

**FORBES
ENVIRONMENTAL
ENGINEERING & ASSOCIATES**

MEMORANDUM

11839 Parliament St., 813
San Antonio, Texas 78216
(210)377-2340

TO: Texas Commission of Environmental Quality
PST Division – RPR Section MC-137
P.O. Box 13087
Austin, Texas 78711-3087

DATE: June 29, 2005

CC: TCEQ Region 11 Office
Mr. Kirk Brumley, Sac-N-Pac Stores, Inc.

FROM: Stephen Forbes, P.E., P.G., CAPM

SUBJECT: Well Plugging
Sac-N-Pac Store #506; LPST 116472; Facility No. 47684
1424 Highway 46, New Braunfels, Comal County, Texas
TNRCC Region 11

As instructed by the TCEQ in its Case Closure letter dated September 18, 2003, monitor wells MW-1 was plugged at the above referenced Sac-N-Pac facility. This activity was conducted in accordance with the TCEQ preapproval granted May 9, 2005. The wells were plugged on June 14, 2005 by a licensed Texas well driller in accordance with 30 TAC 338.49(b) (pertaining to Standards for Plugging Wells).

As per TCEQ instructions the State of Texas Plugging Report (TDLR a004WWD) is being submitted to the Water Well Drillers Section of the Texas Department of Licensing and Regulation.

It is understood that this is the last submittal associated with this case, all corrective action associated with this release has been completed, and there will be no subsequent TCEQ correspondence in response to this memorandum.

Thank you for your time and assistance.

Sincerely Yours,



Stephen Forbes, P.E., P.G. CAPM00867

DARCY ENVIRONMENTAL GROUP
JUL 06 2005

Received
JUL 05 2005
TCEQ/PST-RPR

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Texas Department of License and Regulation

Water Well Driller/Pump Installer Program
 P.O. Box 12157 Austin, Texas 78711 (512)463-7880 FAX (512)463-8616
 Email address: water.well@license.state.tx.us

This form must be completed
 and filed with the department
 within 30 days following the
 plugging of the well.

PLUGGING REPORT

PAGE 1 OF 1

For: Forbes Environmental

A. WELL IDENTIFICATION AND LOCATION DATA

1) OWNER

Name	Address	City	State	Zip
SAC-N-PAC #506	1424 HWY 46	NEW BRAUNFELS	TX	78132

2) WELL LOCATION

County	Physical Address	City	State	Zip
GUADALUPE	1424 HWY 46	NEW BRAUNFELS	TX	78132

3) Owner's Well No.	Long.	Lat.	Grid #
1			68-24-9

4) Type of Well	<input type="checkbox"/> Water	<input checked="" type="checkbox"/> Monitor	<input type="checkbox"/> Injection	<input type="checkbox"/> De-Watering
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Drill, Pump Installer, or Landowner performing the plugging operations must locate and identify the location of the well within a specific grid on a full scale gridded map available from Texas Natural Resource Information Service. The location of the well should be denoted within the grid by placing a corresponding dot in the square to the right. The legal description is optional.

B) HISTORICAL DATA ON WELL TO BE PLUGGED (if available)

6) Driller	License No.	5) N↑
JOHN E. TALBOT	3180M	
7) Drilled 12/23/2004	8) Diameter of hole 8 inches	9) Total depth of well 45 feet

C. CURRENT PLUGGING DATA

10) Date well plugged	11) REMOVE ALL REMOVEABLE CASING
06/14/2005	Please check box beside the method of plugging used
12) Name of Driller/Pump Installer or Well Owner performing the plugging	<input type="checkbox"/> Tremmie pipe cement from bottom to top.
JAMES E. NEAL	<input type="checkbox"/> Tremmie pipe bentonite from bottom to 2 feet from surface, cement top 2 feet.

License No. 4868WPKT

13) CASING AND CEMENTING DATA RELATIVE TO THE PLUGGING OPERATIONS

CASING LEFT IN WELL

DIAMETER (inches)	FROM (feet)	TO (feet)
2	0	

☒ Pour in 3/8 bentonite chips when standing water in well is less than 100 feet in depth, cement top 2 feet.

