Griffith Environmental Consulting Inc.
5089 Hedges Drive
Helena, MT 59602
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16 April 2019

Mr. Dave Skiff
Ezzie's Wholesale Inc.
P.O. Box 1770
Malta, MT 59538

RE: Revised Remedial Investigation Work Plan for the petroleum Release at the former Ezzie's Westside AST Bulk Facility at the Corner of US Hwy 191 and US Hwy 2, Malta, MT. Facility #30-06671, Release #4468, Work Plan #10982.

Dear Mr. Skiff:

Per Mr. Schiff's WPR from 13 December 2018 which unfortunately got lost in the email electronic repository and based on revisions to the 22 March 2019 plan, I have prepared this revised work plan to locate and complete four (4) ground-water monitoring wells on the Westside property. In addition Mr. Schiff has requested that the soil at the soil land farm be sampled as is required by the DEQ to collect the soil sample data necessary to close the land farm. Between the initial response to a pinhole leak and the very selective soil removal in 2006 and the extensive excavation in October 2014, about 1700 cubic yards of soil were removed. Fortunately, the land farm site was located just east of Malta on land owned by Ezzie's Wholesale which was a critical factor in keeping costs down.

In the soil report, I stated that I felt that wells were not necessary because the contaminated soil was easily defined by color and odor with field confirmation by head space screening with a PID and that the field evidence strongly suggested that most, if not all, of the contaminated soil was removed. However, Mr. Schiff has determined that borings completed as wells are necessary; two in the soil excavation area and two down-gradient from the excavation site. Keeping wells out of the truck routes and parking area given these new location criteria was simply not possible. As a result, I contacted Bishop Construction and asked for their assistance in properly preparing the well sites to withstand very heavy loading. To achieve the best result possible, I plan on having Mr. Bishop prepare a 4-5 foot deep square hole around each well's casing riser into the bentonite seal; add up to 1 cubic yard of washed gravel in the bottom to provide a pad for the concrete; and then finish the vault installation with 1+ cubic yard of 6 sack concrete with 4-inch square reinforcing steel mesh of ¼ inch steel wire. These well vault installations would then be fenced off to allow the concrete to cure for at least 10 days. The revised Figure 2 shows the new well locations.

In order to ensure that these wells were located to obtain the data necessary to achieve release closure, there was no choice but to locate them where Mr. Schiff wished to have them and for me to ensure the construction of the surface protection so that the wells will endure the test of time given the expected loading. I am fully aware that this changes the plan from my first effort, but I believe that if the vaults are properly installed there should be no problems with well

access or failure of the vaults. Figure 2 shows the same area with the revised well locations. If you have any questions regarding these changes, please contact me immediately. I will not start this effort until I have the obligation letter from the PTRCB which includes the approval of ALL the estimated costs for all the stated tasks.

Sincerely,

Earl F. Griffith PG

Earl F. Griffith P.G.
Wyoming # 1033

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Dear Mr. Skiff:

Pursuant to Mr. Schiff's request for a work plan for the completion of soil borings and wells following the removal of over 1700 cubic yards of soil from the former AST area in October 2014, I have prepared the following description of the planned work. As I indicated in the cover letter, well placement and construction are very critical factors because of the heavy truck traffic through the area and its use as a parking area. In addition, the costs for all work here is jointly shared between Ezzie's Wholesale and Mr. Bobby Ereaux because the tank that had a leak was both a bulk tank and served Westside prior to Ezzie's passing. For this release, the deductible has been met so neither entity has any potential financial outlay for necessary and reasonable remedial/monitoring activities; the end goal is to achieve release closure.

Regardless of who the drilling contractor is, the wells will be bored and completed according to the DEQ protocols by a licensed driller. I received bids from two drillers for boring and completion, but without the addition of the surface protective cover since I have chosen to go with 18"x18"x18" steel vaults which I will assist in installing with my associate. I obtained initial verbal approval from Mr. Ereaux on 27 March for the well placement indicated on the original site figures. However, given the high risk of damage from heavy truck traffic at the new well locations (see revised Figure 2), I felt that a revision of the vault installation method was needed. As with the soil removal, Mr. John Carter will assist me so that efficiencies can be realized in splitting out task specific work so that I can oversee the boring, soil sampling, and well completion and Mr. Carter can develop the wells, assist in the placement of the high load vaults for the wells, and assist in the well casing elevation survey. In addition Mr. Carter can begin sampling the wells while I will complete sampling the land farm soils so that facility can be closed.

