



June 14, 2018

To Whom It May Concern:

The Department of Environmental Quality (DEQ) is accepting public comments on new underground storage tanks to be installed in Helena, Montana.

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 30,000-gallon single-compartment Plasteel Elutron Fiberglass Reinforced Plastic (FRP) jacketed steel double-walled Underground Storage Tank (UST) containing regular unleaded gasoline; one 30,000 triple-compartment Plasteel Elutron FRP jacketed steel double-walled UST containing premium unleaded gasoline (9,000-gallons), non-ethanol premium unleaded gasoline (9,000-gallons), and clear diesel (12,000-gallons). All of the UST systems will utilize secondarily contained Franklin Fueling Systems APT XP double-walled flexible plastic piping. The proposed project will add four new UST systems for the newly-developed Mountain View Coop Helena site, located at 720 Custer Ave., Helena, MT 59602.

Specific installation plans include the following materials and monitoring systems: Tank(s): This project involves installing the following four (4) tanks: 30,000-gallon regular unleaded gasoline, 9,000-gallon premium unleaded gasoline, 9,000-gallon non-ethanol premium unleaded gasoline, and 12,000-gallon clear diesel. All four tanks will be Elutron Fiberglass Reinforced Plastic (FRP) jacketed steel double-walled UST systems. All tanks will be utilized by Mountain View Coop Helena as a petroleum re-fueling site and convenience store. Piping: All product piping associated with this project will be Franklin Fueling Systems APT XP double-walled flexible plastic pipe. Approximately 875 feet of double-walled Franklin Fueling Systems APT XP flexible plastic piping will be utilized in this project. Sumps: Franklin Fueling Systems APT model TSM-W-4736 one-piece polyethylene tank top containment sumps will be installed around each tank's submersible turbine pump. APT model LMM-3617 fiberglass large-mouth under-dispenser containment sumps will be installed under all dispensers. Each tank and piping system will be continuously monitored. Monitoring will be accomplished via internal tank probes and interstitial tank sensors, as well as continuous sensor monitoring in all containment sumps and electronic line leak detection for each of the piping runs. A Franklin Fueling Systems TS 550 EVO automatic tank gauge (ATG) will continuously monitor all operational parameters.

DEQ prepares EAs to inform interested government agencies, public groups, or individuals of a proposed action and to determine whether the action may have a significant effect on human health or the natural environment. After a ten-day public comment period, DEQ will decide what action to take regarding this proposed project.

