



October 22, 2020

To Whom It May Concern:

The Department of Environmental Quality (DEQ) is accepting public comments specific to new underground storage tanks to be installed near Townsend, Montana at the proposed Rocky Mountain Supply.

DEQ has prepared the following Environmental Assessment (EA) as required by the Montana Environmental Policy Act (sections ARM 17.4.607(2) and ARM 17.4.609(2)). This project involves installing one 20,000 single-compartment Plasteel Elutron Clad FRP double-walled Underground Storage Tank (UST) containing regular unleaded gasoline, one 20,000 single-compartment Plasteel Elutron Clad FRP double-walled UST containing clear diesel # 2, one 14,000 dual-compartment Plasteel Elutron Clad FRP double-walled UST containing premium gasoline (8,000-gallon compartment) and non-ethanol premium gasoline (6,000-gallon compartment), one 14,000 dual-compartment Plasteel Elutron Clad FRP double-walled UST containing road master diesel (8,000-gallon compartment) and clear diesel # 1 (6,000-gallon compartment), and one 14,000 dual-compartment Plasteel Elutron Clad FRP double-walled UST containing off-road dyed diesel (6,000-gallon compartment) and non-regulated Diesel Exhaust Fluid (DEF) (6,000-gallon compartment). All the UST systems will utilize secondarily contained Franklin Fueling Systems APT XP double-walled flexible pipe. The proposed project will add seven (7) new UST systems to the newly developed Rocky Mountain Supply, located at 7857 US Highway 287, Townsend, MT 59644.

Specific installation plans include the following materials and monitoring systems: **Tank(s):** This project involves installing the following seven (7) tanks: 20,000-gallon regular unleaded gasoline, 20,000-gallon clear diesel # 2, 8,000-gallon ethanol premium gasoline, 6,000-gallon non-ethanol premium gasoline, 8,000-gallon road master diesel, 6,000-gallon clear diesel # 1, 8,000-gallon off-road dyed diesel, and a 6,000 gallon non-regulated DEF tank. All seven tanks will be Plasteel Elutron Clad Fiberglass Reinforced Plastic (FRP) double-walled UST systems. Each tank will be utilized by Rocky Mountain Supply as a petroleum re-fueling site and convenience store. **Piping:** All product piping associated with this project will be Franklin Fueling Systems APT XP secondary contained double-walled flexible pipe. Approximately 1,200 feet of double-walled Franklin Fueling Systems APT XP piping will be utilized in this project. **Sumps:** Single-walled fiberglass tank-top sumps will be installed around each tank's submersible turbine pump. Franklin Fueling Systems Large Mouth APT polyethylene under-dispenser containment sumps will be installed under each dispenser. Each tank and piping system will be continuously monitored. Monitoring will be accomplished via internal tank probes, interstitial tank sensors, as well as continuous sensor monitoring in all containment sumps and electronic line leak detection with programmed 0.2 gph shutdown rate for each of the piping runs. A Franklin Fueling Systems EVO T5000EDP automatic tank gauge (ATG) will continuously monitor all operational parameters.

DEQ prepares EAs to examine and document the effects of a proposed action on the quality of the human and physical environment. After a ten-day public comment period, DEQ will consider the substantive comments received in response the EA and proceed with one of the following actions: a) determine that an Environmental Impact Statement (EIS) is necessary; b) determine that the EA did not adequately reflect issues raised by the proposed action and issue a revised EA; or c) determine that further environmental analysis is not necessary and make a final decision on the proposed action with any modification deemed necessary as a result of analysis in the EA and public comment.

If you care to comment on this proposed project or the attached EA, please write or email the Waste Management and Remediation Division. Comments must be in writing and must be received by November 11, 2020. Our email address is dequstprogram@mt.gov and our mailing address is DEQ/UST, PO Box 200901, Helena, MT 59620-0901.

