



September 12, 2019

To Whom It May Concern:

The Department of Environmental Quality (DEQ) is accepting public comments specific to new underground storage tanks to be installed at 2525 N 19<sup>th</sup> Ave., Bozeman, Montana 59715 at the proposed Town Pump Bozeman 6.

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 30,000 dual-compartment Xerxes FRP double-walled UST containing E10 Premium Gasoline (15,000-gallon compartment) and Diesel # 2 (15,000-gallon compartment); and one 21,000-gallon triple-compartment Xerxes FRP double-walled UST containing Non E 10 Premium Gasoline (7,000 gallon compartment), Diesel # 1 (7,000 gallon compartment), and Off-Road Dyed Diesel (7,000 gallon compartment). All the UST systems will utilize secondarily contained NUPI Americas Smartflex double-walled electrofusion semi-rigid pipe. The proposed project will add six (6) new UST systems to the newly developed Town Pump Bozeman 6, located at 2525 N 19<sup>th</sup> Ave., Bozeman, MT 59715.

Specific installation plans include the following materials and monitoring systems: **Tank(s):** This project involves installing the following six (6) tanks: 30,000-gallon regular unleaded, 15,000-gallon E10 Premium Gasoline, 15,000-gallon Diesel # 2, 7,000-gallon Non E10 Premium Gasoline, 7,000-gallon Diesel # 1, and 7,000-gallon Off-Road Dyed Diesel. All six tanks will be Xerxes Fiberglass Reinforced Plastic (FRP) double-walled UST systems. Each tank will be utilized by Town Pump Bozeman 6 as a petroleum re-fueling site and convenience store. **Piping:** All product piping associated with this project will be NUPI Americas Smartflex secondary contained double-walled electrofusion semi-rigid flexible pipe. Approximately 1,660 feet of double-walled NUPI Americas Smartflex piping will be utilized in this project. **Sumps:** ZCL Xerxes fiberglass tank-top sumps will be installed around each tank's submersible turbine pump. NUPI Americas HDPE 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 Veeder Root TLS 450 plus 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 September 26, 2019. Our email address is [dequstprogram@mt.gov](mailto: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: Billings Holdings LLC	FACILITY NO: 60-15339
PERMIT NO: 20-0022	DATE OF APPLICATION: July 19, 2019
PERSON PREPARING EA: Seth Hendrix	COUNTY: Gallatin
LOCATION: 2525 N 19 <sup>th</sup> Avenue, Bozeman, MT 59715	
FACILITY NAME: Town Pump Bozeman 6	EA COMPLETED: 9/12/2019
<p><b>DESCRIPTION OF PROPOSED ACTION:</b> <b>Tank(s):</b> This project involves installing the following six (6) tanks: 30,000-gallon regular unleaded, 15,000-gallon E10 Premium Gasoline, 15,000-gallon Diesel # 2, 7,000-gallon Non E10 Premium Gasoline, 7,000-gallon Diesel # 1, and 7,000-gallon Off-Road Dyed Diesel. All six tanks will be Xerxes Fiberglass Reinforced Plastic (FRP) double-walled UST systems. Each tank will be utilized by Town Pump Bozeman 6 as a petroleum re-fueling site and convenience store. <b>Piping:</b> All product piping associated with this project will be NUPI Americas Smartflex secondary contained double-walled electrofusion semi-rigid flexible pipe. Approximately 1,660 feet of double-walled NUPI Americas Smartflex piping will be utilized in this project. <b>Sumps:</b> ZCL Xerxes fiberglass tank-top sumps will be installed around each tank's submersible turbine pump. NUPI Americas HDPE 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 Veeder Root TLS 450 plus automatic tank gauge (ATG) will continuously monitor all operational parameters.</p> <p>Products to be stored: Regular Unleaded Gasoline, E 10 Premium Gasoline, Diesel # 2, Non-E10 Premium Gasoline, Diesel # 1, and Off-Road Dyed Diesel.</p>	
<p><b>DESCRIPTION OF THE BENEFITS AND PURPOSE OF THE PROPOSED ACTION:</b> Purpose is to install six (6) new petroleum UST systems for storing and dispensing gasoline, premium gasoline, diesel, and off-road dyed diesel at Town Pump Bozeman 6, 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. <b>TOPOGRAPHY:</b> 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 west of N 19 <sup>th</sup> Avenue, south of Kimberwicke road, and north of Rawhide Ridge Road in Bozeman, Montana. The physical address of the site is 2525 N 19 <sup>th</sup> Ave, Bozeman, MT. The site is currently a 2.222-acre bare lot and is generally located between the existing Target retail store and the United States Postal Service in Bozeman. It is reported that previous use for the property was a Christmas Tree Farm. The City of Bozeman lists this property as "Opportunity Subdivision". It is the 1 <sup>st</sup> lot in this subdivision. A City of Bozeman special use permit application has

