



November 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 Billings, 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 Xerxes Fiberglass Reinforced Plastic (FRP) double-walled Underground Storage Tank (UST) containing regular unleaded gasoline; one 29,000 triple-compartment Xerxes FRP double-walled UST containing off-road dyed diesel (7,000-gallons), E 10 premium unleaded gasoline (15,000-gallons), and non-ethanol premium gasoline (7,000-gallons), and one 27,000-gallon dual-compartment Xerxes Fiberglass Reinforced Plastic (FRP) double-walled Underground Storage Tank (UST) containing Diesel # 1 (7,000 gallons) and Diesel # 2 (20,000 gallons). All the UST systems will utilize secondarily contained Nupi Americas double-walled flexible electro fusion piping. The proposed project will add six new UST systems for the newly-developed Town Pump Billings # 12 site, located at 3415 Grand Avenue, Billings, MT 59102.

Specific installation plans include the following materials and monitoring systems: **Tank(s):** This project involves installing the following six (6) tanks: one single compartment 30,000-gallon E10 Regular Unleaded Gasoline brine filled, double-walled 10-foot diameter Xerxes Fiberglass Reinforced Plastic (FRP) underground storage tank, one triple compartment 29,000-gallon (7,000-gallon Off-road dyed diesel, 15,000-gallon E10 Premium Gasoline, and 7,000-gallon Non-Ethanol Premium Gasoline), brine filled, double-walled 10-foot diameter Xerxes FRP underground storage tank, and one dual-compartment 27,000-gallon (7,000-gallon Diesel # 1 and 20,000-gallon Diesel # 2), brine filled, double-walled 10-foot diameter Xerxes FRP underground storage tank. **Piping:** All product piping associated with this project will be Nupi Americas Smartflex model TSMAUXPD63B6 double-walled flexible plastic pipe. Approximately 3,400 feet of double-walled Nupi Americas Smartflex flexible plastic piping will be utilized in this project. **Sumps:** Xerxes single-wall round tank-top containment sumps will be installed around each tank's submersible turbine pump. Nupi Americas HDPE model DS3617 Encore dispenser sumps with Model SBK-3 Stabilizer bar kit 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 (ELLD) for each of the piping runs. A Veeder Root TLS 450 plus 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 November 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: Billings Opportunities LLC	FACILITY NO: 60-15328
PERMIT NO: 19-0083	DATE OF APPLICATION: October 22, 2018
PERSON PREPARING EA: Seth Hendrix	COUNTY: Yellowstone
LOCATION: 3415 Grand Ave, Billings, MT 59102	
FACILITY NAME: Town Pump Billings # 12	EA COMPLETED: 11/14/2018
<p>DESCRIPTION OF PROPOSED ACTION: This project involves installing the following six (6) tanks: one single compartment 30,000-gallon E10 Regular Unleaded Gasoline brine filled, double-walled 10-foot diameter Xerxes Fiberglass Reinforced Plastic (FRP) underground storage tank, one triple compartment 29,000-gallon (7,000-gallon Off-road dyed diesel, 15,000-gallon E10 Premium Gasoline, and 7,000-gallon Non-Ethanol Premium Gasoline), brine filled, double-walled 10-foot diameter Xerxes FRP underground storage tank, and one dual-compartment 27,000-gallon (7,000-gallon Diesel # 1 and 20,000-gallon Diesel # 2), brine filled, double-walled 10-foot diameter Xerxes FRP underground storage tank. Piping: All product piping associated with this project will be Nupi Americas Smartflex model TSMAUXPD63B6 double-walled flexible plastic pipe. Approximately 3,400 feet of double-walled Nupi Americas Smartflex flexible plastic piping will be utilized in this project. Sumps: Xerxes single-wall round tank-top containment sumps will be installed around each tank's submersible turbine pump. Nupi Americas HDPE model DS3617 Encore dispenser sump with Model SBK-3 Stabilizer bar kit 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 Veeder Root TLS 450 plus automatic tank gauge (ATG) will continuously monitor all operational parameters.</p> <p>Products to be stored: Regular Unleaded Gasoline, Off-road dyed diesel, Premium Unleaded Gasoline, Non-ethanol Premium Unleaded Gasoline, Diesel # 1, and Diesel # 2.</p>	
<p>DESCRIPTION OF THE BENEFITS AND PURPOSE OF THE PROPOSED ACTION: Purpose is to install six new petroleum UST systems for storing and dispensing Regular Unleaded Gasoline, Off-road dyed diesel, Premium Unleaded Gasoline, Non-ethanol Premium Unleaded Gasoline, Diesel # 1, and Diesel # 2 at Town Pump Billings # 12, 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. TOPOGRAPHY: Are there unusual geologic features? Will the surface features be changed?			X			The project location is a rural improved property that was formerly an agricultural field. Previous use included agriculture. The former agricultural field will be turned into commercial property and a convenience store is planned to be constructed. The proposed site is a flat lot with a few large trees located at 3415 Grand Avenue, Billings, MT 59102. 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