Soil Borings

In keeping with the policies of the DEQ, the borings will be drilled with a 4-inch hollow stem auger to a depth 5 feet or more below the top of the areal ground water table. Split spoon soil samples will be collected from 5 feet below ground surface (bgs) to the horizon displaying the highest organic vapor readings based on heated head-space screening using a Mini Rae PID. The boring would then be completed as a 2-inch monitoring well. Soil samples will be collected from all four borings and analyzed for VPH constituents as well as screened for EPH.

Given the planned wells' proximity to the Milk River and the significant water-table fluctuations that take place seasonally, the screened section will likely be 20 feet.

Monitoring Well Completion

The planned borings will be completed as a 2-inch PVC monitoring wells. To ensure that ground-water elevation changes are reflected in the screened portion of the well, the well will have 20 feet of 0.020 inch slotted screen sand packed with 10/20 sand from 26-28 feet bgs to about 6-8 feet bgs. The solid casing will be sealed with hydrated bentonite chips from 5 feet to 7 feet bgs to allow for placement of a washed gravel subgrade base for the concrete. I anticipate that about 1 cubic yard of gravel will be necessary as subgrade material above the bentonite seal. The modified square hole around the casing will then be partially filled with 6-sack concrete, with a 4-inch by ¼ inch steel mesh frame approximately 34 inches on each side by 16 inches high set into the concrete, and the vault centered inside this mesh reinforcing framework. Concrete will then be carefully placed around the flush to the angle iron lip of the vault and the concrete vigorously vibrated to ensure a good strong completed installation. Each completed vault will then be isolated with the use of very visible traffic cones and allowed to cure for at least 7 – 10 days.

Upon completion, all the wells will be surveyed to a permanent fixture (ie, dispenser island or a nail in a power pole) to establish an artificial benchmark from which the top of casing (TOC) well elevations can be established.

Well Development and Sampling

The new wells will be developed by surge bailing and pumping a minimum of 15 gallons of water. Due to the tight nature of the Milk River silt, clay, and fine sand, development of the wells will be conducted immediately upon completion so that the wells will have time to acclimate for a few hours before sampling. All the wells will be sampled by low flow methods using a peristaltic pump. Samples will be collected when the field parameters of conductivity, temperature, pH, and ORP are consistent to within 10% of any previous reading. Upon completion of sample collection, a down-hole DO/temperature probe will be used to establish those parameters in the aquifer.

All samples will be properly preserved and placed in a cooler with ice for subsequent transport to the lab.

Data Validation

Once the lab data are received, I will review the data to ensure that they meet the standards required by the DEQ. This new task consists of filling out a four (4) page form detailing the QA/QC data from the EPA approved lab and adding a duplicate sample from one well to the sample stream to confirm that the lab's procedures are being followed.

Release Closure Plan

Another document now required by the DEQ is a Release Closure Plan (RCP) which tracks the release history and is a critical path method to select the best remedial method if one is needed. As with the data validation form, this form is at a minimum a four (4) page Excel spread sheet that takes considerable time to complete. Both the data validation form and the RCP table will be added to the main report as appendices and will be billed as separate tasks.

Report Preparation

Upon receipt of the analytical results, **gec** Inc. will provide the data to the DEQ for discussion relating to potential changes to the sampling protocols for the low-water event. After the second event, gec will prepare a report (RIR-01) outlining the methods of investigation and sampling and the interpretation of the data. Whenever possible, data specific figures will be used to present the results and provide data interpretations.

If the soil and ground-water data clearly show that there is no contamination or obviously low levels of contamination on the site, I will recommend that the property be released from regulatory oversight after a second sampling event to confirm the site conditions.