Sincerely,

Seth Hendrix, Environmental Science Specialist
Underground Storage Tank Section
Waste and Underground Tank Management Bureau
Enc: Environmental Assessment

O/O NAME: Rocky Mountain Supply	FACILITY NO: 60-15352
PERMIT NO: 21-0087	DATE OF APPLICATION: September 3, 2020
PERSON PREPARING EA: Seth Hendrix	COUNTY: Broadwater
LOCATION: 7857 US Highway 287, Townsend, MT 59644	
FACILITY NAME: Rocky Mountain Supply	EA COMPLETED: 10/22/2020
<p>DESCRIPTION OF PROPOSED ACTION: Tank(s): This project involves installing the following seven (7) tanks: 20,000-gallon regular unleaded gasoline, 20,000-gallon clear diesel # 2, 8,000-gallon ethanol premium gasoline, 6,000-gallon non-ethanol premium gasoline, 8,000-gallon road master diesel, 6,000-gallon clear diesel # 1, 8,000-gallon off road dyed diesel, and a 6,000 gallon non-regulated DEF tank. All seven tanks will be Plasteel Elutron Clad Fiberglass Reinforced Plastic (FRP) double-walled UST systems. Each tank will be utilized by Rocky Mountain Supply as a petroleum re-fueling site and convenience store. Piping: All product piping associated with this project will be Franklin Fueling Systems APT XP secondary contained double-walled flexible pipe. Approximately 1,200 feet of double-walled Franklin Fueling Systems APT XP piping will be utilized in this project. Sumps: Single-walled fiberglass tank-top sumps will be installed around each tank's submersible turbine pump. Franklin Fueling Systems Large Mouth APT polyethylene under-dispenser containment sumps will be installed under each dispenser. Each tank and piping system will be continuously monitored. Monitoring will be accomplished via internal tank probes, interstitial tank sensors, as well as continuous sensor monitoring in all containment sumps and electronic line leak detection with programmed 0.2 gph shutdown rate for each of the piping runs. A Franklin Fueling Systems EVO T5000EDP automatic tank gauge (ATG) will continuously monitor all operational parameters.</p> <p>Products to be stored: Regular Unleaded Gasoline, Premium Gasoline, Non-Ethanol Premium Gasoline, Diesel # 1, Diesel # 2, Off-Road Dyed Diesel, and Diesel Exhaust Fluid.</p>	
<p>DESCRIPTION OF THE BENEFITS AND PURPOSE OF THE PROPOSED ACTION: Purpose is to install seven (7) new petroleum UST systems for storing and dispensing gasoline, diesel, and off-road diesel at Rocky Mountain Supply, creating a new petroleum re-fueling station. The benefits include efficient access to fuel. Non-regulated Diesel Exhaust Fuel (DEF) will also be available.</p>	

- A: Significant unavoidable impacts
- B: Potential significant impacts mitigated based upon license conditions
- C: Insignificant as proposed

PHYSICAL ENVIRONMENT	POTENTIAL IMPACTS					
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
1. TOPOGRAPHY: Are there unusual geologic features? Will the surface features be changed?			X			The proposed site is currently a relatively flat and bare lot located just north of Mostad Drive and directly west of US Highway 287 outside of Townsend, Montana. The physical address of the site is 7857 US Highway 287, Townsend, MT. The site is currently a 6.64-acre bare lot and is located directly south of Watson Irrigation outside of Townsend. The owner will be applying for a Broadwater County Building permit application. The Building Permit application will include a convenience store plus canopy and fueling station. The permit application will include a

PHYSICAL ENVIRONMENT	POTENTIAL IMPACTS					
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
						<p>parking lot. Soil disturbances and storm water runoff during construction will be regulated under MPDES Authorization. A General Permit for Storm Water Discharges Associated with Construction Activity will be issued (MTR100000) by Montana DEQ Water Protection Bureau. The owner will also apply for Infrastructure improvements such as water distribution (water service line), sewer systems (sewer service line), lighting plan, landscape site plan, irrigation plan, refuse enclosure plan, convenience store building, and canopy. There are no known or reported unusual geologic features. The tanks and all the associated product piping will be buried underground, while appurtenant equipment is above ground. The general topography will not change. Surface features will be consistent with retail petroleum re-fueling facilities.</p>

