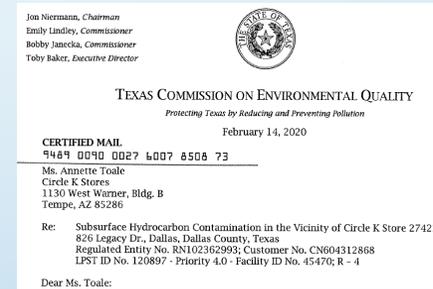
Environmental contractor to send updates on findings to Plano EQ. System is tight according to them. Strong odor still emanating from outfall. Conference call set up to continue source determination.

1/31/2020

Conference call with Circle K and contractor Pure Environmental. Waiting to hear from TCEQ. Attempting to schedule a TV of the storm drain line with Plano Public Works.

3/26/2020

Pure Environmental Solutions in process of completing site assessment for Circle K. Groundwater wells dug for sampling. Finally determined this is the source.



1/13/2020

Tank test shows all 3 USTs pass criteria as tight on liquid currently. Waiting on next step from Circle K.

1/28/2020

TCEQ Petroleum Storage Team sent lab results and UST System test results to TCEQ Remediation Division for assessment.

2/14/2020

TCEQ Remediation Division sent letter to Circle K requiring an environmental site assessment be conducted by 5/14/2020.

4/6/2020

Both Plano Public Works and Pure Environmental have TV'd the storm drain line and found a break where repairs need to be made by the City to prevent contaminated groundwater intrusion.

TCEQ ACTIONS

- COVID complications slowed things down on all ends.
- On 6/19/2020, TCEQ Remediation Division sent a letter officially identifying Circle K as the responsible party and requiring corrective actions for the release including:
 - Provide a risk-based assessment before 8/18/2020
 - Immediately abate any release of a regulated substance.
 - Investigate for soil and groundwater cleanup

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 19, 2020

CERTIFIED MAIL

9489 0090 0027 6002 9571 02

Mr. Allan Cubberley
Circle K Stores, Inc.
1130 West Warner, Bldg. B
Tempe, AZ 85286

Re: Leaking Petroleum Storage Tank (LPST) ID Number Assignment and Corrective Action Requirements for Circle K Store 2742372, 826 Legacy Dr., Plano, Collin County, Texas
Regulated Entity No. RN102362993; Customer No. CN604312868
LPST ID No. 120897; Priority 4.0; PST Facility ID No. 45470; R-4

Dear Mr. Cubberley:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the Release Determination Report submitted on May 5, 2020 and has determined that a release occurred at the above-referenced facility. **The LPST ID No. 120897 has been assigned to your case and should be included on all future correspondence.**

Owners and/or operators of storage tank systems are required to immediately abate any release of a regulated substance and to conduct an investigation for soil and groundwater cleanup according to Title 30, Texas Administrative Code (TAC), Section 334.71-334.85. We request that Circle K contact an environmental consulting firm registered as a Corrective Action Specialist (CAS) and knowledgeable in hydrogeology and contaminant assessment to discuss investigation requirements at your facility.

Circle K Stores, Inc. is the owner/operator of the storage tank system and is required to provide a risk-based assessment to the TCEQ in an *Assessment Report Form* (ARF) before August 18, 2020. Please provide one paper copy and one complete, identical electronic copy (on USB or disc) of all submittals. A Correspondence ID Form (TCEQ Form 20428) must accompany each document submitted to the Remediation Division and should be affixed to the front of your submittal.

STORM DRAIN LINE REPAIR

- Plano Public Works worked on identifying exact line break location for simpler repair process.
- Line repaired on 7/21/2020



WHAT'S NEXT?

- Circle K to comply with TCEQ risk assessment order.
- We will continue to monitor the outfall and compliance.
- Outfall has cleared up regarding orange substance and odor.



QUESTIONS?