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 June 27, 2018. Our email address is dequstprogram@mt.gov and our mailing address is 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: Mountain View Coop	FACILITY NO: 60-15323
PERMIT NO: 18-0136	DATE OF APPLICATION: May 10, 2018
PERSON PREPARING EA: Seth Hendrix	COUNTY: Lewis & Clark
LOCATION: 720 Custer Ave., Helena, MT 59602	
FACILITY NAME: Mountain View Coop Helena	EA COMPLETED: 6/14/2018
<p>DESCRIPTION OF PROPOSED ACTION: This project involves installing the following four (4) tanks: 30,000-gallon regular unleaded gasoline, 9,000-gallon premium unleaded gasoline, 9,000-gallon non-ethanol premium unleaded gasoline, and 12,000-gallon clear diesel. All four tanks will be Elutron Fiberglass Reinforced Plastic (FRP) jacketed steel double-walled UST systems. All tanks will be utilized by Mountain View Coop Helena as a petroleum re-fueling site and convenience store. Piping: All product piping associated with this project will be Franklin Fueling Systems APT XP double-walled flexible plastic pipe. Approximately 875 feet of double-walled Franklin Fueling Systems APT XP flexible plastic piping will be utilized in this project. Sumps: Franklin Fueling Systems APT model TSM-W-4736 one-piece polyethylene tank top containment sumps will be installed around each tank's submersible turbine pump. APT model LMM-3617 fiberglass large-mouth under-dispenser containment sumps will be installed under all dispensers. Each tank and piping system will be continuously monitored. Monitoring will be accomplished via internal tank probes and interstitial tank sensors, as well as continuous sensor monitoring in all containment sumps and electronic line leak detection for each of the piping runs. A Franklin Fueling Systems TS 550 EVO automatic tank gauge (ATG) will continuously monitor all operational parameters.</p> <p>Products to be stored: Regular Unleaded Gasoline, Premium Unleaded Gasoline, Non-ethanol Premium Unleaded Gasoline, and Clear Diesel.</p> <p>DESCRIPTION OF THE BENEFITS AND PURPOSE OF THE PROPOSED ACTION: Purpose is to install seven new petroleum UST systems for storing and dispensing gasoline, diesel, and diesel exhaust fluid at Mountain View Coop, creating a new petroleum re-fueling station. The benefits include efficient access to fuel.</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. <u>TOPOGRAPHY:</u> Are there unusual geologic features? Will the surface features be changed?			X			The project location is a collection of two lots that previously contained a theme park/amusement park. Previous use included an amusement park, climbing wall, and go cart track. All buildings on these two lots will be removed. The proposed site is mostly a flat lot with a few small buildings located at 720 W Custer Ave., Helena, MT 59602. There are no known or reported unusual geologic features. The tanks and all the 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>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.</p>
<p>3. <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 this proposed location. There are approximately 50 public and private water wells within 1 mile of the proposed site. Ten Mile Creek is located within 1.15 miles of the proposed site.</p> <p>There is no surface water within 1,700 feet of the proposed underground storage tank installation. The proposed site lies within the Lower Ten Mile Creek watershed.</p> <p>Potential violation 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>Improper operation of this system would increase the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, and the degradation of water quality. Secondarily containment and leak detection systems serve to mitigate the potential impacts by immediately reducing the amount of fuel available for release to the environment.</p>
<p>4. <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 released at this site. Natural air currents, submerged fill pipes, stage one vapor recovery system and vapory recovery vent pipes will control hydrocarbon vapors.</p> <p>The proposed project site is not located in a Class I airshed. The closest Class I airsheds are located at least 25 miles away from the project site (Gates of the Mountains Wilderness, Scapegoat Wilderness, and the Bob Marshall Wilderness)</p>
<p>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?</p>			X		<p>This project will not use existing environmental resources in the local area. There is no other nearby activities identified to the reviewer that may be impacted.</p>

6.	<u>IMPACTS ON OTHER ENVIRONMENTAL RESOURCES:</u> Are there other studies, plans or projects on this tract?			X		There are no other known environmental studies or projects on this land.
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. There are no listed Critical Habitat areas located within 9.5 miles of this proposed site.
8.	<u>VEGETATION COVER, QUANTITY AND QUALITY:</u> Will vegetative communities be permanently altered? Are any rare plants or cover types present?			X		Montana Cadastral lists this property, owned by Mountain View Coop., as Property Type IMP_U – Improved Property Urban. The property subcategory is listed as commercial property. The location currently has several large and small-scale businesses and residential areas in the vicinity. No rare plants or cover types are reported to this reviewer.
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?			X		There are six endangered species listed for Lewis & Clark County: Grizzly Bear, Canada Lynx, Bull Trout, Red Knot, Wolverine, and Whitebark Pine. There are 61 animal species of concern and 37 plant species of concern identified in Lewis & Clark County. There is Riverine Wetland Habitats located within 1.15 miles of the project site.
10.	<u>HISTORICAL AND ARCHEOLOGICAL SITE:</u> Are any historical, archeological or paleontological resources present?			X		The National Register of Historic Places lists 77 National Historic Landmarks in Lewis & Clark County. There are no listed structures at the project site. There are no known archeological or paleontological resources reported to the reviewer.
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?		X			This proposed project is aesthetically compatible with the land use of the project site. Tanks and piping will be buried underground. Appurtenant above ground equipment will be visible but it is consistent with the existing character of the adjacent commercial urban land properties.
12.	<u>AGRICULTURE:</u> Will grazing lands, irrigation waters or crop production be affected?			X		The property's commercial urban status will not change. No significant impacts to agricultural lands are anticipated by this project.

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 unique quality 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 (re-fueling station) 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. Improper operation of this system could impact human health and safety. Leak detection systems and operating requirements mitigate this potential impact 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 (re-fueling station and 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 project will create or eliminate jobs. However, the project result (convenience store) is reported to have the potential to create (2) full time positions associated with the new re-fueling facility. During the construction of the facility there will be several 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 on Custer Avenue in Helena. Other required services will be minimally impacted as a result of this project.

