



September 16, 2020

Mr. Donnie McCurry
Project Manager
Petroleum Tank Cleanup Section
Montana Department of Environmental Quality
P.O. Box 200901
Helena, MT 59620-0901

RE: Standard Initial Remedial Investigation Corrective Action Plan (CAP_RI-01)
ConoMart Superstore #2 Facility
411 East 1st Street, Yellowstone County, Laurel, MT
Facility ID# 56-06966 (TID 30151) Release #5411, WP ID 34160

Dear Mr. McCurry:

On behalf of C-Store Properties, LLC, Pioneer Technical Services, Inc. (Pioneer) is submitting this corrective action work plan for the ConoMart Superstore #2 facility. The location of the facility is shown on Figure 1 in Attachment 1. As requested in correspondence from the Montana Department of Environmental Quality (DEQ) dated July 29, 2020, our scope of work and associated costs are detailed below.

PROPOSED SCOPE OF SERVICES

The work will include installing 10 soil borings and constructing 8 of the borings into 1-inch diameter groundwater monitoring wells at the subject facility to further investigate and define the extent and magnitude of petroleum contamination from Release #5411. The work will include four tasks:

- Task 1 – Project Management and Planning.
- Task 2 – Complete Soil Boring and Well Installation Activities.
- Task 3 – Conduct Groundwater Monitoring Event.
- Task 4 – Reporting

Task 1 – Project Management and Planning

Task 1 includes managing, scheduling, organizing, and planning the work, including the tasks below:

- Coordinating site work.
- Preparing the work plan.
- Scheduling personnel and subcontractors.
- Coordinating activities of owners and regulators.
- Preparing a site-specific health and safety plan.
- Verifying utility location and documentation prior to site work.
- Conducting planning meetings with owner and DEQ project manager as deemed necessary by DEQ project manager.

We will prepare a project site-specific health and safety plan and complete the work as approved by the Montana DEQ and the Petroleum Release Compensation Release Board (Petro Board).

Related to scheduling, we will manage, schedule, and supervise all work to make sure it is completed as proposed and in a timely manner.

Task 2 – Complete Soil Boring and Well Installation Activities

The work includes drilling 10 soil borings at the facility and constructing 8 of them into 1-inch diameter groundwater monitoring wells. The wells will be installed in the vicinity of the underground storage tank (UST) basin and pump islands and areas upgradient and downgradient from these potential source areas. The anticipated total depth of the borings and monitoring wells is 16 feet below ground surface (bgs). This is based on groundwater measured at 11 feet bgs at the site. We will advance the soil borings using Pioneer's direct-push Geoprobe® drill rig and associated equipment to conduct the soil investigation. Figure 2, Site Map (in Attachment 1), shows the location of the 10 soil borings. Using a direct-push rig will minimize site disturbance and the amount of investigation derived waste (cuttings) generated during this portion of the investigation.

Final boring locations will be determined in the field after consultations with the Montana DEQ project manager and based on accessibility, underground utilities, the presence of unforeseen impedances, or other factors.

For the groundwater monitoring well installation phase, the team will use the Geoprobe® unit to construct the wells. The monitoring wells will be constructed with 1-inch diameter, schedule 40 polyvinyl chloride (PVC) pipe. All well screens and piping will be delivered to the site factory wrapped. Each well will be constructed using a prepack well screen consisting of 0.010-inch, factory-slotted PVC screen covered with a 65-mesh stainless steel screen and filled with 20/40 mesh silica sand. The wells will be screened from 6-16 feet bgs. The remainder of the borehole will be completed with PVC riser pipe to grade. The annular space between the prepack well screen and the borehole will have 0.10-0.20 inch sand completion to 2 feet above the screen, whereas the remaining annular space between the well casing and the borehole will have a bentonite seal. The wells will be secured with bolt-down covers set in concrete.

The wells will be developed after construction by pumping until they are clear of sediment. Following well installation and development, the new wells will be surveyed by a licensed surveyor and the top of casings will be determined to within 0.01 feet of mean sea level.

A Pioneer engineer or geologist will supervise drilling operations and be present to collect, screen, and log soil types. Soil samples will be collected at continuous intervals and personnel will log the soil type and consistencies and document any visible signs of petroleum impacts. Standard headspace readings will be collected using a photoionization (PID) meter. A portion of each soil sample will be placed into an airtight container, labeled, and allowed sufficient time for the hydrocarbons, if present, to volatilize. After the equilibration period, each sample will be scanned with a PID meter by inserting the sampling probe into the headspace of the container. The PID readings from each soil sample collected from each borehole will be reviewed and recorded. The sample with the highest reading, or with other signs indicating petroleum impacts, will be selected for laboratory analysis. The sample collected closest to the water table at the time of drilling will also be submitted for analysis. A maximum of 2 samples from each boring will be submitted for laboratory analysis.

The selected samples will be placed into a laboratory-supplied container, labeled, stored on ice, and submitted to Energy Laboratories, Inc. in Billings, Montana, for volatile petroleum hydrocarbon (VPH) and extractable petroleum hydrocarbon (EPH) screens. If the EPH screen result is greater than 200 milligrams per kilogram (mg/kg), the sample will be submitted for EPH fractionation analysis. For this work plan, we are assuming that one half of the samples will need to be fractionated. Chain of custody documentation will accompany the samples.