☐ Large diameter well filled with clay material from top to bottom.

CEMENT/BENTONITE PLUG(S) PLACED IN WELL

FROM (feet)	TO (feet)	SACKS
Super 2	2	2
2	45	3

COMMENTS

CEMENT
 BENTONITE

D. VALIDATION OF INFORMATION INCLUDED IN FORM

I certify that I plugged this well (or the well was plugged under my supervision) and that all of the statements herein are true and correct. I understand that failure to complete items 1 through 13 will result in the report(s) being returned for completion and resubmitted.

Company or Individual's Name (type or print)	VORTEX DRILLING INC.			
Address	4412 BLUEMEL ROAD	City	SAN ANTONIO	State TEXAS Zip 78240
Signature	06/14/2005	Signature	/	/
Licensed Driller/Pump Installer	Date	Apprentice	Date	

UPST#116472

7003 3110 0003 0833 9416

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
TH2004 UPS 11/12/05	
Postage \$	5/9/05 Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Sent To: Kerr Brunkey Street, Apt. No. or PO Box: 1105 United Dr Ste 115 City, State, ZIP+4: SAN MARCOS TX 78666	
PS Form 3800, June 2002	

facsimile transmittal

To: Helen Welch

Fax: 239-2216

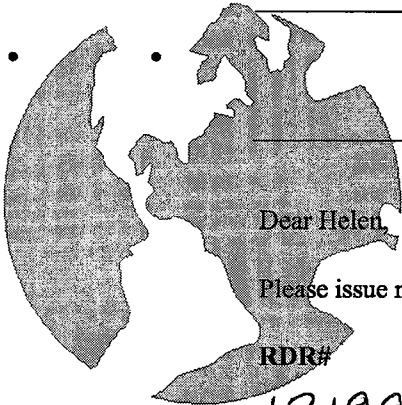
From: ~~Debra~~ ext 21 or Jan ext 34

Date: 2/24/05

Re: New LPSTs #

Pages: 1

CC:



Dear Helen,

Please issue new LPST numbers for the following:

RDR#

13199

FAC#

09133

Thanks, Debra & Jan

CONFIDENTIAL

Kathleen Hartnett White, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Larry R. Soward, *Commissioner*
Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 9, 2005

Mr. Kirk Brumley
Sac-N-Pac Stores, Inc.
1405 United Dr., Ste. 115
San Marcos, TX 78666

CERTIFIED MAIL#
7003 3110 0003 0833 9416
RETURN RECEIPT REQUESTED

Re: Leaking Petroleum Storage Tank (LPST) ID Number Assignment and Comments to Sac-N-Pac No. 506, 1424 Hwy. 46, New Braunfels (Comal County), Texas
(LPST ID No. 116472; Facility ID No. 47684; RDR ID 14256); R-13

Dear Mr. Brumley:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the completed Texas Risk Reduction Program (TRRP) screening process data submitted for release determination purposes at the above-referenced site. Based on the presence of benzene above Petroleum Storage Tank (PST) Program action levels for soil, this office has determined that a release has occurred and therefore has assigned leaking petroleum storage tank (LPST) number 116472 to the facility.

The data submitted indicate that groundwater contaminant concentrations at this site do not exceed the action levels and that soils leaching to groundwater is not a concern, based on the confirmation soil samples collected. Based upon the submitted information and with the provision that the documentation provided to this agency is accurate and representative of site conditions, we conclude that the site now meets closure requirements. **Therefore, no further corrective action under the TRRP rule is necessary.**

Please note that if monitor wells are present but are not in use and/or will not be used in the next 180 days, they must be properly plugged and abandoned pursuant to Chapter 32.017 of the Texas Water Code and in accordance with Title 16, Texas Administrative Code (TAC), Section 76.1004. A *State of Texas Plugging Report* (TDLR a004WWD) is required to be submitted to the Water Well Drillers Section of the Texas Department of Licensing and Regulation, P.O. Box 12157, Capitol Station, Austin, Texas 78711, within thirty (30) days of plugging completion. If you have any questions regarding the future use of an existing monitor well, please contact the Texas Department of Licensing and Regulation at 512/463-7880 or 800/803-9202.