PHYSICAL ENVIRONMENT	POTENTIAL IMPACTS					
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION

2. <u>GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE</u> : Are fragile, compactable or unstable soils present? Are there special reclamation considerations?			X			There are no known special reclamation considerations for the project site, nor were any fragile or unstable soils identified to the reviewer.
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?		X				<p>Important water resources are present at this proposed location. There are approximately 65 public and private water wells within 1 mile of the proposed site. The Yellowstone River is located within 4.05 miles of the proposed site.</p> <p>There is no surface water located within 250 feet (Yegen Gold Club ponds) of the proposed underground storage tank installation. The proposed site lies within the Upper Yellowstone-Lake Basin Watershed. Sub-Watersheds include Yellowstone River-Blue Creek and Yellowstone River-Billings.</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>
4. <u>AIR QUALITY</u> : Will pollutants or particulate be produced? Is the project influenced by air quality regulations or zones (Class I airshed)?			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</p>

					closest Class I airshed is located 86 miles away from the project site (Yellowstone National Park)
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		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 53 miles of this proposed site (Canada Lynx critical habitat in the Beartooth Mountain Range).
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 Billings Opportunities LLC as Property Type IMP_R – Improved Property Rural. The property subcategory is listed as Non-Qualified Ag. The property will transition to commercial property with the installation of a proposed convenience store. The location currently has several large and small-scale businesses 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 two endangered species listed for Yellowstone County: Whooping Crane and Red Knot (both are bird species). There are 44 animal species of concern and 8 plant species of concern identified in Yellowstone County. There is Riverine Wetland Habitats located within 4.05 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 38 National Historic Landmarks in Yellowstone 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 rural improved agricultural status will change to commercial urban status with the installation of a new convenience store. Significant impacts to a very small section of agricultural lands are anticipated by this project. A very small section of agricultural land will be converted to commercial property.
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 (20) full- or part-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 Grand Avenue and Zimmerman Trail in Billings. 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		Yegen Golf Club is located 1,500 feet south of the proposed project site. Zimmerman Park is located 1.21 miles north of the project site. Pictograph Cave State Park is located 8.72 miles southeast of the project site. Lake Elmo State Park is located 6.90 miles northeast of the proposed site. There are no National Forests located within 38 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 Billings and Yellowstone 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.