PHYSICAL ENVIRONMENT	POTENTIAL IMPACTS					
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
						<p>been applied for by the owner. The Special Use Permit application number is 18525. The project includes the building of a 13,001-square foot convenience store plus canopy and fueling station. The permit application includes a parking lot with 21 parking spaces. 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 has also applied for Infrastructure improvements which will include storm water, water distribution (water service line), sewer systems (sewer service line), drainage basin, 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.</p> <p>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 by Montana DEQ Water Protection Bureau.</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 the proposed location. There are approximately 50 public and private water wells located within 1 mile of the proposed site. East Gallatin River is located within 0.7 miles of the proposed site. A ditch runs through the west section of the property and is</p>

					<p>located within 370 feet of the proposed site.</p> <p>There is no significant surface water within 0.9 miles of the proposed underground storage tank installation. The proposed site lies within the Gallatin watershed.</p> <p>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 by Montana DEQ Water Protection Bureau.</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.	<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 mitigated by 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 airshed is located at least 41 miles away from the project site (Yellowstone National Park)</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?		X		<p>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.</p>

<p>6. <u>IMPACTS ON OTHER ENVIRONMENTAL RESOURCES:</u> Are there other studies, plans or projects on this tract?</p>		X			<p>A City of Bozeman special use permit application has been applied for by the owner. The Special Use Permit application number is 18525. The project includes building of a 13,001square foot convenience store plus canopy and fueling station. The permit application includes a parking lot with 21 parking spaces. 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 has also applied for Infrastructure improvements which will include storm water, water distribution (water service line), sewer systems (sewer service line), drainage basin, lighting plan, landscape site plan, irrigation plan, refuse enclosure plan, convenience store building, and canopy.</p>
<p>7. <u>TERRESTRIAL, AVIAN, AND AQUATIC LIFE AND HABITATS:</u> Is there substantial use of the area by important wildlife, birds or fish?</p>			X		<p>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. The Sage Grouse Habitat Conservation Program lists this property in the exempt community's area. There are no listed Critical Habitat areas located within 9.0 miles of the proposed site. Critical Canada Lynx habitat found in the Gallatin National Forest is 9.0 miles away from the proposed site.</p>
<p>8. <u>VEGETATION COVER, QUANTITY AND QUALITY:</u> Will vegetative communities be permanently altered? Are any rare plants or cover types present?</p>			X		<p>Montana Cadastral lists this property, which is owned by Bozeman 6 LLC, as Property Type VAC_U- Vacant Land-Urban. The Subcategory is listed as commercial property. The location currently is surrounded by many large and small-scale businesses and private residential properties are in the vicinity. 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. The Sage Grouse Habitat Conservation Program lists this property in the exempt community's area. There are five endangered species listed for Gallatin</p>

						County: Ute Ladies' Tresses, Canada Lynx, Grizzly Bear, Wolverine, and Whitebark Pine. There are 54 animal species of concern and 39 plant species of concern identified in Gallatin County. There are Riverine Wetland Habitats located within 0.58 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 104 National Historic Landmarks in Gallatin 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				Town Pump Bozeman 6 will be visible from North 19 <sup>th</sup> Avenue, and will be located between Target and the United States Postal Service in Bozeman. The proposed projects, (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 improved rural land properties. Neighboring existing businesses include Target, Bob Ward's Sports & Outdoors, Ross Dress for Less, Bed Bath & Beyond, Bozeman Ford Lincoln, Gibson Acoustic, Blitz Motor Sports, Keller Supply, Valley Glass & Windows, UPS Customer Center, Hilton Garden Inn Bozeman, SpringHill Suites by Marriot Bozeman, and the United States Postal Service.
12. <u>AGRICULTURE:</u> Will grazing lands, irrigation waters or crop production be affected?			X			The property's 2.222-acre vacant lot status will change to commercial property. 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 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 &amp; 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 &amp; 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 (10) 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 N 19 <sup>th</sup> Avenue, Kimberwicke Street, and Rawhide Ridge Road, in Bozeman. 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 5.5 miles (Bridger Range Gallatin National Forest) of the project site, but is not accessed through the project location. Bridger Creek Golf Course is located 1.63 miles east of the proposed site. Rose Park is located 0.75 miles south of the proposed site. Gallatin County Regional Park/Dinosaur Park is located 1.0 miles southwest of the proposed site. Bridger Bowl Ski Area is located 11.34 miles northeast of the proposed site. Recreation areas on the Gallatin River are located within 6.76 miles from the project area. 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>Town Pump Bozeman 6 will be visible from North 19<sup>th</sup> Avenue and will be located between the newly developed Kimberwicke Street and Rawhide Ridge Road in Bozeman. 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 City of Bozeman lists this property as "Opportunity Subdivision". It is the 1<sup>st</sup> lot in this subdivision. A City of Bozeman special use permit application has been applied for by the owner. The Special Use Permit application number is 18525. The project includes the building of a 13,001square foot convenience store plus canopy and fueling station. The permit application includes a parking lot with 21 parking spaces. 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 has also applied for Infrastructure improvements which will include storm water, water distribution (water service line), sewer systems (sewer service line), drainage basin, lighting plan, landscape site plan, irrigation plan, refuse enclosure plan, convenience store building, and canopy. The proposed project and associated development is expected to be in conformance with current City of Bozeman, State of Montana, and Gallatin County 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 [degustprogram@mt.gov](mailto: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.

