FORBES
ENVIRONMENTAL
ENGINEERING & ASSOCIATES

PH2

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

DATE: June 29, 2005

MEMORANDUM

TO: Texas Commission of Environmental Quality

PST Division – RPR Section MC-137

P.O. Box 13087

Austin, Texas 78711-3087

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

JUL 06 2005

Received
JUL 0 5 2005
TCEQ/PST-RPR

QUESTION CONTRACT BUT I THAT The state of the second of the The statement of a section pass begins in our

Texas Department of License and Regulation

P.O. Box 12157 Austin, Texas 78711 (512)463-7880 FAX (512)463-8616

Email address water water and filed with the department within 30 days following the

Surface, cement top 2 feet. CASINGLERIAN WELL 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. CEMIENTARENTONITE PLUG(S) PLACED IN WELL FROM (feet) SACKS CEMIENT BENTONITE D. VALIDATION OF INFORMATION INCLIDED IN FORM 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. understand that failure to complete items 1 through 13 will result in the report(s) being returned for completion and resubmitted. City SAN ANTONIO State TEXAS Zip 78240			PL	ss: water. UGGIN	well@	license.sta EPODT	ate.tx.us		plugging c	of the well.	ang tile
Address Address Address City State 20 781322 781322 781322 781322 781322 781322	For: Forbes Envilonmental								PAC	GE TO	<u>:1</u>
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County GUADALIPE 124 HWY 46 NEW BRAUNFELS TX 78132 3) Owner's Well No. Long. Lat. Grid # 68 - 24 4) Type of Well Water Monitor Injection De-Watering 5) Drill, Pump Installer, or Landowster performing the plugging operations must locate and identify the location of the well within a specific prid on a full scale grided map available from Texas Natural Resource Information Service. The location of the well within a specific prid on a full scale grided map available from Texas Natural Resource Information Service. The location of the well within a specific prid on a full scale grided map available from Texas Natural Resource Information Service. The location of the well within a specific prid on a full scale grided map available from Texas Natural Resource Information Service. The location of the well within a specific prid on a full scale grided map available from the square to the right. The legal description is opiopical. 1380M 1380			1424 RW I	40			NEW B	RAUNFE	LS	TX	78132
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4) Type of Well		7 8 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			*********			RAUNFE:	LS		
December)					Lat.		1	Grid#	-l
B HISTORICAL DATA ON WELLY OB PULICED (Cavarable) B HISTORICAL DATA ON WELLY OB PULICED (Cavarable) O Driller JOHN E. TALBOT JOHN E. TALBO						□ De	-Watering				N
Source Course No. Signature Double Every Source Sour	grid by placing a corresponding dot in	the square to the	right. The legs	il descriptio	n is opt	ne location o ional.	it the well sh	ould be deno	specific grid ted within the		
7) Drilled 12 / 23 / 2004 8) Diameter of hole 8 inches 9) Total depth of well 45 feet CURRENT PLUGGING DATA 11) REMOVE ALL REMOVEABLE CASING Please check box beside the method of plugging used 12) Name of Driller/Pump Installer or Well Owner performing the plugging JAMES E. NEAL 11) REMOVE ALL REMOVEABLE CASING Please check box beside the method of plugging used 12) Name of Driller/Pump Installer or Well Owner performing the plugging JAMES E. NEAL 13) CASING APPLIANCE AND THE PLUGGING OF PRATION CASING APPLIANCE AND THE PLUGGING OF PRATION CASING APPLIANCE AND APPLIANCE AND THE PLUGGING OF PRATION CASING APPLIANCE AND					-	COLUMN TO	avanant				
C. CURRENT PLUGGING DATA	JOHN E. T.	ALBOT		License	NO.	3	3180M			X	
10 Name of Driller/Pump Installer or Well Owner performing the plugging JAMES E. NEAL Tremmie pipe cement from bottom to 2 feet from surface, cement top 2 feet.	7) Drilled 12/23/2004 8) I	iameter of ho	le 8	inches	9) To			45 fee	t		
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UPSF# (1647)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY				
 Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature X				
1. Article Addressed to: TH2/DLH MR KIRK BRUMLEY SAC-N-PAC STORES INC	MAY 1 1 2005				
1405 UNITED DR STE 115 SAN MARCOS TEXAS 78666 (LPST# 116472.LADNOAPAR)	3. Service Type Certified Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.				
na e e	4. Restricted Delivery? (Extra Fee)				
(Transfer from service label)	1110 0003 0833 7416 102595-02-M-1540				
PS Form 3811, August 2001 Domestic Re	eturn Receipt				