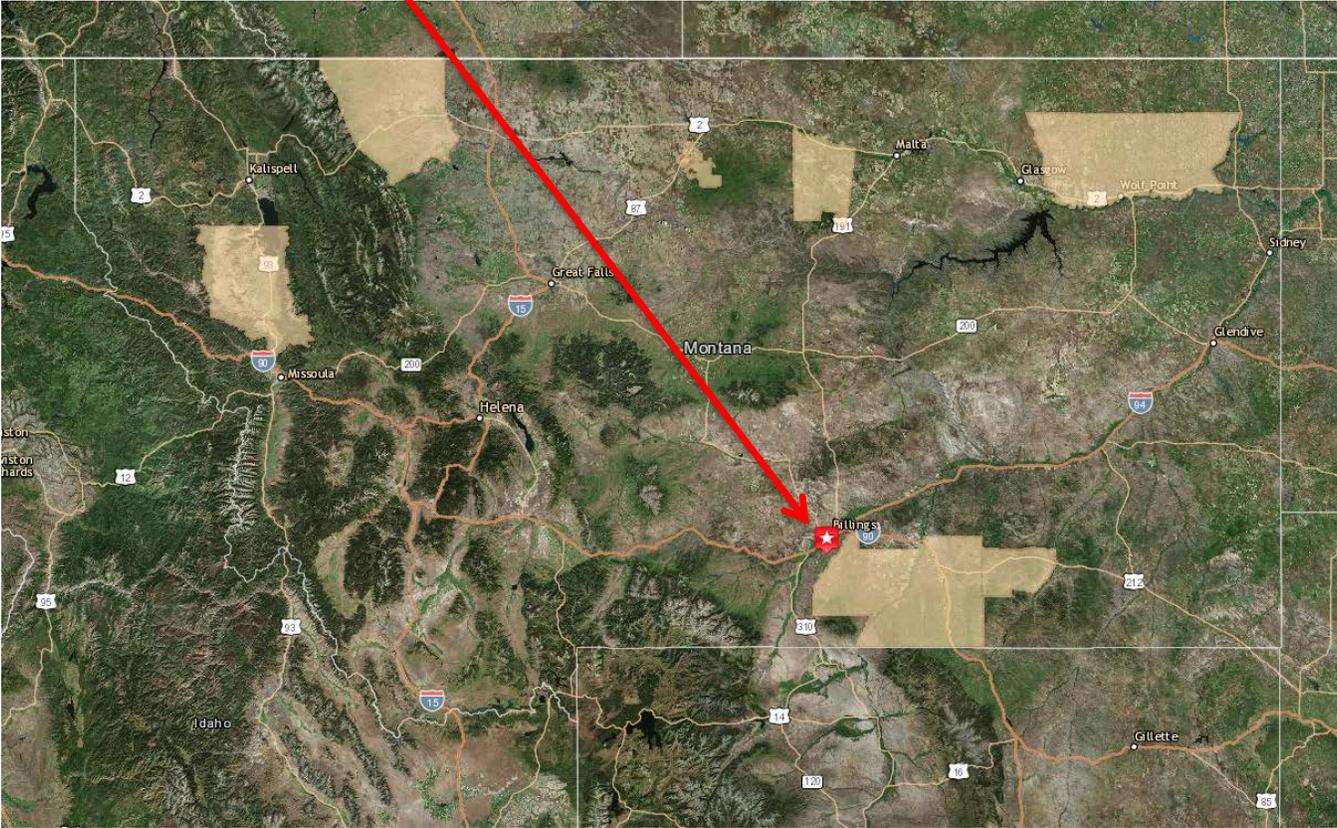
OTHER GROUPS OR AGENCIES CONTACTED OR WHICH MAY HAVE OVERLAPPING JURISDICTION: The Montana Department of Natural Resources and Conservation, The Montana Department of Justice, and the State Fire Marshall's Office.

