

AGENDA

PETROLEUM TANK RELEASE COMPENSATION BOARD MEETING

June 22, 2026

10:00 a.m.

Teleconference Information Available Upon Request

Contact: gpirre@mt.gov or taylor.pirre@mt.gov

Colonial Building, 2401 Colonial Drive, Helena, MT – Wilderness Room (Second Floor)

NOTE: Individual agenda items are not assigned specific times. For public notice purposes, the Board will begin the meeting at the time specified. However, the Board might not address the specific agenda items in the order they are scheduled. The Board may take action on any of the items on the agenda. The Board encourages public participation in Board Discussions. Persons who wish to participate should identify themselves to the Board Presiding Officer or Executive Director prior to the Board’s consideration of the matter in which the persons are concerned. Anyone wishing to participate in Board discussions will be recognized by the Presiding Officer in keeping with normal Board parliamentary procedure. For disability accommodation, please contact DEQ Personnel at 444-4218.

10:00 Board Meeting

I. ADMINISTRATIVE AGENDA ITEMS

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II. ACTION ITEMS

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III. DISCUSSION ITEMS

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V. Public Forum

Under this item, members of the public may comment on any public matter within the jurisdiction of the Board that is not otherwise on the agenda of the meeting. Individual contested case proceedings are not public matters on which the public may comment.

VI. Next Proposed Board Meeting date: September 14, 2026

VII. Adjournment

PETROLEUM TANK RELEASE COMPENSATION BOARD
MINUTES
April 20, 2026
IN-PERSON AND TELECONFERENCE HYBRID MEETING

Board Members in attendance were John Monahan, Kristi Kline, Grant Jackson, Calvin Wilson, and Curt Kelley, with Cody O'Connor in attendance via Zoom, and Jess Stenzel being absent. Also in attendance were Terry Wadsworth, Executive Director; Garnet Pirre and Ann Root, Board Staff; and Stuart Segrest, Board Attorney.

Presiding Officer John Monahan called the meeting to order at 10:01 a.m.

Approval of February 9, 2026, Minutes

Mr. Jackson moved to approve the February 9, 2026 minutes as written. Mr. Kelley seconded. Motion passed unanimously by voice vote with Ms. Kline recusing herself.

Weekly Reimbursements

Mr. Wadsworth presented a summary of weekly claim reimbursements for the weeks of January 28, 2026 to March 18, 2026.

WEEKLY CLAIM REIMBURSEMENTS		
April 20, 2026, BOARD MEETING		
Week of	Number of Claims	Funds Reimbursed
1-28-26	23	\$144,800.90
2-11-26	27	\$286,940.27
2-18-26	27	\$385,574.99
2-25-26	17	\$104,239.94
3-4-26	14	\$101,385.80
3-11-26	14	\$165,516.38
3-18-26	11	\$60,063.66
Total	133	\$1,248,521.94

Mr. Wadsworth presented the Board with a summary of the denied claims. There were 20 denied claims:

Denied Claims	
April 20, 2026 Board Meeting	
Claim ID	Reason Denied
20251128F	Claim withdrawn at the request of the consultant due to wrong Form 3 contained within the claim.
20260226H	All costs in claim adjusted as claim consists invoice 52507003 which was previously used in claim 20260126B. That earlier claim 20260226H is currently suspended pending consultant's clarification of costs.
20180301L	No documentation of department approved corrective action plan.
20240715C	Reimbursement denied ascribable to Grant Funds § 75-11-307(2)(h), MCA
20240717B	Reimbursement denied ascribable to Grant Funds § 75-11-307(2)(h), MCA
20240823A	Reimbursement denied ascribable to Grant Funds § 75-11-307(2)(h), MCA
20241114A	Reimbursement denied ascribable to Grant Funds § 75-11-307(2)(h), MCA
20250207A	Reimbursement denied ascribable to Grant Funds § 75-11-307(2)(h), MCA
20240812C	Reimbursement denied ascribable to Grant Funds § 75-11-307(2)(h), MCA
20240717C	Reimbursement denied ascribable to Grant Funds § 75-11-307(2)(h), MCA
20240823C	Reimbursement denied ascribable to Grant Funds § 75-11-307(2)(h), MCA
20241114C	Reimbursement denied ascribable to Grant Funds § 75-11-307(2)(h), MCA
20240715D	Reimbursement denied ascribable to Grant Funds § 75-11-307(2)(h), MCA

<i>Denied Claims</i> April 20, 2026 Board Meeting	
Claim ID	Reason Denied
20240716A	Reimbursement denied ascribable to Grant Funds § 75-11-307(2)(h), MCA
20240717A	Reimbursement denied ascribable to Grant Funds § 75-11-307(2)(h), MCA
20240812B	Reimbursement denied ascribable to Grant Funds § 75-11-307(2)(h), MCA
20240823B	Reimbursement denied ascribable to Grant Funds § 75-11-307(2)(h), MCA
20241114B	Reimbursement denied ascribable to Grant Funds § 75-11-307(2)(h), MCA
20260120Z	Consultant requests claim to be withdrawn: costs will be resubmitted at a later date.
20260120B	Claimed costs all related to a scope of work (while present in approved work plan) was completed prior to work plan approval. Consequently, those costs are prohibited from reimbursement from the Fund by § 75-11-309 MCA. See Exec Director's 2025-09-18 email.

Mr. Wadsworth stated that many of the denied claims had been submitted by the Northern Cheyenne Tribe. Two (2) of the denied claims were ones that had been withdrawn by the consultant, one (1) claim had been withdrawn due to duplicate costs with another claim, one (1) had been withdrawn due to no documentation of Department of Environmental Quality (Department) approval on the workplan (WP), and one (1) had been denied due to the scope of work being completed prior to WP approval.

Mr. Monahan asked if all the claims related to the Northern Cheyenne Tribe dispute had been resolved. Mr. Wadsworth stated that, to his knowledge, this was so.

Mr. Monahan recused himself from any matters regarding Jackson Energy, and any of their dealer locations or customers. Mr. O'Connor recused himself from any matters related to Tank Management Services. Mr. Kelley recused himself from any matters pertaining to Little Horn State Bank and Little Horn State Bank's customers. Mr. Wilson recused himself from any matter regarding EnergiSystems and customers. Mr. Jackson and Ms. Kline expressed no known conflict of interest.

Ms. Kline moved to ratify the weekly reimbursements and 20 denied claims as presented. Mr. Jackson seconded. The motion passed unanimously by voice vote.

Board Claims

Mr. Wadsworth presented the Board with the two (2) claims for an amount greater than \$25,000. He stated that the Board staff recommended ratifying the reimbursement of the claims over \$25,000.

Facility Name Location	Facility-Release ID#	Claim#	Claimed Amount	Adjustments	Penalty	Co-pay	**Estimated Reimbursement
Town Pump Inc Kalispell I	1508709 2567	20260120J	\$28,213.38	-0-	-0-	-0-	\$28,213.38
Farmers Union Oil Co Chinook	310274 2559	20260226C	\$63,340.64	\$4,332.06	-0-	-0-	\$59,008.58
Total			\$91,554.02	\$4,332.06	-0-	-0-	\$57,221.96

*** In accordance with the Board delegation of authority to the Executive Director signed on December 8, 2003, the Board staff will review the claims for the Board. If the dollar amount of the claim is \$25,000.00 or greater, the claim must be approved and ratified by the Board at a regularly scheduled meeting before reimbursement can be made.**

****In the event that other non-Board claims are paid in the period between preparation for this Board meeting and payment of the claim listed above, the amount of co-payment remaining may differ from that projected at this time, which may change the estimated reimbursement.**

Mr. Monahan recused himself from any matters regarding Jackson Energy, and any of their dealer locations or customers. Mr. O'Connor recused himself from any matters related to Tank Management Services. Mr. Kelley recused himself from any matters pertaining to Little Horn State Bank and Little Horn State Bank's customers. Mr. Wilson recused himself from any matter regarding EnergiSystems and customers. Mr. Jackson and Ms. Kline expressed no known conflict of interest.

Ms. Kline moved to ratify the two (2) Board claims as presented. Mr. Jackson seconded. The motion passed unanimously by voice vote.

Attorney Report

Mr. Segrest presented the Board with the Board Attorney Report. He stated that there were no major updates to present at this time. At present, the Cascade County case has been remanded by the Supreme Court back to District Court. The Board and District Court were waiting on Cascade County and the plaintiff's attorney to take action to ask the District Court to remand to the Board for further action, as had been directed by the Supreme Court. He stated that Cascade County hadn't taken action at this time. He noted, however, that their attorney had reached out to him a while ago and suggested a meeting, but that they had not reached out to him after this. The case was still on a hold. He stated there were no further legal updates at this time.

Mr. Monahan noted that the Cascade County case had been going on for some time and asked if there was a statute of limitations or timeframe for their response, and if the case would be dismissed if Cascade County did not respond in that timeframe. Mr. Segrest said if, hypothetically, the case had been waiting for over a year or so after it had been remanded, the Board and Board attorney could make a motion to dismiss the case for failure to prosecute. This motion would be made on the grounds that the plaintiff had not moved the case forward and enough time had elapsed since their last response. At present, not enough time had passed for the Board to make this motion. He added that he did not recommend prompting the plaintiff for further action at this time, as it did not negatively affect the Board to let the case wait for the time being. He stated that, at some future point, the Board could motion to dismiss the case for failure to prosecute.

Fiscal Report MarFY26

Mr. Wadsworth presented the Board with a summary of the Fiscal Report. He noted that the Fund was still holding a high balance that was close to eight (8) million dollars. He expressed concern about what the balance would be when January 2027 arrived, as it would be a Legislative Session year.

Mr. Monahan asked if the Board was not allocating enough work in proportion to the funding that was coming in. Mr. Wadsworth stated that there was not enough work being proposed and performed on the ground to consume the balance that was in the Fund's account.

