



May 5, 2016

To Whom It May Concern:

The Department of Environmental Quality (DEQ) is accepting public comments on new underground storage tanks to be installed in Great Falls, 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 25,000-gallon single-compartment Xerxes Fiberglass Reinforced Plastic (FRP) double-walled Underground Storage Tank (UST), one 21,000-gallon dual-compartment Xerxes FRP double-walled UST, and one 27,000 gallon FRP triple-compartment UST. The single-compartment UST system will have the capacity to store 25,000-gallons of E10 Unleaded Gasoline. The 21,000-gallon dual-compartment tank will have the capacity to store 15,000 gallons of E10 Premium Unleaded Gasoline and 6,000 gallons of Non-E10 Premium Unleaded Gasoline. The 27,000-gallon triple-compartment tank will have the capacity to store 6,000 gallons of #1 Diesel, 15,000 gallons of #2 Diesel, and 6,000 gallons of Dyed Diesel. All of the regulated UST systems will utilize secondarily contained Nupigeco flexible plastic piping. This project will add six new UST systems for the newly-developed Town Pump Great Falls #7 site. This new UST facility will be located at 1411 10th Avenue South in Great Falls, Montana.

Specific installation plans include the following materials and monitoring systems: Tanks: This project involves installing one 25,000-gallon Xerxes FRP double-walled UST, one 21,000 gallon Xerxes FRP double-walled UST, and one 27,000 gallon Xerxes FRP double-walled UST. All tanks will be utilized by New Inns Inc. as a petroleum re-fueling site. Piping: All product piping associated with this project will be double-walled Nupigeco pipe. Approximately 1,921 feet of double-walled Nupigeco product piping will be utilized in this project. Sumps: Nupi Americas HDPE under-dispenser containment sumps and Xerxes tank-top sumps will be installed. Tank and piping system 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 all of the piping. 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 the human health or natural environment. After the ten-day comment period, DEQ will decide what action to take regarding this permit.

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 May 24, 2016. Our email address is dequstprogram@mt.gov and our mailing address is P.O. Box 200901, Helena, MT, 59620-0901.

Sincerely,

Wally Jemmings, Environmental Science Specialist
Underground Storage Tank Section
Waste and Underground Tank Management Bureau

Enc: Environmental Assessment

O/O NAME: New Inns Inc.	FACILITY NO: 60-15283
PERMIT NO: 16-0198	DATE OF APPLICATION: April 13, 2016
PERSON PREPARING EA: Wally Jemmings	COUNTY: Cascade
LOCATION: 1411 10 th Avenue South, Great Falls, MT 59405	
FACILITY NAME: Town Pump Inc. Great Falls #7	EA COMPLETED: 5/5/2016
<p>DESCRIPTION OF PROPOSED ACTION: <u>Tanks</u>: This project involves installing one 25,000-gallon Xerxes FRP double-walled UST, one 21,000 gallon Xerxes FRP double-walled UST, and one 27,000 gallon Xerxes FRP double-walled UST. All tanks will be utilized by New Inns Inc. as a petroleum re-fueling site. <u>Piping</u>: All product piping associated with this project will be double-walled Nupigeco. Approximately 1,921 feet of double-walled Nupigeco piping will be utilized in this project. <u>Sumps</u>: Nupi Americas HDPE under-dispenser containment sumps and Xerxes tank-top sumps will be installed. Tank and piping system 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 all of the piping. A Veeder Root TLS-450 Plus Automatic Tank Gauge (ATG) will continuously monitor all operational parameters.</p> <p>Products to be stored: E10 Unleaded Gasoline, E10 Premium Unleaded Gasoline, Non-E10 Premium Unleaded Gasoline, #1 Diesel, #2 Diesel, and Dyed Diesel.</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 gasoline and diesel at Town Pump Great Falls #7, 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			This site is a former TownHouse Inn. The location is currently a flat lot located approximately 700 feet east of Holiday Village Mall in Great Falls, Montana. The physical address is 1411 10 th Avenue South, Great Falls, MT 59405. There are no known or reported unusual geologic features. Tanks and product piping will be buried underground, while appurtenant equipment is above ground. 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 not present at this proposed location.</p> <p>There are 70 public and private water wells within 1 mile of the proposed site.</p> <p>There is no surface water within 100 feet of the proposed underground storage tank installation.</p> <p>The Sun River and the Missouri River are approximately 1.5 miles to the north west. The proposed site lies within the Upper Missouri-Dearborn Watershed, the Missouri River sub-watershed, and the Missouri-Choteau TPA TMDL Planning Area.</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. The proposed UST systems will include Stage 1 Vapor Recovery, which captures vapors released during filling of the UST systems and directs them back to the tanker truck. Natural air currents and submerged fill pipes will control hydrocarbon vapors. The proposed project site is located near the following Class I airsheds: Glacier National Park and the Bob Marshall Wilderness Area (approximately 115 miles) and the Gates of the Mountains National Wilderness Area (approximately 57 miles).</p>