Please note that any underground or above-ground storage tanks remaining at this site continue to be subject to TCEQ tank registration, self-certification, financial assurance and technical standards provisions.

Should you have any questions, please contact Ms. Trudy Hasan of Darcy Environmental Group (PST Privatization Contractor) at 512/342-8585, extension 24, and reference the assigned LPST ID Number. We appreciate your cooperation.

FORM INSTRUCTIONS: Use this form to report suspected/confirmed PST releases to the Texas Commission on Environmental Quality (TCEQ) PST - Responsible Party Remediation Section - 512/239-2200 (phone), 512/239-2216, postpr@tceq.state.tx.us (e-mail). All suspected/confirmed releases **must be reported w/in 24 hours** of discovery. For emergencies only, call 512/239-2120 or after regular business hours, page 512/606-9197.

Facility Information

Facility Name: Sac-N-Pac No. 506
Address: 1424 Hwy. 46
City: New Braunfels County: Comal
Facility ID: 47684 'ghost' tank Pre-existing LPST ID: ☐ N/A ☐ Unk

Responsible Party (RP) Information

Contact Person: Mr. Kirk Brumley Phone: 512/ 392-6484
Company: Sac-N-Pac Stores, Inc. Fax: 512/ 392-6333
Address: 1405 United Dr., Ste. 115
City: San Marcos State/Zip: TX 78666

Release reported by:
(if different from above)

Contact Person: _____ Phone: _____
 Company: _____
 Address: _____
 City: _____ State/Zip: _____

The RP is the:

☒ tank owner ☐ tank operator ☐ land owner ☐ other (specify):

Release Information

Release is: ☒ Confirmed ☐ Suspected Date of discovery: 11/18/04

Check all that apply:

Discovery

- ☒ Routine tank closure or site assessment
- ☒ Laboratory analytical results
- ☐ Free product or sheen
- ☐ Odors
- ☐ Automatic tank gauge
- ☐ Probe or sensor
- ☐ Inventory records
- ☐ 1-mo. SIR failure or 'inconclusive'
- ☐ 2-mo. inventory control discrepancy
- ☐ Tank tightness test failure
- ☐ Line tightness test failure
- ☐ Groundwater monitoring well
- ☐ Vapor detector (auto or manual)
- ☐ Water supply contamination

Substance

- X Gasoline (Leaded/Non-leaded/Unknown)**
☐ Diesel/Fuel oil
☐ Waste oil
☐ Hydraulic/transmission/mineral oil
☐ Jet fuel/kerosene
☐ Petroleum - unknown type
☐ Hazardous substance: _____
☐ Unknown
☐ Other (describe): _____

Impact

- ☐ Groundwater
☐ Surface water
☒ Soil
☐ Air

Cause

- ☐ Spill
☐ Overfill
☐ Human error
☐ Faulty installation
☐ Corrosion
☒ Unknown
☐ Other (describe):

Location

- ☐ Tankhold
☒ Dispenser area
☒ Pipe chase
☐ Remote fill port
☐ Other (describe):

Tank system has/had: ☐ pressurized piping ☐ suction piping ☒ unknown ☐ N/A

Other parties notified (Fire, police, etc. - list):

Free product present? ☐ Yes ☐ No Describe steps taken to control and abate release (system repairs, free product removal, etc.), and/or actions taken to mitigate any fire, explosion, or vapor hazard:

Additional comments (add pages as needed):

RDR ID 14256

DB2 TH2

350 Release LADnoAPAR

<<< TCEQ USE ONLY >>> PM - complete this form when a report of a suspected/confirmed release from a regulated storage tank is received & provided to Admin staff. Information received by ☐ phone ☐ fax ☐ e-mail (print out & attach) ☐ other (explain on additional pages or on back).

Date release was reported to TCEQ: 11/19/04 Initial here if new LPST ID No. should be assigned: DB2 PM 400 TL

New LPST ID# _____ **Admin - fax completed form to RP & enter into appropriate databases. Info entered in** ☐ RDR Db ☐ SMAPS

on _____ (date) by _____ (Initials). Faxed to RP on _____ (date).