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			Mt Helena Park is located over 2 miles south of the proposed project site. Spring Meadow Lake State Park is located 2 miles west of the project site. There is no National Forest located within 3.5 miles of this proposed site. No designated USFS recreational properties are located within the project area. It is not anticipated that this project site has recreational potential.
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?			X			Tanks and piping are to be buried underground. 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.
12. <u>LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS</u> : Are there state, county, city, USFS, BLM, tribal, etc., zoning or management plans in effect?			X			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 City of Helena and Lewis & Clark County zoning requirements.
13. <u>TRANSPORTATION</u> : Will the project affect local transportation networks and traffic flow?			X			This project is expected to minimally affect immediately adjacent local transportation networks.

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://deg.mt.gov/Land/ust/ea> . Substantive comment may be provided to our email address at degustprogram@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.

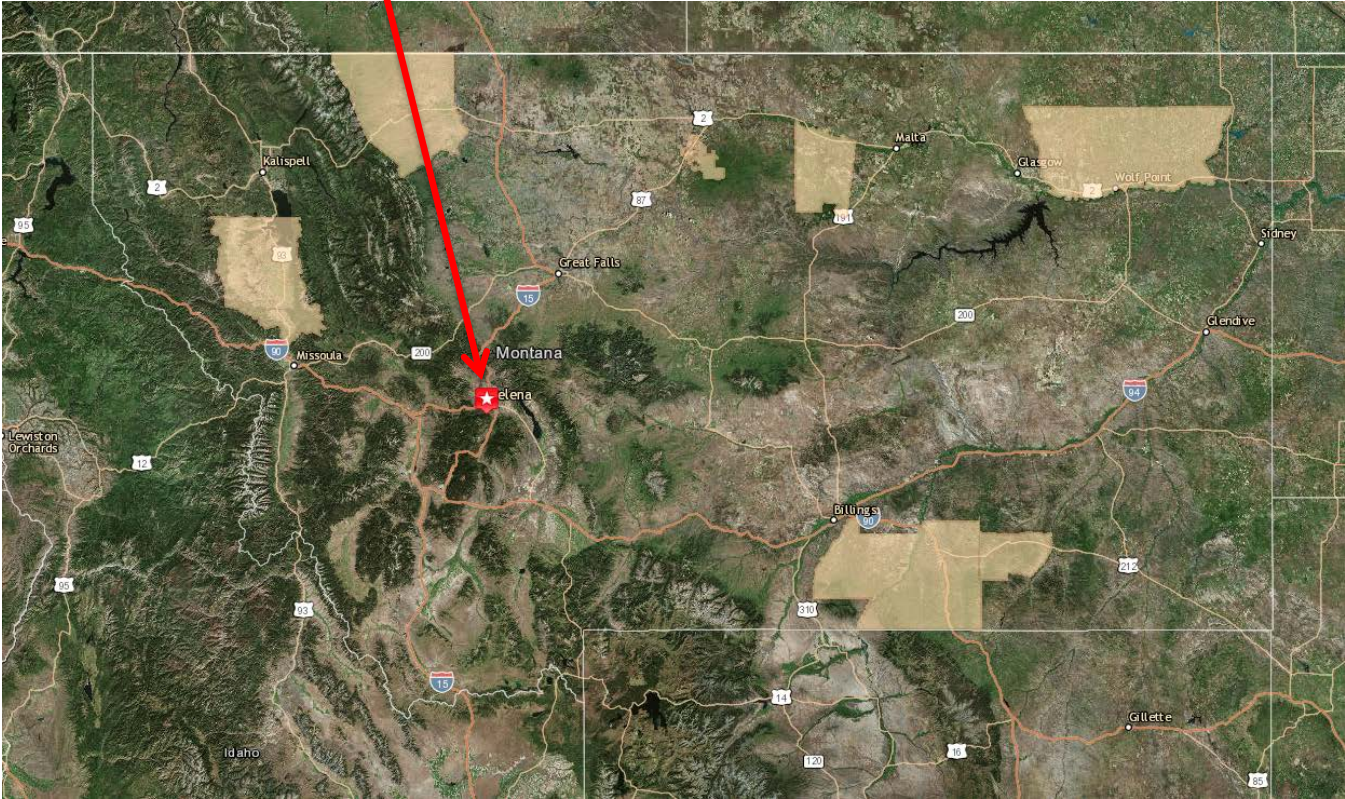
OTHER GROUPS OR AGENCIES CONTACTED OR WHICH MAY HAVE OVERLAPPING JURISDICTION: The Montana Department of Natural Resources and Conservation, The Montana Department of Justice, and the State Fire Marshall's Office.