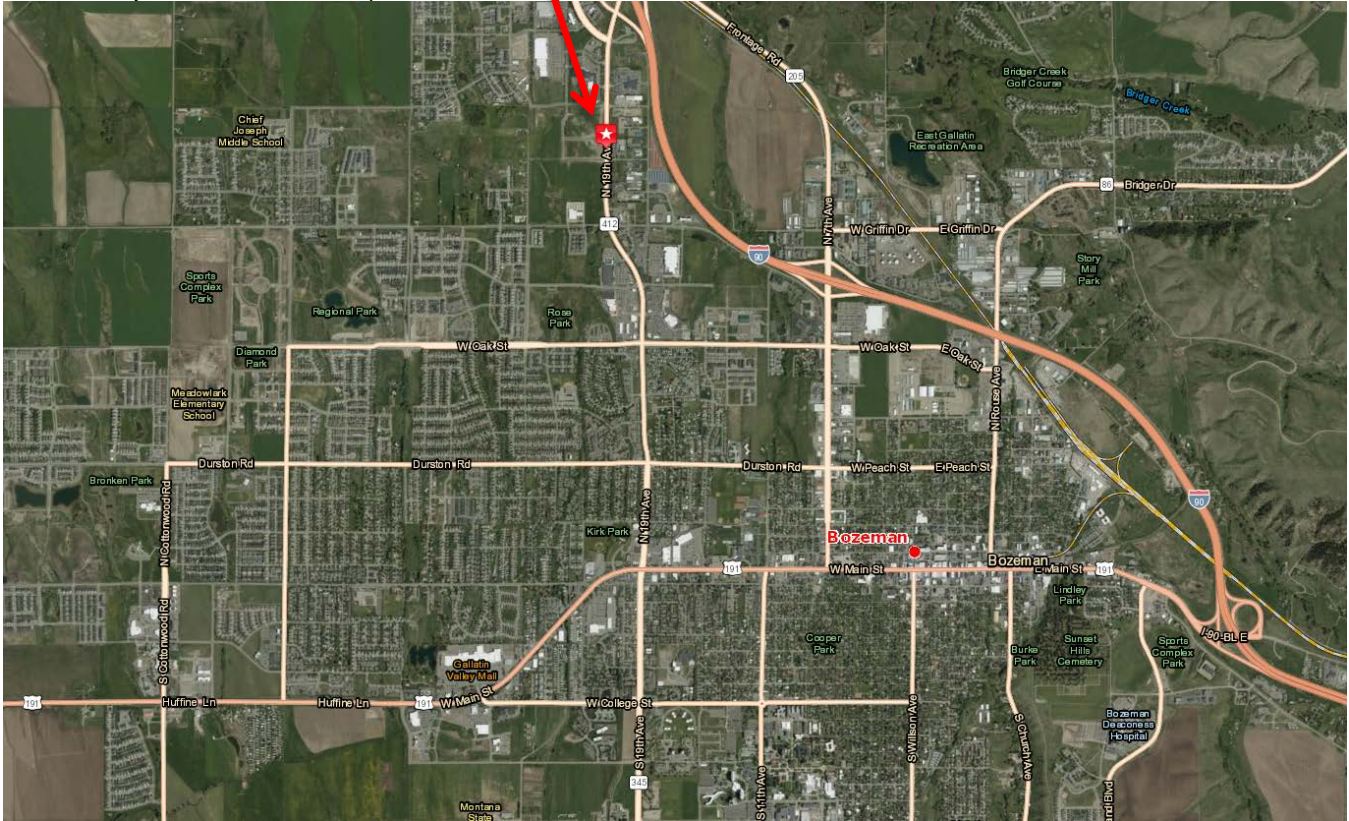
PERMIT CONDITION EFFECTS: Permit conditions are based on Montana and federal regulations, PEI RP100-2000 and accepted standard engineering practices.