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	City, State, ZIP+4	ncus R	78466				
	DC Form 2000, June 201		See Reverse for Instructions				

Darcy Environmental Group 11044 Research Bivd. Ste A-500 Austin, Tx. 78759 (512)342-8585 (512)342-8989 FAX

facsimile transmittal

To: Helen Welch

From: Debra ext 21 or Jan ext 34

Re: New LPSTs #

CC:

Dear Helen,

Please issue new LPST numbers for the following:

RDR#

3199

FAC#

09133

Thanks, Debra & Jan

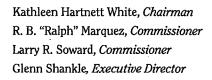
Fax: 239-2216

Date:

Pages:

2/24/05

GONFIDENTIAL







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.

POOR QUALITY ORIGINAL

FORM INSTRUCTIONS: Use this form to reppected/confirmed PST releases to the Tex mission on Environmental Quality (TCEQ) PST - Responsible Party Remediation - 512/239-2200 (phone), 512/239-2216 strpr@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.

TEXAS PETROLEUM STORAGE TANK PROGRAM - INCIDENT REPORT (IR) FORM								
Facility Information	Address:14 City: No			County:Comal T ID: □N/A □Unk				
Responsible Party (RP) Information	Company:S	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)	Company:			Zip:				
The RP is the:	X tank owner	tank operator	⊒ land owner	□ other (specify):				
Release Information	Release is: X Confirm	ned □ Suspected	Date of discovery	:11/18/04				
	•	Check all that	apply:					
Discovery X Routine tank closure or site assessment X 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/No □ Diesel/Fuel oil □ Waste oil □ Hydraulic/transmissic □ Jet fuel/kerosene □ Petroleum - unknown □ Unknown □ Other (describe): Impact □ Groundwater □ Surface water X Soil □ Air	on/mineral oil n type e:	Cause Spill Overfill Human error Faulty installation Corrosion X Unknown Other (describe): Location Tankhold X Dispenser area X Pipe chase Remote fill port Other (describe):				
Tank system has/had:	□ pressurized pipir	ng 🗆 suction piping	X 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 BB2 TH2 350 Release LADnoAPAR								
<<< TCEQ USE ONLY >>> to Admin staff. Information reduced Date release was reported to a contract of the co	PM - complete this form vicelved by □ phone □ TCEQ:11/19/04Admin - fa	☐ fax ☐ e-mail (print out & Initial here if new LP ax completed form to RP & €	attach)	a regulated storage tank is received & provide along an additional pages or on back).				

RDR REVI CHECKLIST - SITES POST 1/2003

FAC ID/RDR No.: 47684 1 14256 Or "ghost" (unregistered) tank: □ Y	Product(s) stored (check all that apply): ☐ gasoline ☐ diesel ☐ waste oil Other
Facility Sec - N-Pec No 506 Name & 1424 Hury. 46 Address: County, TCEQ Region: Ne vi3reunfels (Come 1) R-13	Tank system □ Removed
Pre-existing LPST ID No.? Y □ N [Date opened: Priority: Date closed
Comments: piping & disp. replaced - USTS # MW inshilled; star cont. sampled SPLP 01.	semain. I sample 7 achos. 4 boring. Sachon level, so no samples to set

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	V		
Water present in tank pit sampled		_	
Backfill sampled			
Descrip. of sample collection/handling methods			
Photographs			
Samples submitted to lab w/in hrsdays (24-48 hrs) of collection			
Person from Regional office present at removal			
Analytical			
Gas/Diesel □ BTEX □ MTBE □ TPH □ PAH on highest TPH >MDLs			
Waste Oil □ VOCs □ TPH □ PAH TPH >MDLs			
Hydraulic □ TPH □ PAH on high TPH			
If Other - correct analyses run?			

Checklist - Required Items con't	Y	N	n/a
COCs, site map, and lab reports match, & signatures, dates, and times, filled in	1		
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	1		
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 liquidyds³ solids		i	
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<="" td=""><td></td><td></td><td></td></action>			
Excavation conducted?			
<15' Soil (Remaining)< TotSoil _{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	4357	1,334	6.356	0.177	۷	
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	20.00	4	

Return Reasons IR/LAD NOL			
	Return Reasons	IR/LAD	NOL

FORM INSTRUCTIONS: Use this form to report suspected/confirmed PST releases to the report suspected/confirmed PST releases to the report suspected/confirmed PST - Responsible Party Remediation Section - 512/239-2200 (phone), 512/239-2216 (fax), pstrpr@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 512/608-9197.