<p>2. <u>GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE</u>: Are fragile, compactable or unstable soils present? Are there special reclamation considerations?</p>			X			<p>There are no known special reclamation considerations for the project site, nor were any fragile or unstable soils identified to the reviewer. The owner will be applying for a Broadwater County Building permit application. The Building Permit application will include a convenience store plus canopy and fueling station. The permit application will include a parking lot. Soil disturbances and storm water runoff during construction will be regulated under MPDES Authorization. A General Permit for Storm Water Discharges Associated with Construction Activity will be issued (MTR100000) by Montana DEQ Water Protection Bureau. The owner will also apply for Infrastructure improvements such as water distribution (water service line), sewer systems (sewer service line), lighting plan, landscape site plan, irrigation plan, refuse enclosure plan, and canopy.</p>
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					<p>Montana DEQ Federal Superfund Program does not have a project on this project site.</p> <p>Soil disturbances and storm water runoff during construction are regulated under MPDES Authorization. A General Permit for Storm Water Discharges associated with construction activity will be issued.</p>
3.	<p><u>WATER QUALITY, QUANTITY AND DISTRIBUTION:</u> Are important surface or groundwater resources present? Is there potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality?</p>	X			<p>Important water resources are present at the proposed location. There are 53 public and private water wells located within 1 mile of the proposed site. The Missouri River is located within 3,590 feet of the proposed site. Deep Creek is located within 1.51 miles of the proposed site. Greyson Creek is located within 3.43 miles of the proposed site.</p> <p>There is no significant surface water within 3.61 miles of the proposed underground storage tank installation. The proposed site lies within the City of Townsend-Missouri River watershed.</p> <p>Soil disturbances and storm water runoff during construction are regulated under MPDES Authorization. A General Permit for Storm Water Discharges associated with construction activity will be issued.</p> <p>Protection of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality is mitigated by secondarily contained non-corroding underground tanks/piping and continuous system monitoring.</p> <p>Proper operation of this system would significantly decrease the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, and the degradation of water quality. Secondary containment and leak detection systems serve to mitigate the potential impacts by immediately reducing the amount of fuel available for release to the environment and by making early detection of releases possible.</p>
4.	<p><u>AIR QUALITY:</u> Will pollutants or particulate be produced? Is the project influenced by air quality regulations or zones (Class I airshed)?</p>		X		<p>Petroleum vapors will be mitigated by natural air currents, submerged fill pipes, stage-one vapor recovery system and vapory recovery vent pipes will control hydrocarbon vapors.</p>

						The proposed project site is not located in a Class I airshed. The closest Class I airshed is located at least 43 miles away from the project site (Gates of the Mountains Wilderness)
5. <u>DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY</u> : Will the project use resources that are limited in the area? Are there other activities nearby that will affect the project?			X			This project will not use existing environmental resources in the local area. There are no other nearby activities identified to the reviewer that may be impacted.
6. <u>IMPACTS ON OTHER ENVIRONMENTAL RESOURCES</u> : Are there other studies, plans or projects on this tract?		X				<p>The owner will be applying for a Broadwater County Building permit application. The Building Permit application will include a convenience store plus canopy and fueling station. The permit application will include a parking lot. Soil disturbances and storm water runoff during construction will be regulated under MPDES Authorization. A General Permit for Storm Water Discharges Associated with Construction Activity will be issued (MTR100000) by Montana DEQ Water Protection Bureau. The owner will also apply for Infrastructure improvements such as water distribution (water service line), sewer systems (sewer service line), lighting plan, landscape site plan, irrigation plan, refuse enclosure plan, convenience store building, and canopy.</p> <p>Montana DEQ Federal Superfund Program does not have a project on this project site. There are no other known environmental studies or projects on this land.</p>
7. <u>TERRESTRIAL, AVIAN, AND AQUATIC LIFE AND HABITATS</u> : Is there substantial use of the area by important wildlife, birds or fish?			X			No known use of this project site by important wildlife, birds, or fish has been identified to the reviewer. The project site is not in the core, general, or connective sage grouse habitat areas as designated by the Montana Sage Grouse Habitat Conservation Program. There are no listed United States Fish Wildlife Service Critical Habitat areas located within 38.0 miles of the proposed site. Critical Canada Lynx habitat found in the Helena National Forest is 38.0 miles away from the proposed site. Critical Bull Trout habitat found on the Clark Fork River is 58.5 miles away from the proposed site.
8. <u>VEGETATION COVER, QUANTITY AND QUALITY</u> : Will vegetative communities be			X			Montana Cadastral lists this property, which was owned by Breker Douglas J, as Property Type RP – Residential