Mr. Kelley asked if the Board staff was receiving many applications for the preventative claims. Mr. Wadsworth stated that the Board staff had so far obtained two (2) preventative claim forms. One (1) of them was not consistent with the time window requirements, while the Board staff was working on reimbursing the other one (1) at present. Ms. Pirre stated that the Board staff anticipated that many more would be coming through. She had been informed by Town Pump that they would be starting to assemble preventative claims, as a majority of inspections at their properties had been conducted over the previous month. Because of ongoing discussions with Town Pump, it appeared there were going to be more claims in the near future.

Mr. Kelley asked if there would be many administrative hours involved with this process for the Board staff. Mr. Wadsworth said there would be a little bit of administrative time involved because Board staff would likely need around 25 to 30 preventative claims first to get a feel for how the process would go. At present the Board staff was still in the process of answering questions regarding the claims. Much of the process was still in limbo because those submitting the claims were still confused on some of the rules. The delays in activity would dwindle as both those submitting the claims and Board staff became more familiar with the process.

Mr. Monahan asked Ms. Pirre about her presentation for preventative claims at a recent operator training event. She answered that she attended the Underground Storage Tank (UST) Conference, and had made a presentation there. She stated that it had been a great event, as she received many questions and pieces of helpful feedback during her presentation. People had still been reaching out with questions since the training event. She was going to present the information at the upcoming Petroleum Marketers Conference, and the feedback had helped identify the points of confusion that needed to be clarified.

Mr. Monahan asked if the Board staff was confident that the contractors knew that once they got all of their work on-site done, they could submit for reimbursement, or tell the owner to submit. Ms. Pirre stated that, in the case of the preventative claims, the owner was the one that needed to submit the claims. A notice had been sent out to the owners and consultants once the rules and the law for the preventative claims had been published. The instructions and forms were also available on the PTRCB website, but she expected additional questions. Mr. Wadsworth added that this was why the Board staff believed the presentation and discussion at the Petroleum Marketer's Conference would be so productive.

Suggestions were made for other methods of outreach to the owners and contractors:

- Mr. Jackson suggested publishing the information on Facebook.
- Ms. Kline stated that it would be worth investigating where petroleum station owners obtained their news, Ms. Pirre stated that she had heard a couple of the contractors who perform the inspections had provided the forms and instructions to the owners at sites they were inspecting this year.
- Mr. Wadsworth stated that another source that would be worth asking was the installers and removers.

Ms. Pirre also stated that the most practical and likely use of the preventative claims would be for inspection costs incurred after January 1, 2026. The next claim could then be submitted 1,000 days later for any other incurred preventative costs. She stated that, because of the 1,000-day requirement, it appears difficult for the owner to fit the certain eligible costs within the 1,000-day time frame from the last inspection to the current inspection. She noted there was some confusion about this, which she could understand. However, she noted that there was outreach being done directly and that she believed this was proving to be effective.

Mr. Wadsworth stated that he believed they obtained most of their information at the UST training. He stated this was why Ms. Pirre had done a presentation during the training event. The staff will try to find other venues where the information could also be shared.

Ms. Kline noted that she liked that some of the inspectors were the ones that were sharing the information on the preventative claims, as the owners would know who these people were and trusted them. It is often difficult for someone to ask questions on something that was not well understood, as it ran the risk of making the person look like he or she did not know anything, even though it was important question to ask. She stated that, because of this, there could sometimes be barriers in the way of information outreach on these things. Ms. Pirre added that these questions also contributed towards improvement of the preventative claims being received.

Mr. Wadsworth asked Mr. Monahan if there had been any discussion about the preventative claims at the petroleum conference in Las Vegas. Mr. Monahan answered that he had not attended the event. He stated it might be worthwhile to obtain input from the Board, as well as from Mr. Wadsworth as to how to address the previously stated issues with the Fund's balance.

Mr. Monahan stated that, regarding the fund balance, he had been speaking with the former Presiding Officer, Mr. Jerry Breen, and he had asked how the Fund could have such a high balance when the expenses of cleanup that are being reimbursed had doubled since his tenure with the Board. Because of this, Mr. Monahan asked what the resolution to an issue like this might be. He noted that even though the obligated funds were close to what was recorded on the books, it did not mean that the work would necessarily be completed or reimbursed. He stated that the money would only get spent if the consultant actually performed the labor.

Mr. Monahan asked if there was an outreach method that could be used in order to encourage more workplans and more fieldwork. Mr. Wadsworth stated that the Board may want to make a formal request for more work plans and for more cleanup activity to the Department. Perhaps to send out 400 WP request letters to the facilities that are open and eligible for the Fund that currently don't have a WP and that are not in monitored natural attenuation (MNA). He added that he believed that there were additionally around 600 releases that were Board eligible that were open, and that around 150 of those were in MNA. He stated that he assumed these releases had WPs, and that this left around 400 open releases that the owner could be doing work on. He stated that the only way to encourage further work on these sites would be to have the Department request the owner conduct the cleanup.

Mr. Monahan asked if, when the Department made their request to the owner, that the owner was then required to contact a consultant and get a WP put together. Mr. Wadsworth stated that, generally, a WP request letter sent by the Department would state something about the fact that there was work that needed to be done and that the owner would need to contact the consultant to have a WP created within a particular time so that work could start. Without the WP request letter, most of the sites would stay dormant.

Mr. Wadsworth stated that this was a detriment to the citizens, as there had been property transactions where the new owners would not realize there was a release on the property. Because Montana was a buyer beware state, the new owner had to do the due diligence to know what was being purchased and what was on the property, or beneath the property. A real estate agent wouldn't necessarily inform a potential owner of the existence of a release. He noted that he had a conversation with a new owner recently about not being made aware of the subsurface contamination, as the owner had not known there was a release at the site and wanted to know what could be done with it. It was found that the facility was eligible for the Fund, and that there had been only a little amount of money spent so far to remediate the contamination. He noted that, based on a cursory review

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of available reports, the piece of property was not going to spend the rest of the funding available to remediate it. The contaminant concentrations recorded at the site had been low, and the site was close to closure. He noted that the UST with the release at this particular site had been for heating oil rather than motor fuel, and because of this, the maximum amount reimbursable for the release was less. However, because the amount released was so small, Mr. Wadsworth stated that he believed this maximum wouldn't be exceeded.

Mr. Wadsworth stated that WP request letters kept the process moving along, allowed for the knowledge of the release to be at the forefront of the owner's mind, kept work continuing at the site, and helped remediate the sites in a timely manner.

Ms. Kline asked Mr. Wadsworth if what he was saying was that there was no rule or law that an owner had to notify the buyer that there was an open release on the property they were selling. Mr. Wadsworth answered that this was correct. He stated that he had tried to communicate this to real estate agents in the state of Montana. However, because the real estate agents were not held accountable for notifying a buyer about whether there was a release on the property and Montana was a buyer beware state, they would often not disclose this so as to not diminish the from potential for the sale. He stated that there was no penalty for this, but that there had been lawsuits made against owners on the failure to notify issue in the past, and that it would be nice for potential buyers to have notices regarding releases on the land's property deed.

Ms. Terri Dorrington, Bureau Chief, WMR/TBFF, introduced herself to the Board and stated that, a couple Legislative Sessions ago, there had been a statute change in §70.20.502, MCA that required owners to include a seller disclosure statement. She stated that this statement required the seller to include several items related to the property, including any known petroleum releases. The statute states that owners that failed to disclose this could be legally liable.

Mr. Monahan asked if the real estate agent was the one liable in this scenario, or if it was the owner. Ms. Dorrington answered it was the owner who could be held liable, and that the Department had presented information on this topic to some realtors in town. She stated that the Department was happy to share the presentation with anyone interested, or if anyone knew of any realtors that would be interested. She stated that the Department had trained said realtors on their ArcGIS (GIS) mapping software system to locate sites with contaminants, which would allow them to do their due diligence. She stated that the Department encouraged others to look at the GIS system, especially in cases where the property was changing use. For example, at old gas stations, the Department highly encouraged Phase I and Phase II investigations to see if there was contamination still present at the site.

Mr. Monahan asked when this law had gone into effect. Ms. Dorrington stated it had been two (2) legislative sessions ago. Mr. Monahan asked if she meant in 2023. Ms. Dorrington confirmed this was so. Mr. Monahan asked if this meant it likely went into effect in 2024. Ms. Dorrington confirmed she believed it was so. Ms. Dorrington stated that she believed this law would help in going forward, but that the Department was still seeing cases where someone had bought the property, or someone had passed away, and the release then went undisclosed to the new owner. She stated that, because of this, the Department was trying to move owners away from not disclosing releases and encourage owners to do their due diligence to disclose this information to buyers.

Ms. Kline stated that an observation she'd had since joining the Board was that because older owners didn't disclose releases, it also often meant Board and Department records did not have the correct information for the current owners. She noted that she believed outreach had improved on this, but that this was still something that needed to be kept current and up to date.

Board Staff Report

Mr. Wadsworth provided the Board with a summary of the Board Staff Report. He stated that the report recorded that the current balance in the Fund was \$766,454.38. However, he stated that this was a typo, and that the actual current balance was \$7,666,454.38. Also of note were the pending eligibilities in the report. He stated that, with the RY Timber, Gilligan's Island, and Good 2 Go sites, there were eligibility questions holding up the site from getting approved. The Equity Coop site's eligibility was still pending due to questions on the existence of insurance. Pertaining to the Good 2 Go facility, the Board staff was in communication with the owner, had recommended ineligibility, and was awaiting the owner's response.

Ms. Kline stated that being able to see the report and graphs helped add context to the ongoing situation with the Fund balance. She noted that, outside of the pending eligibilities, there were many approved eligibilities detailed in the graph, which could indicate more projects and work in the future that could help address the Fund balance issue. Mr. Wadsworth stated that the most recent releases generally had a WP, but it was the older releases that were the concern regarding no current work.

