

April 27, 2009

John M. Muhlfeld
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Whitefish MT 59937

Dear John,

Thank you for your recent email regarding the BNSF Whitefish facility. I have included your questions for clarity and then followed with the Department of Environmental Quality's (DEQ) response. Please note that due to limited staff resources we do not currently have a project officer assigned to this facility; however, we are actively recruiting to fill this position and hope to have a project officer working with BNSF and the community shortly.

1) If the situation is accurately profiled in the DEQ document as: "Dissolved phase contaminants exceeding DEQ risk-based screening levels or DEQ-7 groundwater standards have not been detected south of Railway Street or east of Miles Avenue."... BNSF is buying property in the untested areas at a premium, do they have some sort of impact model that demonstrates a high likelihood of contamination?

In February 2009, after being contacted by several landowners near the BNSF Whitefish Fueling Facility (facility) regarding the potential land purchases, DEQ required that BNSF provide any environmental or other sampling data collected regarding those properties. In March 2009, BNSF responded that all data regarding the facility, including surrounding properties, has previously been submitted to DEQ. To answer your question, the material previously submitted by BNSF does not include any impact model that demonstrates a high likelihood of contamination on the property south of Railway Street or east of Miles Avenue. Please note, the most recent groundwater sampling showed no contaminants above DEQ-7 groundwater standards from monitoring wells both up-gradient and cross-gradient to the area east of Miles Avenue.

2) What happens to the property they purchase? (is cleanup mandated by DEQ?)

If DEQ determines at any point that contamination exceeding cleanup levels has migrated to the property BNSF has purchased or is attempting to purchase, DEQ will require that it be cleaned up. To the extent your question is what BNSF plans to do with any purchased property, DEQ does not have this information. However, BNSF would have to comply with any city ordinances that apply to properties it acquires. I encourage you to contact Michael Hart at 406-256-4023 for more information on BNSF's plans for the property.

3) What does a clean up for this type of contamination look like – soil remediation, removal etc?

DEQ will determine what cleanup is needed at the BNSF Whitefish Facility in a Record of Decision (ROD), which has not yet been issued. However, at other BNSF fueling facilities around the State, a wide range of cleanup options have been selected based on the contamination and site-specific characteristics. These alternatives have ranged from excavation of source material, injection of chemicals that aid in the breakdown of the contaminants, extracting contaminated vapors in the soil, pumping and treating contaminated groundwater, as well as others.

4) Can we operate tourism & retail based businesses effectively during a clean up?

When implementing cleanup actions, DEQ strives to minimize disturbances to operating businesses. At many sites, business continued to operate without disruption. As stated above, however, because DEQ has not yet issued a ROD, it is difficult to answer more specifically.

5) Are there similar case histories we can look at for better understanding and possibly answer some of the above questions?

BNSF has a number of sites in Montana similar to the one in Whitefish. Information regarding the BNSF Livingston fueling facility can be found on our website at the following link: <http://deq.mt.gov/StateSuperfund/BNLivingston.asp>. Other facility summaries can be found using the mapping tool at the following link: <http://deq.mt.gov/statesuperfund/cecralistpage.asp>.

I hope this helps answer your questions regarding the facility. Please feel free to share these answers with your fellow council members and the public. Don't hesitate to contact DEQ if any additional questions may arise.

Sincerley,

Richard H. Opper

cc: Remediation Division