Work Plan Prepared by:

Earl F. Griffith PG

Earl F. Griffith PG

Wyoming # 1033

cc: Mr. Allen Schiff
Mr. Bobby Ereaux

Cost Estimate 16 April 2019

Former Ezzie's Bulk Plant at Westside Service,
Facility; ID # 36-06671, Release #4468, WPID #10982

Task 1: Work Plan/Cost Estimate Preparation-AC-01

gec Labor	Units	Rate	Cost
	PTRCB Fixed Cost Task 1		**$465.00**

Task 2: Mobilization; Helena to Malta, and Back Plus misc. Mileage: 625 miles (includes 2 hours of prep/demob)

(115.00 + 134.75) X 1/60 (avg. speed) =	4.16
249.75 /625 (total miles) =	0.40
Vehicle cost per mile =	0.63
Calculated cost per mile	$5.19/mile

Estimated Costs Task 2: 625 miles X $5.19 = $3,243.50

Task 3: Well Boring, Completion, and Development. Estimated costs based on Staff Scientist rate to log soils, sample soils, and conduct head space screening.

gec Labor	Units	Rate	Cost
Staff scientist	8	134.75	$1078.00
	Estimated Labor Task 3		**$1,078.00**

Direct Costs	Units	Rate	Cost
Soil samples			
VPH	4	$125	$500.00
EPH screen	4	$75	$300.00
PID rental	1 day	$90.00	$ 90.00
Sample fee	4	$10.00	$ 40.00
Contracted services (see attached bids)			
Well boring and completion-Hansen Drilling			$3,920.00

Estimated well completion/analytical costs Task 3 $4,950.00

Estimated Costs Task 3 $6,028.00

Task 4: Well Development and Flush Mount/Vault Placement

gec Labor	Units	Rate	Cost
Staff engineer	8	115.00	$920.00
	Estimated gec labor Task 4:		**$920.00**

Direct Costs	Units	Rate	Cost
Purge pump	1 day	$53.00	$ 53.00
Steel vaults	4	$300.00	$1200.00
Shipping costs	1	$300.00	$ 300.00
Concrete	5 yds.^{3}	$130.00	$ 650.00
Gravel	5 yds.^{3}	$ 20.00	$ 100.00
Backhoe & operator	4 hrs.	$125.00	$ 500.00
	Estimated Direct Costs Task 4:		**$2,803.00**
	Estimated Costs Task 4:		**$3,723.00**

Task 5: Land Farm Soil Sampling

gec Labor	Units	Rate	Cost
Staff scientist	3	134.75	$404.25
	Estimated labor Task 5		**$404.25**

Direct Costs	Units	Rate	Cost
Soil samples			
VPH	5	$125	$625.00
EPH screen	5	$75	$375.00
Fee	5	$10	$ 50.00
	Estimated Direct Costs Task 5		**$1,050.00**
	Estimated Costs Task 5		**$1,454.25**

Task 6: Well Monitoring-Includes one duplicate sample for QA/QC compliance

Direct Costs	Units	Rate	Cost
Well Sampling	4	$210.00	$840.00
	Estimated sampling costs		**$840.00**

Analytical Costs	Units	Rate	Cost
VPH	5	$125.00	$625.00
EDB and DCA (MW-1)	1	$165.00	$165.00

EPH screen	5	$75.00	$375.00
Fee	5	$10.00	$ 50.00
	Estimated Analytical Costs		**$1,215.00**

Direct Costs	Units	Rate	Costs
Meals	4 days	$23.00	$92.00
	Estimated Direct Costs		**$92.00**
	Estimated Costs Task 6		**$2,147.00**

Task 7: Well survey

gec Labor	Units	Rate	Cost
Proj. scientist	2	$134.75	$269.50
Staff engineer	2	$115.00	$230.00
	Estimated labor Task 7		$499.00

Direct Costs	Units	Rate	Costs
Survey equipment rental	2	$24.00	$48.00
	Estimated Costs Task 7:		**$547.00**

Task 8: Content Determination and Preparation of the RCP

gec Labor	Units	Rate	Cost
Senior Scientist	6.0 hrs.	$151.00 hr.	$906.00
Staff engineer	4.0 hrs	$115.00 hr.	$460.00
	Estimated Costs Task 8		**$1,366.00**

Task 9: Data Validation Form

gec Labor	Units	Rate	Cost
Senior Scientist	3.0 hrs.	$151.00hr.	$453.00
	Estimated Costs Task 9		**$453.00**

