February 26, 2020

William Bergum
Environmental Science Specialist
Petroleum Technical Section, Montana DEQ
P.O. Box 200901
Helena, MT 59620

Dennis Connor
Capital Brew LLC
520 3rd Avenue North
Great Falls, MT 59401

RE: Standardized Corrective Action Plan for one year of Semi-Annual Groundwater Monitoring (CAP MR-01), for the Petroleum Release at the Former Sinclair Retail 25009, 1800 Prospect Avenue, Helena, MT; Facility ID 25-02093, Release 0441, Work Plan 10205

Dear Mr. Bergum,

Water & Environmental Technologies (WET) is pleased to provide this attached Corrective Action Plan (CAP) and cost estimate for environmental consulting services at the abovementioned facility. The CAP was prepared in response to a Montana Department of Environmental Quality (DEQ) Work Plan Request letter dated January 14, 2020.

Site Conditions and Background

The Former Sinclair Retail (Site) is located at 1800 Prospect Avenue in Helena, Montana. The legal description for the facility is Lots 14-16, Block 77, of the Northern Pacific Addition, Township 10 North, Range 3 West, Section 29.

An approximate 400-gallon gasoline release at the facility was discovered in April 1990 after a failed leak detection test at the site. In March 1991, Olympus Technical Services installed a soil vapor extraction (SVE) system after discovering free product in two on-site monitoring wells. Operation of the SVE system occurred from its installation in March 1991 until December 2003. Groundwater monitoring has recurred intermittently from the time of the initial release through November 2018.

Tetra Tech performed UST removal, excavation, and soil confirmation at the site in October 2007. Between October 2007 and September 2012 there was no work performed at the site. In October 2012, Tetra Tech inspected existing monitoring wells prior to consulting services transferring to Water and Environmental Technologies.

Purpose and Objectives of Sampling

The purpose of the work described in this CAP is to gather additional information regarding site contaminant concentrations, in order to move forward toward eventual site closure.

Scope of Work

The scope of work specified in the DEQ Work Plan Request includes performing one year of semi-annual monitoring (two events) and subsequent reporting. Reporting will consist of a Standardized Groundwater Monitoring Report (Report_MR-01) submitted after the second groundwater monitoring event. WET's proposed approach to complete the work in accordance with DEQ's letter request is detailed in the following paragraphs, with the exception of Work Plan Preparation.

PROPOSED WORK

Project Management

WET personnel will provide informal status reports to Mr. Dennis Conner (Capital Brew, LLC) and DEQ on an as-needed basis. Other duties associated with this task include scheduling field work and project reporting; coordinating field activities with current facility operators; and monitoring the project budget and deliverables.

Mobilization

WET personnel will mobilize to the site approximately two times to complete the work specified in the CAP.

Groundwater Monitoring and Analysis

WET personnel will conduct two groundwater monitoring events. One event will take place during historical high groundwater (April-June 2020) and one will take place during historic low groundwater (October-December 2020). Facility wells PM-1R, PM-3, PM-4R, PM-5, and M-8 will be monitored. Groundwater monitoring of each well will include measurement of static water levels and monitoring of field water quality parameters (pH, temperature, specific conductivity, dissolved oxygen, turbidity, and oxidation reduction potential) using a flow through cell and YSI combination meter. Once parameters have stabilized, a groundwater sample will be collected using a peristaltic pump and the low-flow method; samples will be submitted to Energy Laboratories in Helena, Montana for volatile petroleum hydrocarbons (VPH), extractable petroleum hydrocarbons (EPH) screen, lead scavengers (1,2-Dichloroethane & ethylene dibromide), and intrinsic biodegradation indicators including methane, ferrous iron, nitrates/nitrites, sulfates, and dissolved manganese during both monitoring events.If the EPH screen results exceed 1,000 µg/L, the sample will be further analyzed for EPH fractions. If, during the 2020 high groundwater monitoring event, none of the samples have lead scavenger detections, then samples will not be analyzed for lead scavengers during the 2020 low groundwater monitoring event.

One trip blank and one field duplicate sample will be analyzed for each sampling event for quality assurance/quality control (QA/QC) purposes. The field duplicate sample will be collected by splitting a natural sample in the field. The QA/QC samples will be submitted to Energy Laboratories and analyzed for the same constituents as the natural samples.