5.	<u>DEMANDS ON ENVIRONMENTAL RE-SOURCES 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 is 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 critical habitats within 60 miles of this project 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 location as Property Type CU - Commercial Urban. 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 is one endangered species listed for Cascade County: Pallid Sturgeon. There are three threatened species listed for Cascade County: Red Knot, Grizzly Bear, and Canada Lynx. There are 57 animal species of concern and 13 plant species of concern identified in Cascade County.
10.	<u>HISTORICAL AND ARCHEOLOGICAL SITE:</u> Are any historical, archeological or paleontological resources present?			X			The National Register of Historic Places lists 25 National Historic Landmarks within Cascade County; all of the landmarks are in the Great Falls vicinity. 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 status as Commercial Urban will remain the same. 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 (retail store/re-fueling station) 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 stage 1 vapor recovery, natural air currents, and tank vents will dissipate the 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) 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 anticipated that this project (re-fueling station) will create an estimated 35 retail jobs and generate some income to the local area.
7.	<u>LOCAL AND STATE TAX BASE REVENUES:</u> Will the project create or eliminate tax revenue?	X				It is not anticipated that the (re-fueling station) 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 not anticipated that this proposed project will add to the local traffic flow on this section of 10 th Avenue South. 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			This proposed project location is within 10 miles of Benton Lake National Wildlife Refuge to the north, within 25 miles of Lewis and Clark National Forest to the east, within 30 miles of Lewis and Clark National Forest to the south east, within 50 miles of Helena National Forest to the south, and within 70 miles of Flathead National Forest to the west. No designated USFS recreational properties are located within five miles of the project area location. 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 runs 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) 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 Great Falls and Cascade 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 interested parties to this application and provide the opportunity for public comment. A copy of this Environmental Assessment of the proposed underground storage tank installation has also been posted at our website (<http://deg.mt.gov/Land/ust/ea>). Substantive comment may also be provided to 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.

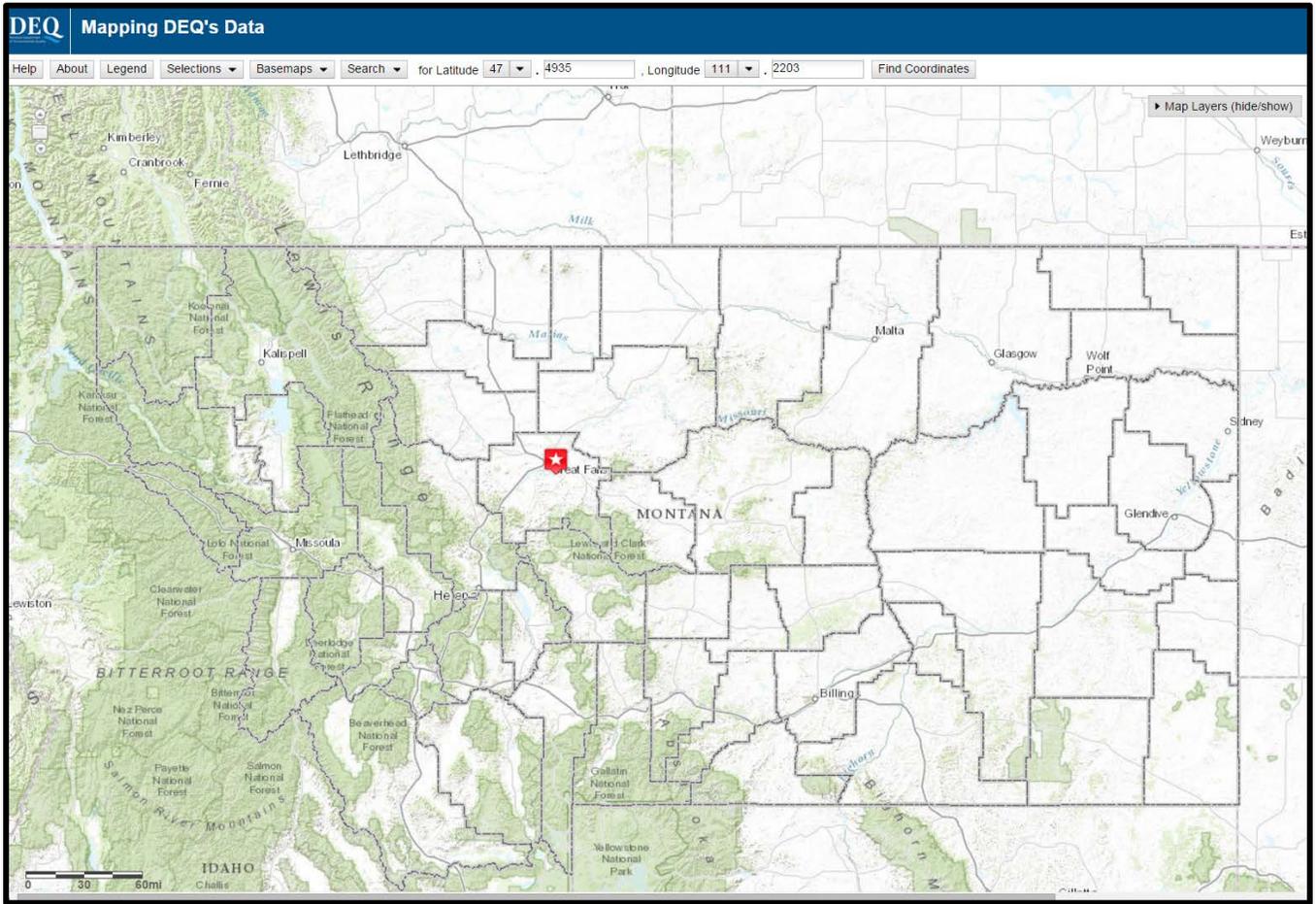
OTHER GROUPS OR AGENCIES CONTACTED OR WHICH MAY HAVE OVERLAPPING JURISDICTION: The Montana Department of Natural Resources and Conservation, The Montana Department of Justice, and the State Fire Marshall's Office.