<p>permanently altered? Are any rare plants or cover types present?</p>					<p>Property. The department received notification that this property is now owned by Rocky Mountain Supply Inc. Three small parcels will be integrated into one and the project area will be changed to commercial property. The native vegetative communities have been altered previously and most of the project area is a bare lot. The location currently is surrounded by a few small-scale businesses and a few private residential properties are in the vicinity. Most of the surrounding area is agriculture land. No rare plants or cover types are reported to this reviewer.</p>
<p>9. <u>UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES:</u> Are any federally listed threatened or endangered species or identified habitat present? Any wetlands? Any species of special concern?</p>			X		<p>The project site is not in the core, general, or connective sage grouse habitat areas as designated by the Montana Sage Grouse Habitat Conservation Program. There are five endangered species listed for Broadwater County: Ute Ladies' Tresses, Canada Lynx, Grizzly Bear, Wolverine, and Whitebark Pine. There are 44 animal species of concern and 14 plant species of concern identified in Broadwater County. There are Riverine Wetland Habitats located within 3,320 feet of the project site.</p>
<p>10. <u>HISTORICAL AND ARCHEOLOGICAL SITE:</u> Are any historical, archeological or paleontological resources present?</p>			X		<p>The National Register of Historic Places lists nine (9) National Historic Landmarks in Broadwater County. There are no listed structures at the project site. There are no known archeological or paleontological resources reported to the reviewer. Should structures over 50 years old need to be altered or if cultural materials are discovered during this project, Montana SHPO requests that the alteration and/or discovery be promptly reported, and the site investigated.</p>

<p>11. <u>AESTHETICS:</u> Is the project on a prominent topographical feature? Will it be visible from populated or scenic areas? Will there be excessive noise, light or odors?</p>		X			<p>Rocky Mountain Supply will be visible from Highway 287 and Mostad Drive and will be located directly south of Watson Irrigation Specialist outside of Townsend. The property is 1,630 feet south of the City of Townsend southern boundary line. The proposed project, (underground storage tank installation) storage tanks and piping will be buried underground. Appurtenant above ground equipment will be visible but is consistent with the existing character of the adjacent commercial properties. Other neighboring existing businesses include Watson Irrigation Specialist,</p>
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						Town & Ranch True Value Hardware, Townsend Electric, Townsend Marine, Hedstrom Complete Auto repair Inc, Family Dollar, United States Postal Service, US Forest Service Townsend Ranger District, Bar Gulch Cabin, Rocky Mountain Supply Townsend (existing UST facility), and Bob's Supermarket.
12. <u>AGRICULTURE</u> : Will grazing lands, irrigation waters or crop production be affected?			X			The property's 6.64-acre residential property (vacant lot) status will change to commercial property. No significant impacts to agricultural lands are anticipated by this project. New developments are currently being planned.
HUMAN ENVIRONMENT						
1. <u>SOCIAL STRUCTURES AND MORES</u> : Is some disruption of native or traditional lifestyles or communities possible?		X				It is not anticipated that the project will disrupt native or traditional lifestyles or communities.
2. <u>CULTURAL UNIQUENESS AND DIVERSITY</u> : Will the action cause a shift in some unique quality of the area?			X			It is not anticipated that the project will cause a shift in any cultural uniqueness and diversity of the area.
3. <u>DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING</u> : Will the project add to the population and require additional housing?			X			It is not anticipated that the project (underground tank installations) will add to the population or require additional housing. The project result (convenience store) has limited potential to add to the population and require additional housing.
4. <u>HUMAN HEALTH & SAFETY</u> : Will this project add to health and safety risks in the area?		X				It is anticipated that natural air currents and tank vents will dissipate hydrocarbon vapors to a safe level. Leak detection equipment is designed to detect releases before serious health or safety problems occur. Proper operation of leak detection systems and operating requirements mitigate potential risks by making early detection of releases possible and by immediately reducing the amount of fuel available to be released into the environment, where it could impact health and human safety.
5. <u>COMMUNITY & PERSONAL INCOME</u> : Will the facility generate or degrade income?		X				The project result (convenience store) is anticipated to have limited potential to generate community and personal income in the local area.
6. <u>QUANTITY AND DISTRIBUTION OF EMPLOYMENT</u> : Will the project create, move or eliminate jobs? If so, estimate jobs.		X				It is not anticipated that this underground storage tank installation project will create or eliminate permanent jobs. However, the project result (convenience store) is reported to have the potential to create (2) full time or part time positions associated