Mr. Monahan asked Mr. Wadsworth if this meant that the Board had not had any eligibility applications. Mr. Wadsworth answered that there had been none in the period January 2026 through March 2026. Ms. Pirre stated that the Board staff received one (1) in April after the creation of the Board staff eligibility graph. Mr. Monahan stated that he noticed there had not been any eligibility applications in the early months of the previous year either and asked if this was a regular occurrence for that time of year, or if it had to do with a lack of work. Mr. Wadsworth answered that he believed part of it had to do with the time of year, as most facilities didn't want to remove tanks during the fall or winter season. Because of this, the discovery of releases generally coincided with redevelopment at the site, as the changing out or upgrading of USTs as well as property sales or purchases often led to release discovery.

Mr. Wadsworth added that the eligibility graph did not depict eligibilities that were received but immediately had to be sent back due to an issue. Such eligibilities were not entered into the database from which the graphs were generated. Others were entered but had to be sent back later, which could result in the eligibilities showing up as "withdrawn" on the graph. He stated that examples of this could be seen in April 2024, September 2024, and August 2025. He stated that some eligibilities were marked as withdrawn due to the Department rescinding a release, or because the site had been recommended ineligible and the release was in the process of being closed.

DEQ Petroleum Tank Cleanup Section Report (PTCS)

Summary of Confirmed and Resolved Petroleum Releases

Ms. Dorrington presented the Board with a summary of the PTCS Report. She stated that, since the February 9, 2026 Board meeting, there had been five (5) suspect releases, four (4) of which were confirmed. Two (2) releases were resolved, and of the two (2), one (1) was eligible. In addition to this, there were ten (10) releases that were in the closure review process at present, and of these ten (10), four (4) were eligible releases. She stated that this meant they were being routed through section management for review of the release closure packet. For overall activity, there had been 4,901 total confirmed releases, 3,996 total resolved releases, and 905 total open releases. Of these 905 total open releases, PTCS was responsible for managing 854 of them, while 586 of the releases were Fund-eligible, 86 were ineligible, and 185 had either not applied, had a pending application, had been withdrawn, or were suspended. Additionally, as of the start of 2026, 50 Legacy Release Reminder Letters had been sent, 39 WP request letters were sent, 34 of which were for eligible releases, and 27 WP approval letters were sent, 22 of which were for eligible releases.

Ms. Kline asked Ms. Dorrington for an explanation on what was a legacy release. Ms. Dorrington stated she believed it was any release discovered prior to the year 1990, which she later corrected was actually a release discovered prior to the year 2000.

Ms. Kline asked if the 50 legacy release reminder letters that were sent encompassed the total open legacy releases that existed at the time, or if there were more legacy releases outside of the ones for which the letters were sent. Ms. Dorrington answered that there were more legacy releases than this, and that these letters were sent out each month based on the release's month of discovery. Releases with a January discovery date had their respective reminders sent out in January, and so forth.

Ms. Kline asked what the rate of response was to the reminder letters. Ms. Dorrington answered that she believed the response rate had been around 50%. Miss Kline asked if the 50% applied to the 50 letters mentioned in this summary, or to the cumulative total of reminder letters that had been sent out for legacy releases. Ms. Dorrington stated this related to the 50 sent out this year, as around 25 of the recipients who received these letters had reached back out to the Department to ask how the release could be moved along. She stated that the ones that had not yet responded would be contacted again at a later date.

Ms. Kline noted that a reoccurring problem would be if the owners had changed for some of these legacy releases and the Department's records had not been provided current owner information. She asked if the Department had run into issues where some of the reminder letters had ended up undeliverable. Ms. Dorrington answered that this could be the case for some of the letters. She noted that, in other cases, the former owner who received the letter had reached out to let the Department know they no longer owned the property, after which research would be done to find the current owner. She stated that, in other cases where the letter was not delivered, the Department did not know if the letter was delivered to the right person if they never hear back from them.

Ms. Kline asked if the legacy releases on file were considered a low priority. Ms. Dorrington stated that while it varied, a majority would likely be lower priority. She stated this was because when a release was higher priority, it was usually due to a threat or risk caused by the release. However, with over 900 currently open releases, there were occasional cases where something could fall through the cracks. The Department would be moving the release forward if the risk was high enough.

She stated that, because of this, the Department was working hard to shift the section focus and was hoping to do so with a standard being developed alongside the Environmental Protection Agency (EPA). The new standard accounted for threat analysis, and research was being done to see what releases had real or perceived threats to human health or the environment. Because of this, high risk releases were the ones that were getting the most attention by the Department to be moved forward. Meanwhile, lower risk sites were being worked on to be brought towards closure wherever possible. Legacy releases with high risk levels would quickly receive WP request letters.

Ms. Kline noted that, in her over five (5) years working for the Board, the total amount of open releases always appeared to stay around the same total, and that the amount never appeared to decrease. Ms. Dorrington thanked Ms. Kline for noting this and stated that this had just been discussed at the recent consultant's day conference. She stated that there had been a new standard established to help with this called "Moving Sites to Closure" (MStC) as it was an issue not only in the State of Montana but had become a problem across the United States. The EPA was in support of this standard, as one of their headquarters' representatives had led the way in helping develop the standard. The standard had been published in May 2025, and Ms. Dorrington and many of the PTCS staff members had been on the workgroup for many years. As soon as the standard had been published, the Department had been working to see how it could be implemented in Montana so that more releases could be brought to closure. There had already been a standard for site closure; however, the new standard had been developed in order to supplement the old one. This was accomplished by factoring pathways to closure in addition to the risk analysis. She stated that, at present, the state of Montana did not have a way to do this efficiently due to the statute and rules. Site closure methods were limited at present. Because of this, the Department was looking to propose rule changes in the coming year. All the stakeholders involved would be brought into this process, and it was to address the very thing Ms. Kline had asked about, which was to prevent stagnation on release closure. Because of this, much communication and work were being done to implement these changes in rules by the start of the next year.

Mr. Monahan asked Ms. Dorrington if the 50 legacy release reminder letters were what in turn prompted the 39 WP request letters to be sent out. Ms. Dorrington stated that the two categories were separate. The legacy release reminder letters reminded property owners that they had a longstanding release at the facility, while the WP request letters informed owners they were required to produce a WP by a certain date. This was what usually generated the WPs the Department would receive, as the Fund would generally need to see this letter to guarantee reimbursement for the site. Because of this, reminder letters were not the only thing sent out, as there would be a WP requested of and required by the owner later. The WP request letter informed the owner of the work that was required to clean up the property.

Mr. Monahan asked if the time deadline for the WP request letter depended on the severity of the release. Ms. Dorrington answered that she believed this was pretty standard, and that if there were releases with risk, there generally was and could be an accelerated timeline requested for such cases. She stated that to hurry these cases along, the Department had other funding sources such as LUST Trust or special legislative funding that could sometimes be used to quickly address high-risk releases. Because of this, the timeline often was dependent on risk level.

Mr. Monahan noted that sites eligible for the Fund were the majority, with 854 releases in this category currently open. He asked how many of these 854 sites had active WPs. Ms. Dorrington answered that this information could be retrieved at a later time and included in the next Board meeting packet or sent to Mr. Monahan. She stated that these releases were eligible and should have been moving along, but there were times when this could end up getting impeded.

Mr. Monahan asked how the Board staff could contact an owner that had an eligible release that might or might not have a WP, and if there was an avenue for the Board staff to get in touch with such people or if this was a request that had to come directly from the Department. Ms. Dorrington answered that the WP request had to come from the Department, but that it was beneficial if the Board staff were communicating with owners about their eligibility, what it meant, and how work could move forward. She added that she believed this kind of communication was always beneficial because it allowed for communication from multiple parties and built up a holistic viewpoint of the process to the owner.

Ms. Kline request to have the information that Ms. Dorrington was going to send back to Mr. Monahan to be included in the tables for the future Board packet. Ms. Dorrington stated this could absolutely be done, as a category detailing how many of the releases had active WPs could be added under total Fund eligible releases. Ms. Kline noted that there was already a lot of data available, but that the tables could still be expanded in these reports to include more of this information, as it was helpful to the Board. Ms. Dorrington stated that a way to detail this category would be to add it as the number of WPs that had been approved by the Department. She noted that, as far as if it could be detailed how many of these WPs were Fund-eligible was another question, but that this could also be added as a category.

Mr. Monahan stated that Ms. Latysa Pankratz, Section Supervisor, PTCS had done an excellent job providing the numbers for the PTCS report.

AAA Storage, Facility #25-08847, TID 17125, Rel #3840, WP #716834839, Helena, Priority 3.0

Ms. Dorrington provided the Board with a summary of the WP over \$100,000. Mr. Douglas Byrd was the responsible party for Release 3840, and had retained Tetra Tech, Inc. (Tetra Tech) as their environmental consultant. Tetra Tech submitted a cleanup WP on behalf of the owner that proposed expanding the existing in-situ chemical oxidation system using Cool-Ox® injectate to remediate soil and groundwater followed by groundwater monitoring. The estimated cost for the WP was \$142,137.85. The Department approved the plan.

Ms. Dorrington stated that there had been a Release Closure Plan submitted before the WP, in which the best path towards closure was proposed. This was submitted in December 2023. Tasks that had been looked at during this time included monitored natural attenuation, in-situ oxidants and additional units of such, nitrogen infusion, and no action. Based on the site's data, it was decided that in-situ oxidation was the most efficient choice for remediation. The facility was in Helena in a relatively populated area. An initial remedial investigation had been conducted in 1999 and 2000, during which an out-of-use gasoline UST was discovered at the facility, with further investigation and cleanup activity having occurred regularly since. Cleanup strategies had included in-situ oxidant injection and a soil-vapor extraction (SVE) system.

Ms. Kline asked if the storage unit at the site had been part of the original facility, or if the property was something else before this. Ms. Dorrington stated she was imagining the property was something else previously, but that she believed Tetra Tech might have a more comprehensive picture of the site's history if anyone from the company was present to speak.