TEXAS PE	TROLEUM STO	RAGE TANK PRO	GRAM - INCIDE	NT REPORT (IR) FORM				
Facility Information	Facility Name:Se	Sac-N-Pac No. 506	18130					
	· F	424 Hwy. 46		ad 12				
IIII UNZ		lew Braunfels						
1107101	Facility ID:476	684 'ghost' tar	nk Pre-existing LPS	ET ID: ON/A OUnk				
Responsible Party (RP) Information				512/ 392-6484				
(KP) IMOMIBLION	Company:S	Sac-N-Pac Stores, Inc	Fax:	.: _512/ 392-6333				
	Address:140	05 United Dr., Ste. 115	5					
				TX 78666				
Release reported by:	Contact Person:		Pho Pho	one:				
(if different from above)	Company:	· · · · · · · · · · · · · · · · · · ·	<u></u>					
ļ	Address:		State/	- .				
The RP is the:				Zip:				
Release Information	Release Is: X Confirm		T	O other (specify):				
Kelease information	Kelease is v Commi	med Suspected Check all that		<u>/:11/18/04</u>				
Discovery		Substance	appis,	Causa				
X Routine tank closure	, or	X Gasoline (Leaded/No	on-leaded/Unknown)	□ Spill				
site assessment X Laboratory analytical	results	☐ Diesel/Fuel oil ☐ Waste oil	I	□ Overfill □ Human error				
☐ Free product or sheet	∌N	☐ Hydraulic/transmissio	ion/mineral oil	☐ Human error ☐ Faulty installation				
☐ Odors		☐ Jet fuel/kerosene		☐ Corrosion				
☐ Automatic tank gauge ☐ Probe or sensor	•	☐ Petroleum - unknowr ☐ Hazardous substance	n type ⊤	X Unknown □ Other (describe):				
☐ Inventory records		□ Unknown		, ,				
☐ 1-mo. SIR failure or 'l☐ 2-mo. Inventory contr	inconclusive	Other (describe):		Location				
☐ Tank tightness test fa	failure	<u>Impact</u>	!	☐ Tankhold X Dispenser area				
☐ Line tightness test fai ☐ Groundwater monitor	aiture	Groundwater	1	X Pipe chase				
□ Vapor detector (auto ·	or manual)	☐ Surface water X Soli	ļ	☐ Remote fill port				
☐ Water supply contam		□ Air		☐ Other (describe):				
Tank system has/had:	☐ pressurized piping	ig □ suction piping	X unknown DNA	Α				
Other parties notified (F	ire, police, etc list):							
	· ·							
Free product present? etc.), and/or actions take	□ Yes □ No De ken to mitigate any fire, «	escribe steps taken to co , explosion, or vapor haza	introl and abate releas∉ em:	e (system repairs, free product removal,				
A the country of subsettingments								
	Additional comments (add pages as needed):							
RDR ID 14256								
BB2 TH2. 350 Release LADnoAP/	2AD							
CICEG USE ONLY		es, in the which the feet and the country of country	museumara at bt ? 66 f wbei e' nt .	and the stript was a sent to stript which was a sent to stript was a sent to strip was a sent to strip was a sent to strip was a sent to stript was a sent t				
Information re	Complete use to the terms	ABIN & report of a suspection	confirmed release from a	a regulated storage tank is received & provide				
Date release was reported to To	rceo: <u>1:1/19/04</u>			in on additional pages or on back)				
			ST ID No. should be usely	MANUAL PROPERTY OF THE PROPERT				
on (dr	ate) by (Initials).	Famed to RP on	Rest Tributed to the State of t	Hoses Interestin DRDR Db. SMAPS				

Texas C() mission on Environment

INTER-FFICE MEMORANDUM

TO

FILE

:

:

DATE: April 1, 2005

THRU

Maria Lebron, TCEO 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):

benz		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
0.0	02	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

Texas C vission on Environment vality

INTEROFFICE MEMORANDUM

TO

FILE

DATE: April 1, 2005

THRU

Maria Lebron, TCEO 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

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

groundwater sample maximum (ppm):

- 1	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	V	

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 > SOL to test for SPLP
- GW: < action levels
- Site will need to be evaluated again during UST removal
- LAD noAPAR

RDR14256.db2.wpd