						with the new re-fueling facility. During the underground storage tank construction of the facility, there will be minimal temporary jobs created.
7.	<u>LOCAL AND STATE TAX BASE REVENUES:</u> Will the project create or eliminate tax revenue?		X			It is anticipated that the re-fueling station and convenience store associated with this proposal will generate additional local and state tax revenue.
8.	<u>DEMAND FOR GOVERNMENT SERVICES:</u> Will substantial traffic be added to existing roads? Will other services (fire protection, police, schools, etc.) be needed?		X			It is anticipated that the result of this proposed project will add to the local traffic flow around Highway 287, and Mostad Drive, south of Townsend. An increase in law enforcement activities (increased calls and routine patrols) in the area may be necessary.
9.	<u>INDUSTRIAL, COMMERCIAL AND AGRICULTURAL ACTIVITIES AND PRODUCTION:</u> Will the project add to or alter these activities?			X		No significant impacts to adjacent commercial or agricultural activities are anticipated that are related to this project.
10.	<u>ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES:</u> Are wilderness or recreational areas nearby or accessed through this tract? Is there recreational potential within the tract?			X		Designated USFS National Forest recreational property is located within 17 miles (Helena National Forest) of the project site, but is not accessed through the project location. Indian Road Campground, located at the southern end of Canyon Ferry Lake, is 2.4 miles north of the proposed site. Silos Recreation Area, located on the shore of Canyon Ferry Lake, is 9.8 miles north of the proposed site. Crimson Bluffs Trail Head is located 4.7 miles southwest of the proposed site. Toston Dam Campground is located 16.6 miles southeast of the proposed site. Old Baldy Golf Course is 2.7 miles east of the proposed site. No designated recreational properties are located within the project area. It is not anticipated that this project site has recreational potential.

<p>11. <u>AESTHETICS</u>: Is the project on a prominent topographical feature? Will it be visible from populated or scenic areas? Will there be excessive noise, light or odors?</p>			X		<p>Rocky Mountain Supply will be visible from Highway 287 and Mostad Drive and will be located directly south of Watson Irrigation Specialist outside of Townsend. The property is 1,630 feet south of the City of Townsend south boundary line. The proposed underground storage tank project will result in buried underground storage tanks and piping that will not be visible above ground. Appurtenant above ground equipment will be visible. It is not anticipated that this project will change the aesthetics of the area significantly. The result of the project (re-fueling station and convenience store) is consistent with the aesthetics of other properties in the area.</p>
<p>12. <u>LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS</u>: Are there state, county, city, USFS, BLM, tribal, etc., zoning or management plans in effect?</p>			X		<p>The owner will be applying for a Broadwater County Building permit application. The Building Permit application will include a convenience store plus canopy and fueling station. The permit application will include a parking lot. Soil disturbances and storm water runoff during construction will be regulated under MPDES Authorization. A General Permit for Storm Water Discharges Associated with Construction Activity will be issued (MTR100000) by Montana DEQ Water Protection Bureau. The owner will also apply for Infrastructure improvements such as water distribution (water service line), sewer systems (sewer service line), lighting plan, landscape site plan, irrigation plan, refuse enclosure plan, convenience store building, and canopy.</p> <p>Montana DEQ Federal Superfund Program does not have a project on this project site.</p> <p>There are no known local, county, state, or federal environmental management plans that would impact this project development. The proposed project and associated development is expected to be in conformance with current Broadwater County and State of Montana zoning requirements.</p>
<p>13. <u>TRANSPORTATION</u>: Will the project affect local transportation networks and traffic flow?</p>		X			<p>This project is expected to affect immediately adjacent local transportation networks. Increased vehicle traffic will occur near and on the proposed site.</p>

PUBLIC INVOLVEMENT: The department has attempted to identify parties who may be interested in this proposed project and to provide the opportunity for public comment. A copy of this Environmental Assessment has been posted on our website at <http://deq.mt.gov/Land/ust/ea>. Substantive comment may be provided to our email address at dequstprogram@mt.gov.

ALTERNATIVES CONSIDERED: No other alternatives were presented or considered.

COMPLIANCE STATUS: This project, as permitted, will be in compliance with the UST regulations. The facility must, however, be operated and maintained in accordance with the UST rules and regulations. This facility is required to have a compliance inspection done within 120 days of the installation of the tank systems.

RECOMMENDATIONS CONCERNING PREPARATION OF AN EIS: Not necessary at this time, based upon the information reviewed. The project, as proposed with mandatory operating and permit conditions, will not have a significant environmental impact.

OTHER GROUPS OR AGENCIES CONTACTED, OR WHICH MAY HAVE OVERLAPPING JURISDICTION: The Montana Department of Natural Resources and Conservation, The Montana Department of Justice, and the State Fire Marshall's Office.

INDIVIDUALS OR GROUPS CONTRIBUTING TO THIS EA: The owner, the contractor, and the preparer of this EA.