Ms. Rhianna Reed, Environmental Consultant, Tetra Tech, introduced herself to the Board. She stated that, to answer Ms. Kline's question, the facility had once been a construction company that had installed a UST prior to the year 2000. When the property was sold, it was changed to be a site for storage units, but the existence of the UST was never disclosed to the new owners and no records existed on the tanks. She stated she was in possession of a detailed site history should the Board desire more specific details. The site with the release was adjacent to the current Northwestern Energy facility. Said Northwestern Energy facility was also a site with a release that had been under long-term remediation and investigation. Because of this, the release at the AAA Storage facility had been found when trying to locate the contamination at the Northwestern Energy property.

Mr. Monahan asked if the contamination at the Northwestern Energy facility was for a separate release that was not part of the WP being discussed. Ms. Reed stated this was correct, as the release being discussed was the one at the AAA Storage Facility. Mr. Wadsworth added that he believed the investigation at the adjacent property had not been solely for petroleum at that facility. Ms. Reed confirmed this was correct.

Mr. Wadsworth noted there were other chemicals of concern when it came to electrical company facilities. Mr. Monahan asked if this meant that the neighboring release was a type of contamination found that would have originated from the Northwestern Energy property. Mr. Wadsworth stated this was so, as he noted that electrical transformers had chemicals that were a subsurface contaminant that could extend for some distance. He stated that, while he was not familiar with Northwestern Energy's property, he believed he remembered from looking into this property that there were other chemical constituents from Northwestern Energy that were not petroleum. Because of this, he noted that when Ms. Reed referred to the release at Northwestern Energy, she had been referring to a release consisting of a variety of chemicals that were not petroleum when they found the petroleum release at AAA Storage.

Mr. Wadsworth presented the Board with a summary of the Board staff comments on the work plan over \$100,000. He stated that the Board staff were required by law to require three (3) competitive bids for work that was greater than \$2,500. In these cases, at least three (3) bids would need to be obtained from three (3) different companies to compare prices on items such as hydrogen peroxide-based technologies. The WP proposed the injection of Cool-Ox®. Mr. Wadsworth noted that, given the product information, Cool-Ox® was a hydrogen peroxide-based technology, but it was not the only product of its kind available. Additionally, the WP had proposed injection of the product into wells where the contamination did not exceed 1,000 micrograms per liter (ug/l) of benzene. Because of this, the Board staff recommended nutrient injections into wells where benzene concentrations fell below the 1,000 ug/l mark rather than the more expensive product Cool-Ox®. Hydrogen peroxide products were generally used where anaerobic degradation was occurring within the plume. Such processes occurred when the concentrations between 5,000 and 9,000 ug/l of benzene in the plume. Because of this, the product would normally not be proposed for injection in something where the contamination was around 1,000 ug/l or less.

The Board staff also had other comments. The consultant was planning to take an equipment blank, which was not something commonly obtained for petroleum-contaminated sites. Because of this, the Board staff saw no reason for the collection of or the analysis of the equipment blank and did not recommend the reimbursement of this. The WP stated that water level measurements would be taken from all wells on the site, but the Board staff did not see the necessity for taking this from every well at the site. The Board staff only saw a necessity for fluid measurements at wells that were being sampled, as well as at the four (4) wells where injection would occur. Outside of this, the Board staff did not see any need for the water level measurements. Deep Earth Technologies, the manufacturer of Cool-Ox®, had provided a quote that indicated the price for the scope of work didn't change with the amount of product that was injected. Because of this, the prices for this proposed subcontractor were not scalable, which made the competitive bid process even more important. The Board staff recommended a hydrogen peroxide-based technology only be introduced into about a third of what was the proposed scope of work. Because of this, the cost of the Cool-Ox® should be a third of what was proposed, but the competitive bid from Deep Earth Technologies was non-scalable. The consultant's December 2023 report's Release Closure Plan identified four (4) possible remedies for the release in the remedial alternatives analysis. The least expensive remedy was estimated at \$50,000. This technology also had the same time to closure as what is being proposed in this work plan's scope of work that cost \$140,000. Because of this, the Board staff did not see any reason why the cheaper alternative should not be taken. Because of this, the Board staff recommended the consultant reconsider the activities planned for the site.

Mr. Monahan noted that the WP cost sheet said the WP's total cost was \$44,480.30, but the estimated cost in the summary stated it was going to be \$142,137.85. Mr. Wadsworth stated that this was because the \$44,480.30 estimate did not include the cost of injections. The cost of the injection work and associated injectate, which has been a topic of this WP discussion was over \$2,500, which requires by law a competitive bid on both the work and the product for which no competitive bid was provided. Because the consultant did not provide a competitive bid on these costs which is required by law, neither the work nor the product can receive reimbursement and therefore those costs have been zeroed out of the estimate. He stated that the original cost with injections factored in would have been in the \$80,000 range. However, this amount would then be cut to a third of what was proposed because of limiting the injection to areas where Hydrogen peroxide products have been shown to be cost effective, despite the fact that the Cool-Ox® proposed costs are not scalable.

Mr. Monahan asked why the Cool-Ox® costs were not scale able, and if mobilization was a factor as to why. Mr. Wadsworth stated this was part of it, as the vendor company's crew would have to travel to the site from Chicago with their equipment regardless of the amount that was injected. He stated that this was why the Board staff wanted a competitive bid on the product and services, as it was expensive for the crew to travel from Chicago. He stated that a company that performed hydrogen peroxide injection could be found in the state of Montana, and that while the owner wasn't barred from hiring Deep Earth Technologies from Chicago, the Board staff would not reimburse these costs that were not competitively bid.

Mr. Monahan clarified that it wasn't that the Board staff would not, but rather that they could not reimburse such costs by law. Mr. Wadsworth stated that the Board staff required a competitive bid on such costs but also were required to have evidence that the costs were reasonable and necessary of responding to the release. Competitive bidding helped ensure the costs were reasonable.

Mr. Monahan asked if he was correct in understanding that it was three (3) competitive bids. Mr. Wadsworth confirmed this was so, and that it was important to note that the three (3) competitive bids were something required under law. He stated that, in the past, there had been a consultant that solicited three (3) bids: one from his cousin, one from his coworker, and one from his neighbor. The law requires three (3) competitive bids not just 3 bids. If the consultant solicited 3 bids and this was no bid, no bid, and a bid, and the Board staff deemed that the single bid was too high, the Board staff had the ability to reach out and obtain their own competitive bid from a third-party contractor. If the Board staff's bid came out lower than what was proposed, they would adjust the allowed reimbursed on the WP's task to the amount of the bid that the staff had received. If another project had similar work being done at a different price, this could also be a point of comparison that the Board staff would have available to determine reasonableness. He stated, for example, there had been a time where it had been difficult to obtain excavation contractors in eastern Montana due to the Bakken oil boom. Because of this, it had been difficult to obtain competitive bids at that time, and the bids obtained were generally reasonable compared to the prices common on the market at the time. Mr. Wadsworth noted that, in this scenario, there was no competitive bid, but the Board staff required a competitive bid. There was only one subcontractor chosen and the costs did not appear to be reasonable and staff believed funding could be saved.

Ms. Kline asked if there had been any results obtained from the previously installed in-situ oxygen treatment and SVE at the site. Ms. Reed stated she was unsure, as the site summary had been brief and she had not been the one who prepared it. She stated that Tetra Tech had been assisting the site since the year 2000, and there had been SVE and air sparging devices operating at the site as well as extensive remediation conducted over the past twenty plus years. The site had reached a point

where the previous strategies were not useful anymore, and product could no longer be extracted economically using such methods. A previous manager at Tetra Tech had built a series of wellhead base systems where dissolved oxygen was being constantly injected into the dedicated wells. Three (3) of these devices had been installed. Ms. Reed noted that, when she had come into the picture for the project, regional groundwater levels had dropped. Because of this, some of the wells were dry, while other well screens were now submerged. It was because of this that results were not able to be obtained anymore using the current technology.

Ms. Kline noted that it seemed like the release had been a big spill. Ms. Reed stated that it appeared that the release had occurred as a slow leak from the tank over time. Ms. Kline noted that it looked like the site had been developed on top of the tank. Ms. Reed confirmed that development had occurred around the tank. She stated that difficulty arose from a natural gas line that ran parallel to the storage units at the site. Because of this, it had also been difficult to excavate and install devices beneath the surface because of those subsurface utilities.

Mr. Monahan stated he had two (2) questions. First was that Mr. Wadsworth stated there had been four (4) different remedial alternatives suggested, one of which was for \$50,000, and was wondering why the \$50,000 remedial alternative had not been chosen. Ms. Reed answered that this was because the cheaper option would have taken more time, thus drawing out the remediation process even longer before the site could reach closure. Mr. Monahan's second question was that well injection had been discussed in regard to a different site at the previous Board meeting and he noted that the Department had stated at that time that injectate could not be put into wells. Mr. Wadsworth indicated that Mr. Monahan was correct. As Mr. Wadsworth remembered, that the Department stated that they would not approve the introduction of a product into monitoring wells. He noted that in this circumstance that although the WP proposed the "injection" of Cool-Ox® into the wells, that what was really being proposed in this case was actually an "introduction" of hydrogen peroxide product containing nutrients into the wells rather than injection. It is important to note that although the Department would not allow introduction of a product into existing site wells for a site discussed at the previous Board meeting, the Department had approved the introduction of this product into existing wells at this site.

Mr. Wadsworth also noted that, in the September Board meeting, the Board staff had also suggested that hydrogen peroxide was better for higher concentrations of contaminants. He stated it was not good to inject hydrogen peroxide into a plume for which there was aerobic biodegradation occurring because it would kill the bacteria causing the aerobic activity to occur. Because hydrogen peroxide was an oxygenate, it broke covalent bonds and the carbon bonds between the petroleum and the soil but it killed the aerobic bacteria. It does provide oxygen to the subsurface but as a radical molecule that damages bacteria. Even though it disrupted aerobic bacterial activity, he noted that the product benefited anaerobic processes, as it broke the bonds that the anaerobic activity needed to have broken in order to consume the petroleum. This was why hydrogen peroxide benefited the sites where the concentrations were higher. However, aerobic activity was what occurred when there were lower concentrations, which was why the Board staff had suggested nutrients below 1,000 ug/l. This was also why the recommendation was made to reduce the amount of hydrogen peroxide to be used at this site to a third of the proposed amount, as only a third of the wells were above a level of contamination where it would be effective. He noted that, at the September 20, 2025 Board meeting, the board staff had recommended the introduction of nutrients, which were mostly nitrogen and sugars, into a well with lower contamination because of this. With this method, there was no scaling that occurred at the wells, but the Department did not approve the proposal. Meanwhile, he noted that the Department had approved this WP with the introduction of Cool-Ox® into the wells.