Task 10: Initial RI Report **$3,175.00**

Total Estimated Costs **22,601.75**

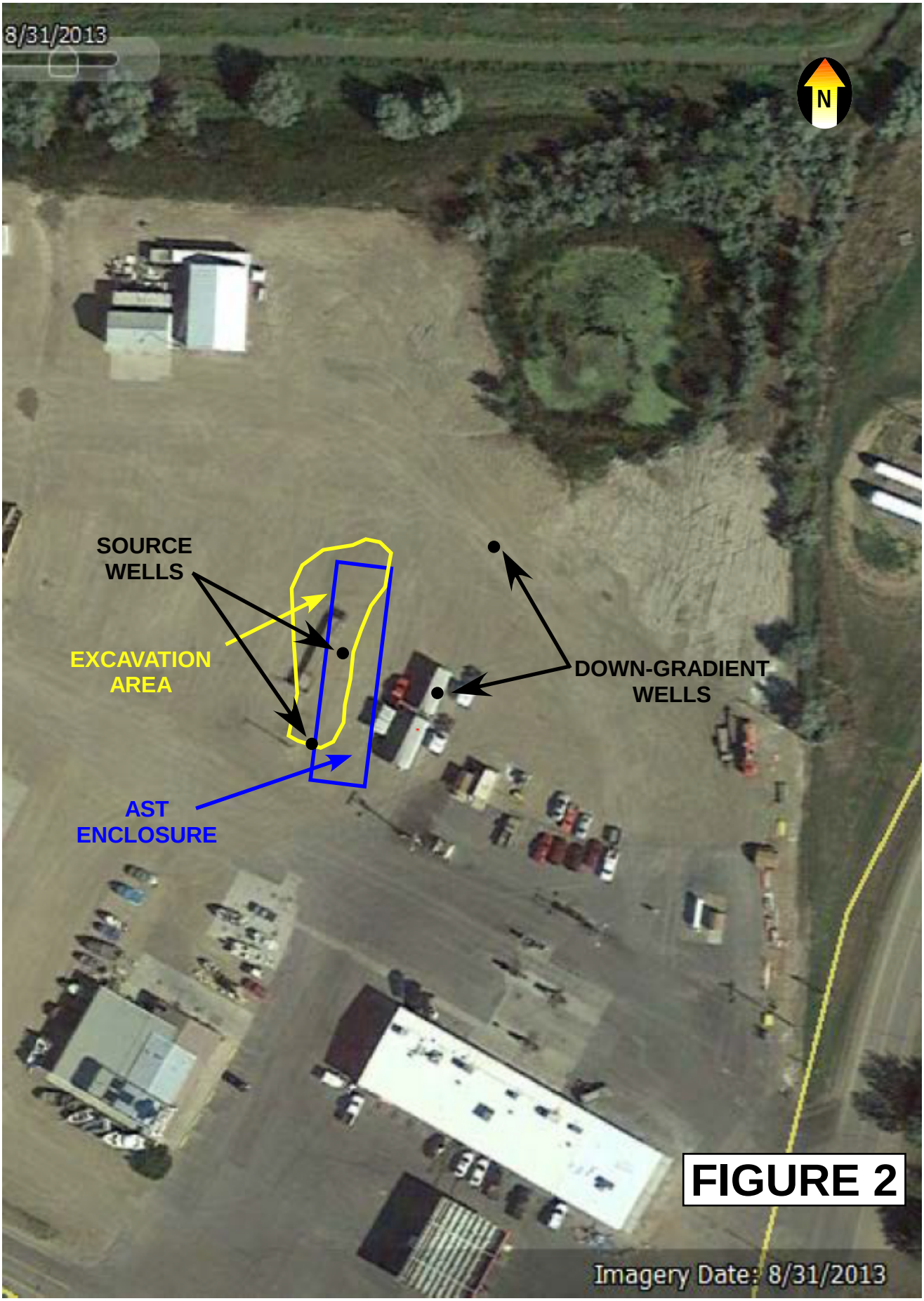
8/31/2013
N
SOURCE WELLS
EXCAVATION AREA
AST ENCLOSURE
DOWN-GRADIENT WELLS
Imagery Date: 8/31/2013

FIGURE 2