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

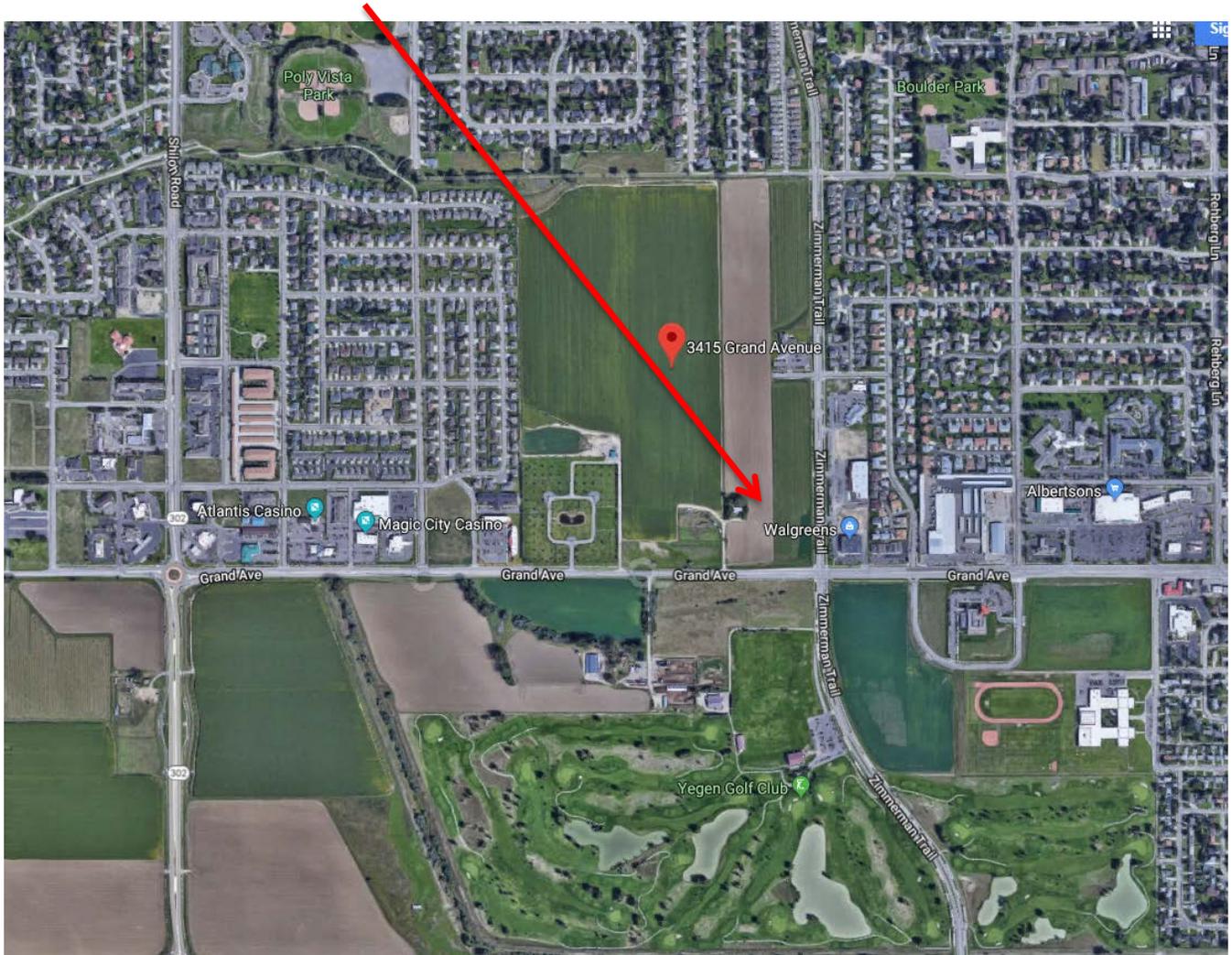
PERMIT CONDITION EFFECTS: Permit conditions are based on Montana and federal regulations, PEI RP100-2000 and accepted standard engineering practices.

cc: Governor's Office
Legislative Environmental Policy Office

General Location of Project Site:



Detailed Project Site Location: Proposed Town Pump Billings # 12 Site



Proposed Project Site Physical Address: 3415 Grand Avenue, Billings, MT 59102