

Timeline:
2705326 – SR# 1298 – Facility ID # 009194
1910 N. State Route 89, Chino Valley, AZ
3/6/24

“All Clear” report was received shortly before the Release Incident:

- **12/11/23**
 - Vendor conducted routine UST system inspection.

- **12/22/23**
 - Inspection Report completed and submitted into Circle K Data System (Titan).
 - Report based on 12/11/23 inspection indicates sensor in normal state; small amount of water in L3 sump (STP) area-see below.

Thus, Report did not register a concern with the STP.



First Indication of an Incident:

- **12/15/23**
 - L3 STP sump fuel alarm occurs on ATG at 4:59 am.
 - Circle K In-Store personnel have access to the alarm, but do not generate a work order for Circle K Facilities to acknowledge and respond.
 - Furthermore, the Titan system (which should function to create alarm events for matters of this nature for general distribution to Circle K responders) did not generate an activity report.

Further Missed Opportunities to Identify the Concern:

- **12/20/23**
 - Work order generated by Circle K staff due to fuel dispenser dispensing fuel too slowly — slow flow.
 - Circle K service tech responds to call, notes issue “resolved”.
- **12/25/2023**
 - Work order generated by Circle K Store staff regarding dispensers unusually slow in dispensing fuel product.
 - Circle K technician notes L3 fuel alarm, but also reports that the issue was “resolved” and “no issues” found.
- **12/26/23**
 - Work order generated by Circle K in response to small amount of water identified on 12/11/23 routine monthly visual inspection.
 - Sunbelt, Circle K’s water removal vendor, dispatched for removal of liquid (reported as water) from sump; Sunbelt discovered presence of fuel in lower portion of sump.
 - Invoice sent by Sunbelt for service to Circle K Service manager for payment, but no report sent by Sunbelt to Circle K Environmental services regarding fuel present in sump area.
- **12/26/23**
 - Work order generated, due to dispensers unusually slow in dispensing fuel as well as the Veeder Root L3 alarm (the sump alarm).
 - Circle K service technician on arrival notes “all pumps are flowing fine”; attributes slow flow to “cold weather drop offs”.

Cause of Release Incident Identified and Repaired:

- **1/3/24**
 - L3 (sump) alarm active. Accordingly, site visit by water removal vendor, Sunbelt.
 - Sunbelt reports observing fuel spraying out of turbine pump.
 - Circle K environmental response team advised and issues work order for Maverick Petroleum to service site and conduct repair based on report from Sunbelt.
 - Sunbelt, Maverick, Circle K technicians all on site analyzing sump, fuel at the bottom of the sump-repairs completed to system components.

- Circle K retains environmental consultant (Encore) to prepare suspected release report based on observations.
- **1/4/24**
 - Circle K consultant, Encore, prepares and submits initial suspected release report to ADEQ, indicates **suspected release discovered 1/3/24.**

Circle K had not yet discovered that the release incident had been ongoing for some time prior to 1/3/24.

Magnitude of Incident Evaluated:

- **1/4/24 – 1/18/24**
 - 14-day suspected release report prepared and submitted to ADEQ on 1/18/24 regarding the incident.
- **1/16/24 – 2/1/24**
 - Circle K notices large unleaded fuel variance while preparing to close the previous accounting period. Passing CSLD (leak detection during “quiet” time) and tank tightness results contributed to conclusion at that time that a large fuel release was not the cause of the fuel inventory discrepancy.
 - Circle K proceeded to investigate the following causes over the next few weeks:
 - Theft – Thorough review of video at site during loss period. Looked for vehicles parked over fills, trucks with bladders in the back dispensing fuel for abnormal amounts of time, etc. Also reviewed transactions to determine if there was a change in average fill that would point to pulser manipulation.
 - BOLs – Reviewed all BOLs for fuel liftings between 12/19/23 and 1/3/24. Investigated potential theft from tanker drivers, undocumented retains, BOLs provided to site with no product delivered. Verified that a delivery corresponded to each BOL, truck was onsite, and ATG showed corresponding inventory increase.
 - Fuel Accounting – A review of inventory, deliveries, and possible missing sales.
 - Reviewed tank charts to determine if VeederRoot was incorrectly programmed.
 - Reviewed transactions to determine whether a mechanical malfunction was allowing customers to get more fuel than they paid for.
 - Indication of a high volume release not yet apparent.

Approximate Magnitude of Release Incident Realized and Reported

- **2/1/24 - 2/15/24**

- *Throughout this time Circle K continues to internally evaluate information on fuel inventory records, deliveries and throughput. Circle K gains understanding that the incident ties back to 12/15/23 alarm.*
- *Circle K verbally notifies ADEQ on 2/15/24 that the release was more substantial than originally understood.*

- **2/21/24**
 - Sample results obtained from 2/16/24 investigative borings, showing subsurface contamination.
 - ADEQ advised by Circle K on 2/21/24 via 24-hour Confirmed Release Report of confirmed release based on soil analytic data.