Mr. Monahan asked what the difference was between the release discussed in September 2025 and the current one. Mr. Wadsworth stated that the Board staff's recommendation for the September 2025 release had been for nutrients, while this proposed WP was for hydrogen peroxide-based technology, which included nutrients. He stated that, because of this, there was not much difference between the work plans for the two releases.

Mr. Monahan asked Ms. Dorrington if she had an answer to this question. She stated there were about six (6) different, highly technical topics that Mr. Wadsworth had just brought up. She stated that, if the Department could have Mr. Wadsworth's comments in writing to submit to the project's consultant, this would benefit the Department. She added that, as for what she could address, she could provide insight on the issue relating to nutrients versus Cool-Ox®. The main difference was that, for nutrient injections into wells, either the EPA or Department had to approve the task. The reason for this was because they did not want an accidental introduction of nutrients with nitrates in a well to enter drinking water wells or other wells. Because of this, health and safety were a concern. Another concern was the biofouling of monitoring wells, as wells became unusable or unreliable if these things were introduced, and new monitoring wells would need to be drilled. She added that, in this case, because of the usage of Cool-Ox®, what was being proposed, and how it was administered, biofouling of the well would not be a concern with this process. She stated she would have to look at the WP to check and see if nutrients were viable at all alongside the Cool-Ox®. She noted that the discussion was moving in many directions, all of which were very technical. She

added that, when it came to the 1,000 ug/l contamination levels as a cutoff on benzene, she would need to see a source on this information and the science behind it, as it was not a policy number from the Department. Because of this, she would need to know what the Board and Board staff's policy was on the use of Cool-Ox® in areas with this level of benzene concentration, and why 1,000 ug/l was the cutoff being used. She stated that, because of this, it would be beneficial to both the Department and consultants to have this information in writing.

Mr. Monahan suggested that Board staff speak with the Department and consultant and return with a WP that could be acceptable and would not need to be brought back to the Board for discussion and sit longer in wait for the next Board meeting. Ms. Dorrington said that the WP was approvable from the Department's perspective at this point, and that the technical details and the three (3) competitive bids were something they approved doing correctly. She noted that the competitive bids would be on the Board staff's end in terms of time. She added that what she wanted to see was a written document stating what the Board staff's position for Cool-Ox® usage was, as well as the 1,000 ug/l benzene cutoff and the science behind it. In addition, she stated that she wanted to see what the Board staff's position on Cool-Ox usage in relation to aerobic and anaerobic bacteria, and which one the Board staff had been simulating with the low-concentration wells, as well as the nutrient usage and what the Fund would reimburse for it. She noted that 5 MCL benzene concentration was the maximum amount the Department wanted to see present at site before a release could be closed. The site was in the middle of Helena, and could be near sensitive receptors, exacerbating the priority of cleanup. Because of this, it would be helpful for the Department to understand more of the Board staff's position on this, and if the 1,000 ug/l benzene concentrations were a legal standard the Fund was held to, the Department would need to know.

Mr. Monahan asked if the WP had already been approved by the Department. Mr. Wadsworth stated that, to his understanding, the WP had been approved on March 1, 2026. Ms. Dorrington stated that this was her understanding as well, and that this was why it was coming before the Board.

Mr. Monahan stated that he had some confusion, as there were three (3) different entities involved in the decisions on the WP. He asked how the Department approved a WP if the three (3) competitive bids had not been obtained, or if the Department needed to look at competitive bids at all before the approval of the WP. Ms. Dorrington answered that there were two (2) different, important components of this. She stated that the Department looked at the technical details of the WP and whatever the owner was submitting to move the release towards closure, and in a timeframe, depending on the time or risk, that the Department deemed as appropriate. When the Department obtained a WP, they were looking at whether the activity was moving the release forward, was it reasonable to move forward, and would it meet all of the Department's objectives. She stated that these objectives that the Department looked for in a WP were outlined in rule. After the Department approved the WP, the Fund looked at the WP to determine the reimbursement side of the WP, such as if it could be reimbursed, if competitive bids were in place, and if remediation alternatives had been looked into. Ms. Dorrington stated that this was why she wanted to see the policies behind how the Board staff suggested alternatives for certain tasks, and why she had requested a summary of this in writing so that the Department could be aware of them.

Mr. Wadsworth stated that the Board staff had provided their sanitarian review comments on the WP, and that because of this; the case manager for the Department did already have the comments from the Board staff about the 1,000 ug/l threshold. He stated that, everything that he had stated at this Board meeting could be found in writing within the Sanitarian review comments. Ms. Dorrington stated that she had seen these and thanked Mr. Wadsworth for them, but that her question was whether there were policies behind some of the Board staff's decisions. This way, when the Department reviewed the WP and its funding, it could be done with the perspective of what the Board could and could not reimburse. Mr. Wadsworth stated that a Board staff questions database, which included the information behind the 1,000 ug/l cutoff, had been provided to Ms. Amy Steinmetz, Division Administrator, for the Department. Ms. Dorrington stated that she would still want to see in writing a summary of the policies behind these decisions and what governed them. Mr. Wadsworth stated this could be done.

Ms. Reed stated that, as a point of clarification, she appreciated the explanations that had been provided here, as she had not been able to see the Board staff's comments until after she had already received the WP approval letter. Because of this, she had not been able to adjust Tetra Tech's comments in a timely manner but stated that she had answers as to the rationale behind the decisions made when Cool-Ox® had been selected as the preferred remediation technology. She stated that she wanted to improve communication between Tetra Tech's team and the stakeholders moving forward. She asked if the inclusion of the WP's task cost summary included in the packet was a final number for what the Board staff would approve for reimbursement, and if the WP could be rescinded and modified. Mr. Wadsworth stated that, as far as the Board staff was concerned, they would like for Tetra Tech to take another look at the WP and help the owner come up with a strategy that the Board staff would be amenable to reimbursing. He stated that, the more all parties were on the same page, the less costs the owner would incur.

Mrs. Dorrington stated that it was worth noting that, as Ms. Reed had noted with the period for commenting being oddly placed, Mrs. Steinmetz was working to find a better way to streamline this issue. She noted that Mrs. Steinmetz had been in communication with Mr. Wadsworth and eventually Mr. Monahan to find a way to sort out these time discrepancy issues, as the Department knew this was not the most efficient way. She noted that she believed everyone recognized this, and that the Department was working to increase communication and make the process better for everyone involved, with consultants and owners at the forefront of these considerations.

Mr. Monahan noted that there was going to be a meeting related to this later in the afternoon and asked if Mrs. Dorrington would be present for this discussion. Mrs. Dorrington stated that she would not be present but was confident that good strides would be made at this meeting. Mr. Monahan stated that the Board was for anything that improved the process.

Public Forum

JM is John Monahan, BL is Brad Longcake,

BL: Mr. Chairman, members of the committee, just for the record, Brad Longcake. I'm here on behalf of the Montana Petroleum Marketers and Convenience Store association. My members are the guys that are out working both as associates installing these items as well as the owner operators that are utilizing the fuel. Just a couple quick comments- um- somebody had mentioned earlier if that Form 13 had been reviewed in Vegas, and it was. I did have a meeting with our members that were there. We went over the common questions that- um- have been put together by the Board as well as the form. I have sent that out to multiple members in between then, and, like, I think Mr. Wadsworth mentioned, we will have PTRCB staff there at our convention this summer in June in Fairmont going over this again. We want to try to get as much awareness around this process as to utilize it to the best of everyone's ability. I think it's a great opportunity for- uh- not only the Fund, but also the owner operator and the consultants that are doing these inspections. The second piece, just to quickly touch on- uh- several people touched on this- myself and one of my board members from the petroleum Board met with Amy Steinmetz and her team to kind of go over and just review the process where everybody's trying to find ways to make this a much more seamless process for everyone- consultants, owners, PTRCB as well as the staff, and DEQ. And- and we found some areas I think that we can make some improvements on. It sounds like- um- Mr.- um- John is going to be able to go and participate in this legislature with others. I think it is a great opportunity to look and see what each side's doing- um- and I think there are some ways that we can improve this. So, again, we just want to make this process easy for everybody. Everyone has the same goal, which is to protect the citizens of Montana and clean these sites up as quickly as we can and utilize and maximize the Fund to its full potential. So, with that, Mr. Chairman, that's all of my comments for the day. Thank you for the opportunity. I appreciate everybody's hard work on this. I know it sometimes can be challenging, but- um- we're all working together, and I appreciate the opportunity, so thank you.

JM: Perfect! Thank you, Brad. Any other comment for the Public Forum?

There was no further discussion at this time.

The next meeting is scheduled for June 22, 2026. The place of the meeting will be sent out to all parties and published on the website.

The meeting was adjourned at 11:33 a.m.

Signature - Presiding Officer

Executive Summary
Zip Trip #39 – Kalispell
Facility ID #15-03915 (TID 20624), DEQ Release #4392
Work Plan #716835047

DISPUTE OF ADJUSTMENTS TO CLAIM #20251010A

TYPE OF ACTION: Dispute of staff adjustments to Claim for Reimbursement of costs for activities performed by the owner’s consultant, Water & Environmental Technologies (WET), and subcontractors Hammerquist Casalengo, Matson Trucking & Excavating, and Westmor Industries LLC.