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

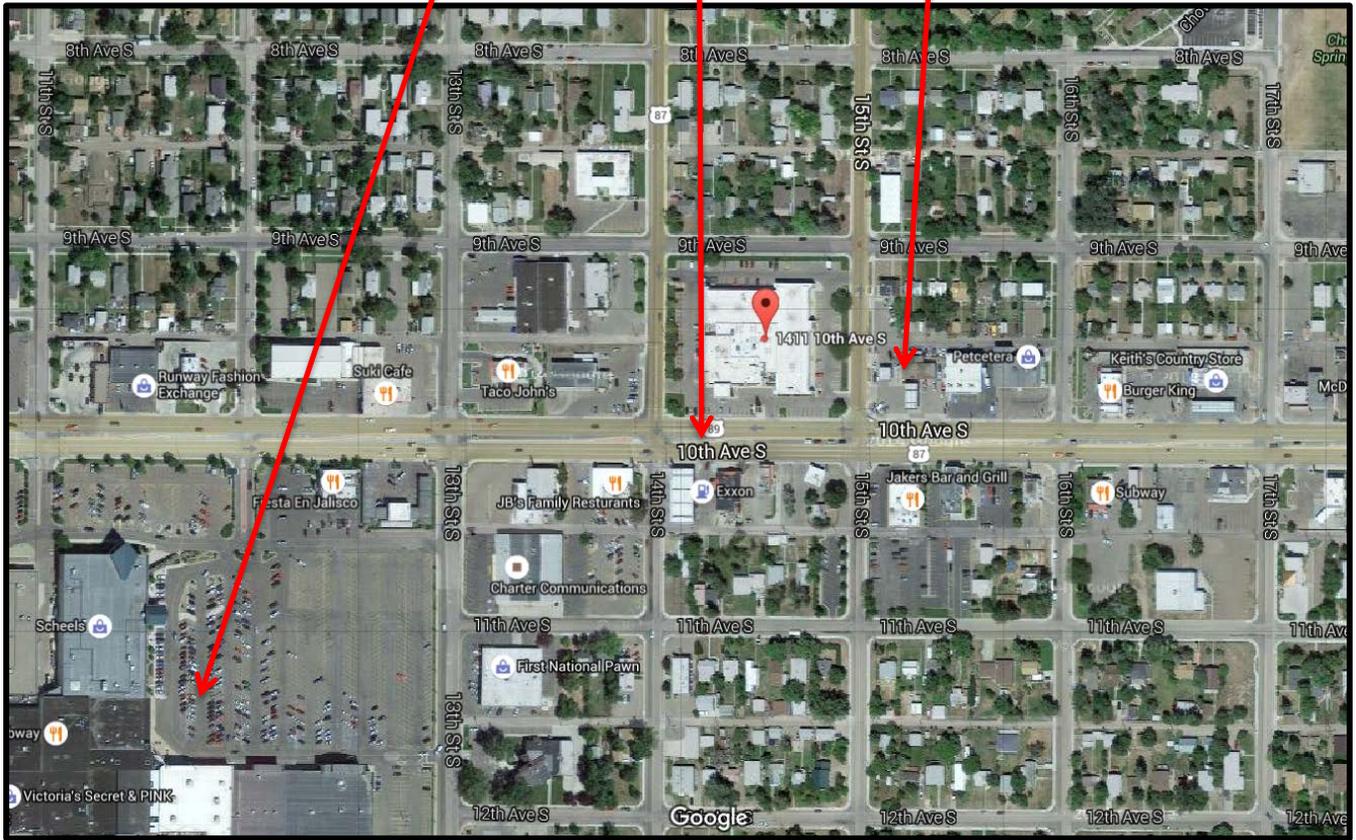
PERMIT CONDITION EFFECTS: Permit conditions are based on Montana and federal regulations, PEI RP100-2000 and accepted standard engineering practices.

cc: Governor's Office
Legislative Environmental Policy Office

General Location of Project Site:



Detailed Project Site Location: Holiday Village Mall, Town Pump Great Falls #2, 15th Street Service



Proposed Tank Basin Coordinates: Latitude (47.49445); Longitude (- 111.28312)
Proposed Project Site Physical Address: 1411 10th Avenue South, Great Falls, MT 59405