RDR REVIEW CHECKLIST - SITES POST 11/2003

FAC ID/RDR No.: 47684 1 14256 Or "ghost" (unregistered) tank: <input type="checkbox"/> Y	Product(s) stored (check all that apply): <input type="checkbox"/> gasoline <input type="checkbox"/> diesel <input type="checkbox"/> waste oil Other _____
Facility Name & Address: Sac - N-Pac No 506 1424 Hwy. 46 County, TCEQ Region: New Braunfels (Comal) R-13	Tank system <input type="checkbox"/> Removed 11/09/04 through Jan 7, 05 <input type="checkbox"/> Still active <input type="checkbox"/> Abandoned in place _____ <input type="checkbox"/> MSA - Real Estate Inv _____

Pre-existing LPST ID No.? Y _____ ☐ N Date opened: _____ Priority: _____ Date closed: _____

Comments: piping & disp. replaced - VSTs remain. 1 sample 7 achis - 4 borings & MW installed; ~~also~~ cont. sampled < action level, so no samples to get SPLP on.

Checklist - Required Items	Y	N	n/a
Site Info			
Site map has scale, North arrow, street address	✓		
Complete PST layout shown (tanks, piping, dispensers)*	✓		
Sampling, boring, well locations shown w/ID #s	✓		
Field Activities/Sample Collection			
Tank pit - under ea. tank + sidewalls?	✓		✓
Dispensers sampled*	✓		
Pipe chases sampled ~1/20 ft*	✓		
Grab samples only collected, not composite	✓		
Water present in tank pit sampled	✓		✓
Backfill sampled	✓		
Descrip. of sample collection/handling methods	✓		
Photographs	✓		
Samples submitted to lab w/in <u>1</u> hrs <u> </u> days (24-48 hrs) of collection			
Person from Regional office present at removal			
Analytical			
Gas/Diesel <input type="checkbox"/> BTEX <input type="checkbox"/> MTBE <input type="checkbox"/> TPH <input type="checkbox"/> PAH on highest TPH >MDLs			
Waste Oil <input type="checkbox"/> VOCs <input type="checkbox"/> TPH <input type="checkbox"/> PAH TPH >MDLs			
Hydraulic <input type="checkbox"/> TPH <input type="checkbox"/> PAH on high TPH			
If Other - correct analyses run?			

Checklist - Required Items <small>con't</small>	Y	N	n/a
COCs, site map, and lab reports match, & signatures, dates, and times, filled in	✓		
Sample condition upon arrival at lab was 4°C±2	14-80		
Lab reports incl. QA/QC section, signed & #d	✓		
Holding times were met	✓		
SQLs low enough for comparison to action/screening levels	✓		
Waste disposal			
Disposal manifests signed by receiving fac.			
If no waste generated ((borehole cuttings, excavated soils, etc.), statement to that effect			
Backfill put back _____ disposed offsite _____			
Waste amts. match (RDR report v. manifest) _____ gal liquid _____ yds ³ solids			
Misc. Documentation/Descriptions			
CAS / LOSS signature on RDR signature page	✓		
Construction notification form	✓		
Tank/piping destruction 'certificate'			✓
Amended TCEQ Tank Registr. form attached	✓		
No. of tanks match Registration database?	✓		
Misc. TRRP Screening			
Tier 1 Eco Checklist included if COC>MQL			
MW(s) installed, sampled, <action levels			
Excavation conducted?			
<15' Soil (Remaining)< ^{Total} Soil _{Comb} B-32, B(a)P-7.6			
SPLP conducted on soil			

Site Data:

Soil	Benzene	Toluene	Ethylbenzene	Xylenes	MTBE	TPH C ₁₂ -C ₂₈	PAH
action level	0.026	8.200	7.600	120.000	0.62	>MDL	B(a)P 0.56; rest >1ppm
Site Conc	1.947	1.357	1.334	6.356	0.177	<	
Tank Water	Benzene	Toluene	Ethylbenzene	Xylenes	MTBE	TPH C ₁₂ -C ₂₈	PAH
action level	0.005	1.000	0.700	10.000	0.240	>MDL	B(a)P 0.0002 ppm rest >0.4 ppm
Site Conc							
GW	Benzene	Toluene	Ethylbenzene	Xylenes	MTBE	TPH C ₁₂ -C ₂₈	PAH
action level	0.005	1.000	0.700	10.000	0.240	>MDL	B(a)P 0.0002 ppm rest >0.4 ppm
Site Conc	0.002	0.086	0.026	0.635	0.001	<	