ACTIONS REQUESTED: The owner requests that the following items be added to the agenda to be addressed before the Board:

- 1) On March 10, 2026, the staff recommended a decrease to \$91,754.91 and we don't understand why. It looks like staff is only recommending payment of one of the Matson invoices.
- 2) On April 20 and April 28, Cenex Zip Trip's consultant wrote to the PTRCB staff asking how the recommended decrease was determined and our inquiry was neither acknowledged nor responded to.
- 3) A third invoice from Westmor for \$11,250 was recommended as denied, and the explanation given was that the cost was disallowed because, "water handling was not included in the work plan email..."The invoice noted that it was for labor related to soil contamination. Pumping water was listed on the invoice but as explained above the soil was saturated. Water was mixed in with the soil, so in order to remove the contaminated soil, some amount of a watery mix, with a trash pump had to be addressed. I think if the staff had known this was the situation, the Westmor invoice would not have been denied.
- 4) A reduction of \$5,216.05 was also recommended for Project Management, although Cenex submitted the invoices. Staff should have asked for further information as outlined in ARM 17.58.341(4). Staff did not respond to Cenex's inquiries sent on April 20 and 28, 2026.

BOARD STAFF RECOMMENDATIONS: The Board staff recommends as follows:

- 1) Reduction of the Project Management activities totaling \$5,216.05 for the following reason:
 - a. Project Management exceeds the established standards set forth in ARM 17.58.341.
- 2) Soil Removal was reduced to allowed reasonable rate per yard for 500 yards totaling \$55,104.14 for the following reasons:

- a. Board statistical analysis indicates that a reasonable per yard cost of \$68.00 per yard for excavation of soil volumes in the amount of 500 cy in 2023, Board staff allowed \$75.00 per yard.
 - b. The Board will not reimburse for tiered subcontractor oversight (i.e., subcontractor oversight of an additional subcontractor. Hammerquist Casalongo invoices for supervision, project management, equipment coordinator and associated mobilization).
- 3) Cost not allowed for water management associated with excavation totaling \$13,336.00 for the following reasons:
- a. Water handling was not included in the work plan email that received Department approval as required by statute (75-11-309(1)(h), MCA).
 - b. A change order (Form 8), which is the formal, legally binding document that amends an existing work plan was NOT submitted for the water handling and for approval by the Department.
 - c. There is no DEQ approval for water handling as required by statute (75-11-309(1)(h), MCA).

ISSUE: The owner disputes the adjustments made to the claims. The adjustments are related to Project management, mobilization, soil removal, water handling, fieldwork oversight, lab analyses, data validation summary forms, and report preparation. It appears the owner is not disputing adjustments to mobilization, fieldwork oversight and lab analysis.

BACKGROUND: There was communication between the consultant and PTRCB staff trying to get information to process the claim over a period of several months. Board staff have explained their position on the denial of the reimbursement, however, the owner requests review by the Board. The Board staff believes that the charges should be denied, for the following reasons:

- Project Management – Project Management activities are reduced to the allowed Project Manager labor rate. Project Management exceeds the established standards, as set forth in ARM 17.58.341. There are some rates for project management charged at the senior rate which are not considered reasonable or necessary.
- Mobilization – Labor related to mobilization was reduced to the allowed rate for the task and the associated vehicle mileage rate reduced to allowed per mile vehicle rate. Some of the rates for mobilization were charged at the senior rate which are not considered the appropriate level of professional, and not reasonable. Senior rate reduced to staff rate.
- Soil Removal – Soil Removal - Reduction to allowed reasonable rate per yard for 500 yards. Based on other soil handling costs for 2023 which is the year the work was done. In addition, the adjustment includes costs that cannot be reimbursed for subcontractor supervision of a subcontractor (tiered management, ARM 17.58.342).
- Water Handling – Water handling was not included in the work plan email. No Change order (Form 8) was submitted for water handling, nor was the water handling activities approved by DEQ. Costs not that do not receive approval by DEQ before the work is performed cannot be reimbursed by statute (75-11-309(1)(h), MCA).

- Fieldwork – Fieldwork oversight reduced to allowed level of professional (ARM 17.58.341). Fieldwork oversight reduced to labor necessary, excluding cost properly allocated to project management and water handling. There are some rates for fieldwork charged at the senior rate which are not the appropriate level of professional and are therefore not considered reasonable. Note: the adjustments were made based on 500 cy, yet CHS only had approval for 400 cy. If based on 400 cy the adjustment would have been approximately 20 percent larger.
- Lab Analysis – Lab costs associated with tank installation samples were denied. These samples are not associated with contaminated soil removal work plan but rather with the installation of the new tank system.
- Markup on Lab – Markup of laboratory invoices are not considered to be reasonably incurred so any markup of vendor invoices was denied, ARM 17.58.342(2)(f).
- Data Validation Summary Forms – Claimed costs exceed reasonable and necessary cost for this task. Reduced to allowed hours for data validation summary forms based on the number of allowable sample data sets.
- Report Preparation – Report preparation costs exceed the established standards as set forth in ARM 17.58.341. Reduced to allowed cost for the year the report was produced.

CHRONOLOGY:

- AUGUST 24, 2023 DEQ was notified that petroleum contaminated soil was found at 305 E Idaho Street (Fac. 15-03915) in Kalispell.
- AUGUST 24, 2023 DEQ approved removal of 300 cy of contaminated Soil, laterally and vertically limited by PID, stockpiling soils, sample collection, and a cleanup report. WP and Approval. (note no water handling).
- AUGUST 29, 2023 Phone call between Sarah Lupton of WET and DEQ confirming that the excavation for the area to set the tanks and remove petroleum contaminated soil is done.
- AUGUST 29, 2023 DEQ emails CHS and others indicating approval of removal and disposal of an additional 100 cubic yards and stockpiling on visqueen, and additional confirmation samples (*i.e. approval of a total of 400 cy and associated sampling and disposal, not 500 cy*). **Note, approval of the additional 100 cy in writing was accomplished after the work had been done and that there was no approval for a total of 500 cy.**
- AUGUST 30, 2023 Email from Sarah Lupton of WET to DEQ confirming activity at the site and that removal of petroleum contaminated soil is done. **No mention of water management.**

JUNE 7, 2024 DEQ issued a notification letter to owner that Release 4392, originally resolved November 3, 2009, was recategorized as active based on historical petroleum contamination identified during on site work in 2023.

JANUARY 14, 2025 WET sent email to PTRCB notifying of the excavation that took place in **2023**. They wanted to submit claims for the cost incurred and were seeking assistance.

FEBRUARY 14, 2025 PTRCB sent email to WET requesting clarification and evidence for which release at the facility the found contamination was associated with and requested work plan identification information in order to provide assistance WET with the process to complete and submit the claims.

FEBRUARY 20, 2025 WET sent PTRCB information stating that based on sample results from the new tank basin release 4392 was reopened. However, no evidence or work plan ID was provided.

MARCH 5, 2025 WET was checking back on how to file a claim. Yet PTRCB staff had not received any supporting information of work plan identification.

MARCH 6, 2025 PTRCB email to WET (and DEQ case manager) inquiring about a release identification number, the work plan for the activities that are at issue and the associated WP ID.

MARCH 11, 2025 Email to DEQ case manager inquiring about a work plan identification number and the criteria used to establish what soils were removed.

MAY 16, 2025 DEQ case manager provides Facility ID, Release ID, Work Plan ID and the Email that constituted the Department approved of corrective action contained in the email and considered to be the plan.

MAY 30, 2025 PTRCB communicates with WET on claim submittal for costs of site activities.

OCTOBER 10, 2025 PTRCB received claim #20221010A.

DECEMBER 10, 2026 PTRCB notifies WET of claim documentation deficiencies.

DECEMBER 12, 2026 PTRCB requests landfill documentation.

JANUARY 5, 2026 PTRCB requests clarification on subcontracted costs. (Tiered oversight)

JANUARY 7, 2026 Consultant provides contracting arrangements.

JANUARY 7, 2026 PTRCB requests clarification on what activities were performed for excavation of contaminated soils and water handling.

JANUARY 7, 2026 WET informs PTRCB that they are seeking additional information from their client, CHS.

JANUARY 12, 2026 WET provides PTRCB information on soil removal and oversight by the contractors.

JANUARY 29, 2026 WET asks PTRCB if the Claim will be addressed at the February Board meeting.

MARCH 10, 2026 Recommended adjustment notice sent to owner and others for claim #20221010A. Included deadlines for April and June Board meetings.

MARCH 20, 2026 WET asks for clarification on the water handling adjustment.

MARCH 23, 2026 Mr. Alford requested additional time to review recommended adjustments.

MARCH 23, 2026 PTRCB informs WET and CHS about the details associated with the water management, the activities conducted by both Westmore and WET, that water handling was not part of the scope of activities approved by Department. That the standard work plan procedure outlined in statute (75-11-309, MCA) whereby the proposed activity and the budget would be reviewed by stakeholders, including PTRCB, was not followed. Indicating that activities that did not receive approval before being conducted were not reimbursable by the Fund.

APRIL 20, 2026 Cenex Zip Trip's consultant wrote to the PTRCB staff asking for information concerning adjustments to project management and soil removal.

APRIL 28, 2026 Cenex Zip Trip's consultant wrote to the PTRCB staff asking for information concerning adjustments to project management and soil removal.

MAY 15, 2026 WET requested confirmation that claim #20251010A will come before the board at the June meeting.

MAY 20, 2026 PTRCB notified all parties involved of the needed information in order for the claim to be disputed at the June board meeting.

MAY 29, 2026 Electronic and hand delivery of the required notice from the owner that they want to dispute a claim.

BOARD OPTIONS:

- ✓ Ratify the staff recommendation.
- ✓ Reject the staff recommendation, propose an alternative and provide rationale for decisions.

STATUTES AND RULES:

75-11-309, MCA, Procedures For Reimbursement Of Eligible Costs -- Corrective Action Plans

75-11-309(1)(h), MCA, Procedures For Reimbursement Of Eligible Costs -- Corrective Action Plans. (h) The owner or operator shall implement the corrective action plan or plans approved by the department until the release is resolved. The department may oversee the implementation of the plan, require reports and monitoring from the owner or operator, undertake inspections, and otherwise exercise its authority concerning corrective action under Title 75, chapter 10, part 7, Title 75, chapter 11, part 5, and other applicable law and rules.