cc: Governor's Office  
Legislative Environmental Policy Office

General Location of Project Site:

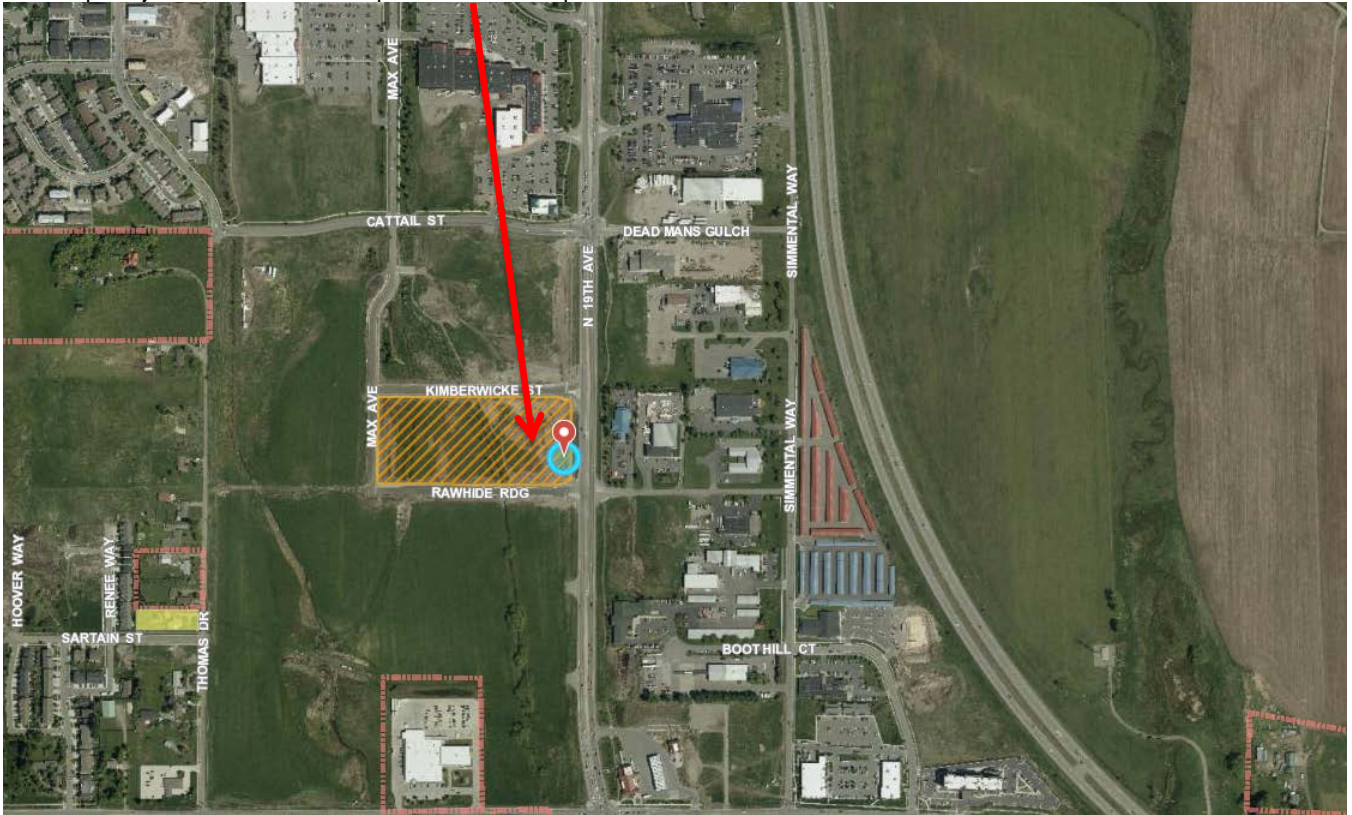


Detailed Project Site Location: Proposed Town Pump Bozeman 6 Site



Proposed Project Site Physical Address: 2525 N 19<sup>th</sup> Avenue, Bozeman, MT 59715

Close-up Project Site Location: Proposed Town Pump Bozeman 6 Site



Proposed Project Site Physical Address: 2525 N 19<sup>th</sup> Avenue, Bozeman, MT 59715