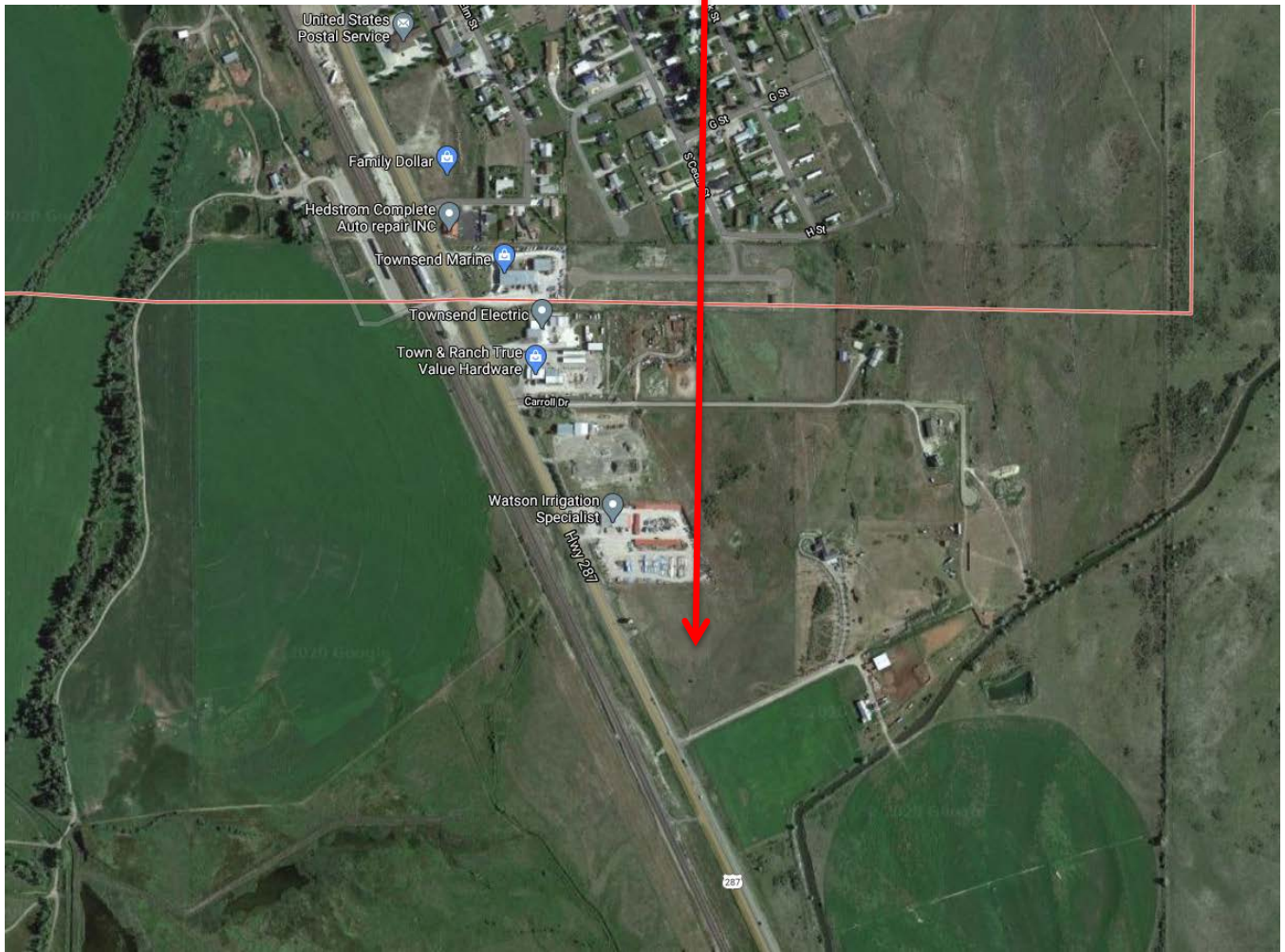
PERMIT CONDITION EFFECTS: Permit conditions are based on Montana and federal regulations, PEI RP100-2000 and accepted standard engineering practices.

cc: Governor's Office
Legislative Environmental Policy Office

General Location of Project Site: ~ 1,630 feet south of Townsend



Detailed Project Site Location: Proposed Rocky Mountain Supply



Proposed Project Site Physical Address: 7857 US Highway 287, Townsend, MT 59644

Close-up Project Site Location: Proposed Rocky Mountain Supply



Proposed Project Site Physical Address: 7857 US Highway 287, Townsend, MT 59644