ARM 17.58.341, Reimbursable Costs

ARM 17.58.341(4), Reimbursable Costs -- Board staff may request a detailed explanation of rate structures when a submitted rate appears to vary significantly from those submitted by other consultants/contractors/subcontractors for the same code. Board staff may refuse to use rates that significantly vary from similar rates submitted by others, rates from persons who have not submitted claims for reimbursement, rates from persons who have not submitted proper documentation for claim reimbursement, and other rates not deemed acceptable by the board.

ARM 17.58.342, Other Charges Allowed or Disallowed

ARM 17.58.342(2)(f), Other Charges Allowed or Disallowed -- The following list indicates, by way of example and not limitation, types of charges that are presumed not to be reasonably incurred: markups, add-ons, or profit added to vendor or subcontractor invoices, except as allowed under (3)(c);



Petroleum Tank Release Compensation Board

PO Box 20090 Helena MT 59620 -0902 (406)444-9710

<http://deq.mt.gov/cleanupandrec/programs/ptrcb>

March 10, 2026

CHS Inc - Spokane (OWNER)

Jim Alford

4407 N Division Suite #300

Spokane, WA 99207

Location

Kalispell

Facility ID

1503915

Facility Name

Zip Trip 39 formerly
Noons 437

SUBJECT: Recommended Adjustment(s) to Claim for Reimbursement

The Board staff has proposed the following adjustment(s) to this claim and has temporarily suspended it to allow an opportunity for you to comment on the proposed adjustment(s). Review the adjustments and contact me by phone or email within 14 calendar days of this date to discuss the specifics of any issue(s) you may have with the adjustment(s). After 14 days, the suspended claim will be released for processing.

If the adjustment can't be resolved at the staff level, you may dispute the proposed adjustment(s) at the next Board meeting. Should this be necessary, please notify me via email so that I may request to have this matter placed on the agenda of the meeting. Once the Board has made a determination, any dispute will be conducted according to Montana Code Annotated and compliant with the Montana Administrative Procedures Act.

Claim ID: 20251010A Release ID 4392 Ordinal: 14

Claim Amount: \$198,540.89 Reimbursement To-date: \$16,296.70

Adjustments:

<u>Action</u>	<u>Amount</u>	<u>Comment</u>
Reduced	\$5,216.05	Task 1 - Project Management activities are reduced to the allowed Project Manager labor rate. Project Management exceeds the established standards as set forth in ARM 17.58.341.
Reduced	\$68.46	Task 2 - Mobilization - Labor reduced to the allowed rate for the task, mileage rate reduced to allowed per mile vehicle rate.
Reduced	\$55,104.14	Task 3 - Soil Removal - Reduction to allowed reasonable rate per yard for 500 yards.
Denied	\$13,336.00	Task 4 - Water handling was not included in the work plan email, no Form 8 submitted for water handling, DEQ approval for the task. Costs disallowed.
Reduced	\$1,016.50	Task 5 - Fieldwork - Fieldwork oversight reduced to allowed level of professional (ARM 17.58.341).
Reduced	\$701.50	Task 5 - Fieldwork - fieldwork oversight reduced to labor necessary, excluding cost properly allocated to PM and water handling.
Reduced	\$2,288.00	Task 6 - Lab Analysis - Lab costs associated with tank installation samples. Not associated with contaminated soil removal work plan.



Petroleum Tank Release Compensation Board

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Reduced	\$1,231.20	Task 6 - Lab Analysis - Vendor invoices are not eligible for markup. Markup disallowed.
Reduced	\$416.00	Task 7 - DVSF - Claimed costs exceed reasonable cost for this task.
Reduced	\$1,552.50	Task 8 - Report preparation costs exceed the established standards as set forth in ARM 17.58.341.

Total Adjustment \$80,930.35

If you have any questions please contact me at (406) 444-9715 or via email aroot@mt.gov.

Sincerely,

Ann R Root
Fund Cost Specialist



Petroleum Tank Release Compensation Board

Initial Claim Review

Claim Ordinal: 14

Facility Name: **Zip Trip 39 formerly Noons 437**

Facility: **1503915**

City: **Kalispell**

County: **Flathead**

Claim ID: **20251010A**

Release ID: **4392**

Region: **1**

Date Claimed: **10/10/2025**

Eligible: **Eligible**

AO: **Autumn Desjarlais**

Amount: **\$198,540.89**

Reimbursed to date: **\$16,296.70**

PRS Mgr: ~~**Marcile Sigler**~~

Contact Company	Contact	Assent	LDR	POP
Water & Environmental Technologies Inc - Kali	Brad Bennett	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water & Environmental Technologies Inc - Butt	Raye Surratt	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water & Environmental Technologies Inc - Kali	Lisa Johnson	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

[See Invoice Summary](#)



Re-submission of withdrawn claim 20250902A.

Initial Review

Tech Review

REVIEWED

By Taylor Pirre at 9:43 am, Oct 31, 2025

REVIEWED

By Autumn Hidalgo at 3:22 pm, Jan 29, 2026

**MONTANA PETROLEUM TANK RELEASE COMPENSATION BOARD
CLAIM FOR REIMBURSEMENT –CORRECTIVE ACTION
FORM 3**

SEP 19 2025

20251010A

Claims should be submitted upon completion of a task or tasks of a Department approved corrective action plan for a **single** petroleum release. **A separate claim form is required for each release.** Please review the [Form 3 Instructions](#) before completing this form. If you require assistance, contact Board Staff at 406-444-9710.

If costs for PTRCB-eligible release investigation and cleanup activities, for which you are seeking reimbursement, have been paid by another funding source and you would like to allocate them towards the required PTRCB copay for this release, please review our Form 11 and its instructions, found on the [Forms page](#) of our website, BEFORE completing and submitting this claim Form 3.

1. Facility and Petroleum Release Information	
Name of Facility:	Zip Trip 39 formerly Noons 437
Street Address:	305 E Idaho St
City:	Kalispell, MT 59901
DEQ Facility Identification Number:	1503915 ✓
DEQ Petroleum Release Number: (only one release #)	4392 ✓

Petroleum Tank Release
Compensation Board
RECEIVED ON

OCT 10 2025

2. Owner – Name and Address		3. Operator – Name and Address		4. Payable to: – Name and Address (Required)	
CHS Inc - Spokane ✓		CHS Inc - Spokane		CHS Inc - Spokane p.o.p. ✓	
4407 N Division Suite #300 ✓		4407 N Division Suite #300		4407 N Division Suite #300	
Spokane, WA 9907 ✓		Spokane, WA 9907		Spokane, WA 9907	
Attn:	Jim Alford ✓	Attn:		Attn:	
Phone Number:	(509) 535-7701 ✓	Phone Number:		Phone Number:	
Fax Number:		Fax Number:		Fax Number:	
Email Address:	jim.alford@chsinc.com	Email Address:		Email Address:	
Do you want to receive Email about this claim?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Do you want to receive Email about this claim?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Do you want to receive Email about this claim?	Yes <input type="checkbox"/> No <input type="checkbox"/>

5. Claimant – Name and Address		6. Consultant – Name and Address		7. Any other person – Name and Address	
Water & Environmental Technologies		Water & Environmental Technologies		Water & Environmental Technologies	
102 Cooperative Way, #100		480 E Park Street		102 Cooperative Way, #100	
Kalispell, MT 59901		Butte, MT 59701		Kalispell, MT 59901	
Attn:	Brad Bennett	Attn:	Raye Surratt	Attn:	Lisa Johnson
Phone Number:		Phone Number:	(406) 782-5220	Phone Number:	(406) 309-6085
Fax Number:		Fax Number:		Fax Number:	
Email Address:		Email Address:	rsurratt@waterenvtech.com	Email Address:	ljohnson@waterenvtech.com
Do you want to receive Email about this claim?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Do you want to receive Email about this claim?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Do you want to receive Email about this claim?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

8. Total amount of this claim (including all page 2's): \$198,540.89 ✓

E-MAILED
10/24/2025

12. Owner Certification: I certify under penalty of perjury that this submitted claim is for work that was actually completed; that the work performed was necessary to clean up the petroleum release at the facility identified in **Section 1**; that the cost of work for which reimbursement is sought is reasonable; and that to the best of my knowledge, all information herein provided is true and correct. **NOTE: If someone is submitting the claim on behalf of the owner/operator, skip Section 12 and complete Section 13. See the [Form 3 instructions](#).**

Owner/Operator Signature _____

Date _____

Petroleum Tank Release
Compensation Board
RECEIVED ON

Typed Name of Owner/Operator _____

State of _____

OCT 10 2025

County of _____

Signed and Sworn before me on this day _____ by _____
Date Person who signed above

(SEAL)

Notary Public Signature _____

Printed or typed _____

Notary Public for the State of _____

Residing at _____

My Commission Expires _____

13. Claimant Certification: I certify under penalty of perjury that I am authorized to submit claims on behalf of the owner or operator for this release and the information on this claim form is true to the best of my knowledge. This claim is submitted for work that was actually completed.

Claimant Signature Brad Bennett

Date 10-6-2025

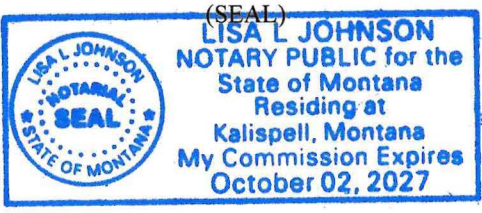
Typed Name of Claimant Brad Bennett

State of Montana

County of Flathead

Signed and Sworn before me on this day Oct 6, 2025 by Brad Bennett
Date Person who signed above

(SEAL)



Notary Public Signature Lisa L. Johnson

Printed or typed Lisa L. Johnson

Notary Public for the State of _____

Residing at Kalispell

My Commission Expires 10/02/2027

Submit this completed claim and supporting documents to the following address:
PETROLEUM TANK RELEASE COMPENSATION BOARD
PO BOX 200902, HELENA MT 59620-0902

This email string constitutes WPID (7168)35047 and the DEQ approval of that scope of work. No budget was provided and no obligation letter was produced for this scope of work.