Waste Management

Purge water generated from groundwater monitoring will be disposed of in accordance with the DEQ purge water disposal guidance. Much of the site is paved, however, there is a portion of pervious ground on the north end of the site, inside the property boundary. No free product was detected in wells during 2017 or 2018 monitoring events, therefore purge water will be discharged to pervious ground. Should conditions exist that preclude purge water disposal (i.e. free product), purge water will be containerized and properly disposed of.

Data Validation

The analytical data will be validated by qualified WET personnel in accordance with DEQ standards and a data validation summary will be included in the final report.

Project Reporting

Upon completion of monitoring activities, and within 60-days of receipt of analytical results, WET will prepare and submit a Report_MR-01 after the second monitoring event, which will include a discussion of any data gaps that may exist and a release closure plan.

COST AND SCHEDULE

Work effort levels have been estimated using best professional judgement and typical scenarios related to work of this type. The estimated cost for WET to complete this project is $14,156.50. A detailed cost estimate is provided as **Attachment A**.

If you have any questions or concerns, please contact me at lsurratt@waterenvtech.com or by phone at 406-782-5220.

Sincerely,

Laura Surratt, MS, EI
Project Engineer

Attachments: Attachment A – Project Cost Estimate

ATTACHMENT A

Project Cost Estimate

Water & Environmental TECHNOLOGIES

ATTACHMENT A.
PROJECT COST ESTIMATE
Date: February 26, 2020

Former Sinclair Retail 25009

TASK DESCRIPTION	UNIT COST	UNITS	QTY	PRICE
TASK 1. Project Management				
Project Engineer/Hydrogeologist	$125.00	HOUR	6	$750.00
			TASK 1 SUBTOTAL:	**$750.00**
TASK 2. Work Plan Preparation (CAP_MR-01)				
Project Engineer	$125.00	HOUR	1	$125.00
Staff Engineer/Hydrogeologist	$108.00	HOUR	5	$540.00
			TASK 2 SUBTOTAL:	**$665.00**
TASK 3. Mobilization				
Staff Engineer	$108.00	HOUR	6	$648.00
Mileage	$0.630	MILE	300	$189.00
Per Diem	$30.50	PERSON/DAY	2	$61.00
			TASK 3 SUBTOTAL:	**$898.00**
TASK 4. Field Work (5 Wells, 2 Events)				
Staff Engineer	$108.00	HOUR	15	$1,620.00
Dual Interface Probe	$8.00	HOUR	8	$64.00
YSI Meter	$10.00	HOUR	8	$80.00
Peristaltic Pump	$11.00	HOUR	8	$88.00
			TASK 4 SUBTOTAL:	**$1,852.00**
TASK 5. Laboratory Analysis (Groundwater, 10 samples) *				
Energy Laboratories Analytical Quote	$6,250.00	LUMP SUM	1	$6,250.00
- VPH				
- EPH Screen		* Energy Laboratories quote includes EPH fractionation for one sample. Analytical services will be invoiced at actual costs		
- Lead Scavengers				
- Intrinsic Biodegradation Indicators				
- PTRCB Sample Fee				
			TASK 5 SUBTOTAL:	**$6,250.00**
TASK 6. Data Validation				
Project Engineer	$125.00	HOUR	1	$125.00
Staff Engineer	$108.00	HOUR	4	$432.00
			TASK 6 SUBTOTAL:	**$557.00**
TASK 7. Project Reporting (Report_MR-01)				
Senior Hydrogeologist	$135.00	HOUR	0.5	$67.50
Project Engineer/Hydrogeologist	$125.00	HOUR	2	$250.00
Staff Engineer/Hydrogeologist	$108.00	HOUR	12	$1,296.00
GIS Specialist	$97.00	HOUR	6	$582.00
			TASK 7 SUBTOTAL:	**$2,195.50**
TASK 8. Project Reporting (Release Closure Plan)				
Project Engineer/Hydrogeologist	$125.00	HOUR	1	$125.00
Staff Engineer/Hydrogeologist	$108.00	HOUR	8	$864.00
			TASK 8 SUBTOTAL:	**$989.00**
TOTAL PROJECT COST:				**$14,156.50**