Return Reasons _____ IR/LAD _____ NOL _____

TEXAS PETROLEUM STORAGE TANK PROGRAM - INCIDENT REPORT (IR) FORM

FOR TCEQ USE ONLY **FOR** Complete this form when a report of a suspected/confirmed release from a regulated storage tank is received & provide to Admin staff. Information received by ☐ phone ☐ fax ☐ e-mail (print out & attach) ☐ other (explain on additional pages or on back).
 Date release was reported to TCEQ: 11/19/04 Initial here if new LPSI ID No. should be assigned: 202 PM 00 TL
 New LPSI ID# _____ Admin - fax completed form to RP & enter info in appropriate databases. Info entered in ☐ RDR Db. ☐ SMAPS
 on _____ (date) by _____ (Initials). Faxed to RP on _____ (date)

Texas Commission on Environmental Quality
INTEROFFICE MEMORANDUM

TO : FILE DATE: April 1, 2005

THRU : Maria Lebron, TCEQ On Site Supervisor
David Bratberg, Project Manager, Darcy Environmental Group

FROM : David Bratberg, Case Coordinator, Darcy Environmental Group

RE : File Review of Sac-N-Pac No. 506, 1424 Hwy. 46, New Braunfels (Comal County), Texas
(LPST ID NO.116472; Facility ID No. 47684; RDR ID 14256); R-13

Release Determination

November 2004 - Piping and dispensers replaced at active UST site. 1 soil sample > action levels; confirmation borings installed; sampled <SQL; MW installed soil < SQL; GW < action levels.

soil samples maximum (ppm):

benzene 0.026	toluene 8.200	ethylbenzene 7.600	xylenes 120.000	MTBE 0.62	TPH C ₁₂ -C ₂₈ >MDL	PAH B(a)P 0.56, rest>1
1.947	1.357	1.334	6.356	0.177	<	

Tankpit water (ppm)

benzene 0.005	toluene 1.000	ethylbenzene 0.700	xylenes 10.000	MTBE 0.240	TPH C ₁₂ -C ₂₈ >MDL	PAH B(a)P 0.0002, rest>0.4

groundwater sample maximum (ppm):

benzene 0.005	toluene 1.000	ethylbenzene 0.700	xylenes 10.000	MTBE 0.240	TPH C ₁₂ -C ₂₈ >MDL	PAH B(a)P 0.0002, rest>0.4
0.002	0.086	0.026	0.635	<0.001	<	

Eco Checklist completed: **YES**

SPLP conducted on soil: confirmation borings attempted, all results < SQL, no confirmation sample directly at previous hot spot.

Excavation conducted: No

MW installed: **YES; results < action levels**

Conclusions/Recommendations

- Soil: > action levels; confirmation samples could not locate soils > SQL to test for SPLP
- GW: < action levels
- Site will need to be evaluated again during UST removal
- LAD noAPAR

LPST ID NO.116472.cfm.wpd

INTEROFFICE MEMORANDUM

TO : FILE DATE: April 1, 2005

THRU : Maria Lebron, TCEQ On Site Supervisor
David Bratberg, Project Manager, Darcy Environmental Group

FROM : David Bratberg, Case Coordinator, Darcy Environmental Group

RE : File Review of Sac-N-Pac No. 506, 1424 Hwy. 46, New Braunfels (Comal County), Texas
(Facility ID No. 47684; RDR ID 14256); R-13

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0.002	0.086	0.026	0.635	<0.001	<	

Eco Checklist completed: **YES**

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- Soil: > action levels; confirmation samples could not locate soils > SQL to test for SPLP
- GW: < action levels
- Site will need to be evaluated again during UST removal
- LAD noAPAR

RDR14256.db2.wpd