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

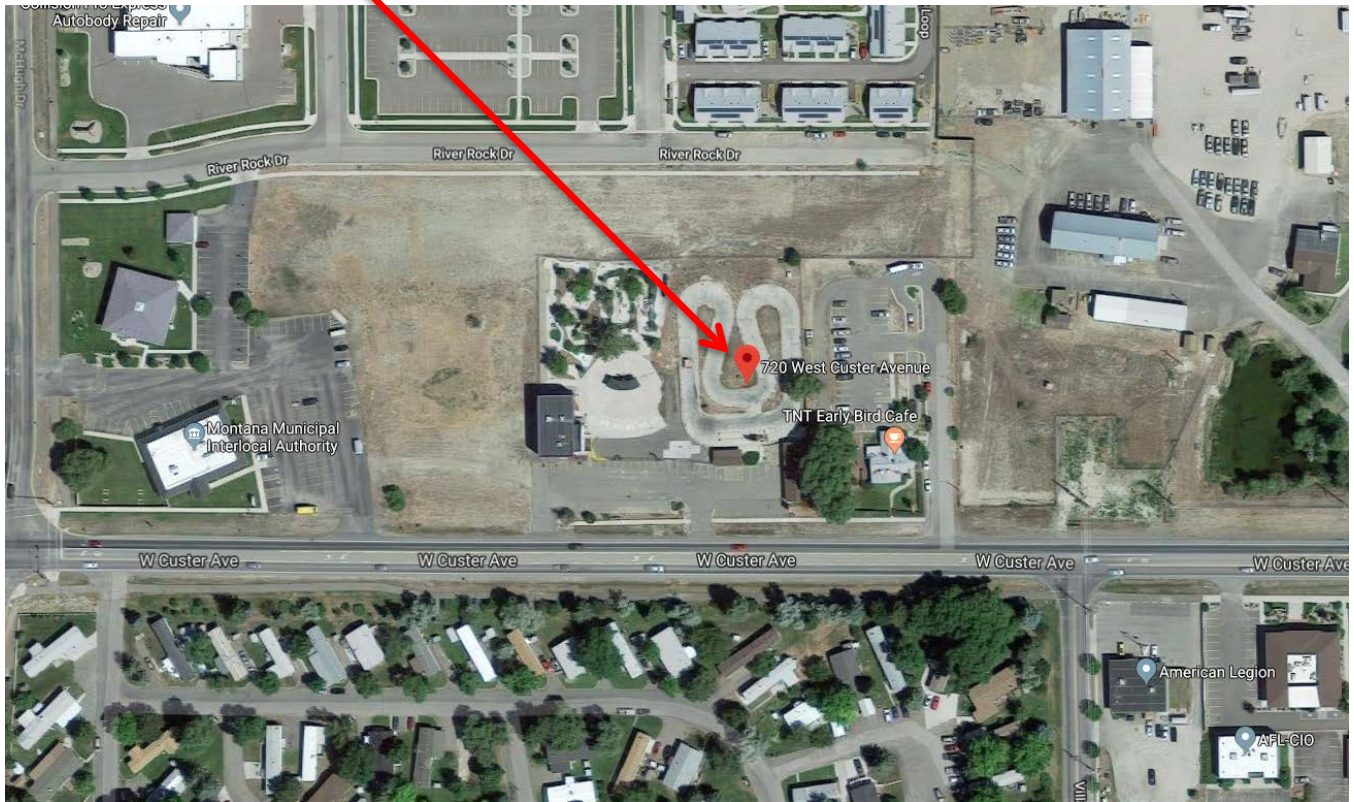
PERMIT CONDITION EFFECTS: Permit conditions are based on Montana and federal regulations, PEI RP100-2000 and accepted standard engineering practices.

cc: Governor's Office
Legislative Environmental Policy Office

General Location of Project Site:



Detailed Project Site Location: Proposed Mountain View Coop Helena Site



Proposed Project Site Physical Address: 720 W Custer Avenue, Helena, MT 59602