Task 3 – Conduct Groundwater Monitoring

Pioneer personnel will collect groundwater samples from the 8 new wells. Approximately 2 weeks after the new wells are installed and developed, the wells will be purged and sampled. Prior to groundwater sample collection, we will gauge each of the wells for the presence of light non-aqueous phase liquid (LNAPL). Each well will be gauged using an electronic interface probe capable of detecting water or LNAPL hydrocarbons to within 0.01 feet. If the well does not contain LNAPL, the team will collect groundwater samples. If LNAPL is detected, the team will not collect any samples, note the conditions in a logbook, and notify the DEQ case manager.

The groundwater samples will be collected in accordance with low-flow sample techniques. To ensure representative groundwater samples are collected, we will monitor the water quality parameters of the following intrinsic bioremediation indicators (IBIs) and allow them to stabilize during the purging process prior to sample collection: temperature, turbidity, conductivity, dissolved oxygen, pH, and oxygen reduction potential. We estimate a total purge time will be approximately 30 minutes per well.

We will collect the groundwater samples with a peristaltic or submersible bladder pump and disposable tubing and transfer the samples to the appropriate laboratory containers. New, decontaminated containers will be supplied by the laboratory prior to sample collection. Groundwater samples will be submitted for laboratory analysis of VPH and EPH screens. Samples collected during the monitoring event will also be tested for the lead scavengers 1,2-Dibromomethane and 1,2-Dichloroethane. We will collect one VPH field duplicate during the sample event. This plan accounts for half of the groundwater samples to be fractionated during the sample event. Each sample container will be preserved as directed by the laboratory, labeled, and packaged on ice. The samples will be delivered to Energy Laboratories, Inc. in Billings, Montana. Chain of custody documentation will accompany the samples.

Purge water generated during the sampling activities will be infiltrated into the grassy areas available at the site in accordance with Montana DEQ standards.

Task 4 – Reporting

Following the completion of the well installation and subsurface evaluation tasks, Pioneer will prepare an Initial Remedial Investigation Report (Report RIR-01). The report will follow the Montana DEQ Report format and will include the following:

- Facility map illustrating locations of utilities, fuel systems, soil borings, and groundwater monitoring wells.
- Tables summarizing locations/depth of field data, laboratory analytical data for soil samples, and laboratory analytical data for groundwater water samples.
- Laboratory analytical reports for soil and groundwater samples.

- Logs, field data sheets, and related field data.
- Data and recommendations relevant for further remediation and/or closure of the release.
- A Release Closure Plan.

COST ESTIMATES

The cost estimate to perform this scope of work is included in Attachment 2.

SCHEDULE

We can begin work on this project within 30 days following receipt of both Montana DEQ and Petro Board approvals, which is expected sometime in the late fall or early winter of 2020. The project, as described in this work plan, will last up to 4 months. Therefore, the final report will be issued sometime in February or March 2021.

If you have any questions about this project or the proposed scope of work, please call me at (406) 702-2430 or email me at cpeterson@pioneer-technical.com.

Sincerely,



Charles L. Peterson, P.G.
Project Manager

Attachment 1: Figures
Attachment 2: Cost Estimate

cc: Dennis Whitmore, C-Store Properties, LLC, P.O. Box 80391, Billings, MT 59108

Attachment 1

Figures

Figure 1. Location and Vicinity Map
Figure 2. Site Map



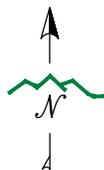
**PROJECT
LOCATION**



SITE VICINITY MAP

DEQ FACILITY ID: 56-06966
 RELEASE NUMBER: 5411
 WORK PLAN NUMBER: 34160

CONOMART SUPERSTORE #2
 411 HIGHWAY 212
 LAUREL, MONTANA 59044



DISPLAYED AS:
 COORD SYS/ZONE: NAD 83, NAVD 88
 DATUM: MSP
 UNITS: INT. FEET
 SOURCE: GOOGLE

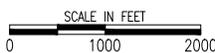


FIGURE 1



LOCATION AND
 VICINITY MAP
 CONOMART
 SUPERSTORE #2

DATE: 08-2020

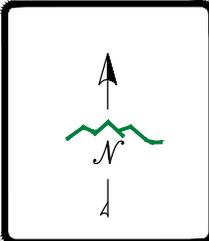


LEGEND:

PROPERTY LINE

PROPOSED BORING LOCATION

DEQ FACILITY ID: 56-06966
 RELEASE NUMBER: 5411
 WORK PLAN NUMBER: 34160



DISPLAYED AS: _____

COORD SYS/ZONE: NAD 83, NAVD 88

DATUM: MSP

UNITS: INT. FEET

SOURCE: GOOGLE

SCALE IN FEET

FIGURE 2

SITE MAP
 CONOMART
 SUPERSTORE #2

PIONEER
 TECHNICAL SERVICES, INC.
 2310 BROADWATER AVE, SUITE 1
 BILLINGS, MT 59102
 (406) 545-4805

DATE: 08-2020

Attachment 2

Cost Estimate