Root, Ann

From: Herman, Christopher
Sent: Friday, May 16, 2025 2:14 PM
To: Desjarlais, Autumn
Cc: Root, Ann; Raye Surratt
Subject: RE: Facility ID 15-03915, Release 4392
Attachments: 4392_30Aug23_IARE_Excavation.pdf

Hello Autumn,

The WP ID for excavation at Zip Trip 39, FID 15-03915, Release 4392 is WPID 716835047. I am attaching the PDF of the conversation I had with Sarah Lupton (WET consultant) about the excavation and the amount of petroleum contaminated soil removed.

Regards,



Christopher Herman | *Petroleum Tank Cleanup*
Waste Management and Remediation Division
Montana Department of Environmental Quality
DESK: 406-444-6424 | Christopher.Herman@mt.gov
[Website](#) | [Facebook](#) | [Twitter](#) | [YouTube](#)
How did we do? Let us know here: [Feedback Survey](#)

From: Desjarlais, Autumn <ADesjarlais@mt.gov>
Sent: Tuesday, March 11, 2025 10:10 AM
To: Herman, Christopher <Christopher.Herman@mt.gov>
Cc: Root, Ann <aroot@mt.gov>; Raye Surratt <rsurratt@waterenvtech.com>
Subject: RE: Facility ID 15-03915, Release 4392

Chris,

Thank you for hand delivering that email from Sarah Lupton (WET) explaining the excavation. PTRCB can use the email for the basic work plan, but we will need a WPID assigned for the work that was approved in the email.

For the excavation, what criteria were used to identify the contaminated soils and how many cubic yards to remove? Were there PID results to determine the cubic yards of soil to remove? Were the soils removed due to contamination accounted for separately from the soils removed to access the tanks? PTRCB would reimburse for removal of contaminated soils but not soils removed solely to access the tanks.

Thank you,

Autumn Desjarlais
Fund Cost Specialist
Petroleum Tank Release Compensation Board

From: Desjarlais, Autumn
Sent: Thursday, March 6, 2025 1:57 PM
To: Raye Surratt <rsurratt@waterenvtech.com>
Cc: Root, Ann <aroot@mt.gov>; Herman, Christopher <Christopher.Herman@mt.gov>
Subject: RE: Facility ID 15-03915, Release 4392

Raye,

Sorry for the late response, I just got back from extended time off.

Thanks for providing that information. PTRCB reviewed the available information and reports. The original map in the *30-day report* dated 4/5/05 shows that BH-3 (tested “dirty”) is down gradient from the excavated area and release #4392, based on the groundwater flow description. It appears that the department reopened release #4392. You can send in the claims, but I will need the work plan and approval described below before those claims can be considered reimbursable.

Chris,

I took a look in TREADS and I did not see any work plans for excavation, or a work plan approval letter. Can you provide me with a soil removal work plan and the work plan approval letter for this excavation work that was done? Also, be sure to update TREADS and the directory with the material.

I look forward to hearing from you.

Thank you,

Autumn Desjarlais

Fund Cost Specialist
Petroleum Tank Release Compensation Board
Office | 406-444-9716
<https://deq.mt.gov/cleanupandrec/programs/ptrcb>

From: Raye Surratt <rsurratt@waterenvtech.com>
Sent: Wednesday, March 5, 2025 3:56 PM
To: Desjarlais, Autumn <ADesjarlais@mt.gov>
Cc: Root, Ann <aroot@mt.gov>
Subject: [EXTERNAL] RE: Facility ID 15-03915, Release 4392

Hello, I am checking back in on this as I have not received a response.

From: Raye Surratt
Sent: Thursday, February 20, 2025 4:51 PM
To: Desjarlais, Autumn <ADesjarlais@mt.gov>
Cc: Root, Ann <aroot@mt.gov>
Subject: RE: Facility ID 15-03915, Release 4392

We have samples collected from the old tank basin upon tank removal that demonstrate the removed tanks did not leak (T-1 through T-3) . When the contamination was encountered in the new tank basin on August 24, 2023, DEQ was notified. Samples were collected of the contaminated material (labeled SS-1, SS-2 and new tank hole). The removal of contaminated soil was approved in email by Christopher Herman on August 24, 2023 and excavation of contaminated soil took place starting on August 28. Based on results of the contaminated soil, release 4392 was re-opened. A table with analytical results is attached.

Thanks,
Raye

From: Desjarlais, Autumn <ADesjarlais@mt.gov>
Sent: Friday, February 14, 2025 2:41 PM
To: Raye Surratt <rsurratt@waterenvtech.com>
Cc: Root, Ann <aroot@mt.gov>
Subject: RE: Facility ID 15-03915, Release 4392

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Raye,

PTRCB has a standard business process that will require evidence to support that the found contamination during redevelopment belongs to release 4392, and not release 1327, or is not a new release because this contamination was found because of redevelopment activity and not a part of an investigation on site. Do you have any evidence you can provide?

It appears the department did not assign a workplan ID based on the information you provided in your email. To submit a claim on work that was done PTRCB would need the workplan ID and evidence to support that this found contamination is attributable to a specific release. It appears that we don't have the release number or the workplan ID. The normal process is PTRCB would first receive a workplan request letter from the department indicating that there is work that is required for that facility. Then, when the owner (or consultant on behalf of the owner) submits the workplan to the department then the workplan goes through a review process for all interested parties (including PTRCB) to comment on the workplan and provide feedback or concerns. This process did not happen.

Lastly, there would be an approval letter from the department that the work as described in the workplan was approved prior to the work being done. What evidence do you have that this work was approved prior to the work being done?

Thanks,

Autumn Desjarlais

Fund Cost Specialist
Petroleum Tank Release Compensation Board
Office | 406-444-9716
<https://deq.mt.gov/cleanupandrec/programs/ptrcb>

From: Raye Surratt <rsurratt@waterenvtech.com>
Sent: Wednesday, February 12, 2025 3:00 PM
To: Desjarlais, Autumn <ADesjarlais@mt.gov>
Subject: [EXTERNAL] RE: Facility ID 15-03915, Release 4392

Much appreciated, Autumn!

From: Desjarlais, Autumn <ADesjarlais@mt.gov>
Sent: Wednesday, February 12, 2025 1:26 PM
To: Raye Surratt <rsurratt@waterenvtech.com>
Subject: RE: Facility ID 15-03915, Release 4392

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Raye,

Thanks for checking in and I will be touching base with Terry this afternoon and hopefully have more information for you by Friday.

My apologies on the wait.

Autumn Desjarlais

Fund Cost Specialist
Petroleum Tank Release Compensation Board
Office | 406-444-9716
<https://deq.mt.gov/cleanupandrec/programs/ptrcb>

From: Raye Surratt <rsurratt@waterenvtech.com>
Sent: Wednesday, February 12, 2025 12:23 PM
To: Desjarlais, Autumn <ADesjarlais@mt.gov>
Subject: [EXTERNAL] RE: Facility ID 15-03915, Release 4392

Hey Autumn,

Just circling back on this. Can you provide me with some guidance so I can get a claim submitted please?

Thanks,

Raye

From: Desjarlais, Autumn <ADesjarlais@mt.gov>
Sent: Wednesday, January 15, 2025 3:35 PM
To: Raye Surratt <rsurratt@waterenvtech.com>
Subject: RE: Facility ID 15-03915, Release 4392

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Raye,

I will check on that and get back to you.

Thanks,

Autumn Desjarlais

Fund Cost Specialist

Petroleum Tank Release Compensation Board

Office | 406-444-9716

<https://deq.mt.gov/cleanupandrec/programs/ptrcb>

From: Raye Surratt <rsurratt@waterenvtech.com>

Sent: Tuesday, January 14, 2025 12:37 PM

To: Desjarlais, Autumn <ADesjarlais@mt.gov>

Cc: Root, Ann <aroot@mt.gov>

Subject: [EXTERNAL] Facility ID 15-03915, Release 4392

Hi Autumn,

See the attached email correspondence regarding excavation that took place in 2023 during site re-development. In cases like this, do we just need to submit the invoices for reimbursement, or is there a different process?

Thanks,

Raye



Raye A. Surratt, MS

Senior Engineer

C: (406) 431-2447

waterenvtech.com [waterenvtech.com]



From: [Sarah Lupton](#)
To: [Herman, Christopher](#)
Subject: [EXTERNAL] RE: Facility (15-03915) Zip Trip 39, Kalispell, Montana
Date: Wednesday, August 30, 2023 11:44:50 AM
Attachments: [image002.png](#)
[image003.png](#)

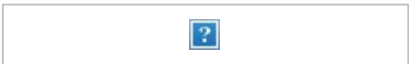
Chris,

Thank you for taking my call this morning and assisting with moving this project along. Just wanted to follow up from our conversation.

Excavation has been completed to the extent that was viable. The 400 cubic yards of contaminated soils have been taken offsite to a local gravel pit, placed on plastic sheeting, bermed and covered. Confirmation sampling was postponed today due to heavy rainfall leading to wet/slippery conditions on site. Sampling will begin tomorrow August 31st. According to our conversation, due to the size of the excavation we will be following DEQ sampling protocols with one change in order to reduce the amount of samples. We will only be collecting one grab sample and one composite sample per depth interval (0-8' and 8-16') per 25 ft length along the side wall, and one composite and one grab sample per 625 sq ft of floor. Lastly, because we have removed the allotted 400 sq ft and reached the extent we are capable of excavating on site due to constraints such as boundaries, buried lines and foundations, we have the go ahead to place the tanks and backfill once confirmation sampling has commenced.

Please let me know if I missed anything or if you have any questions or concerns.

Again, thank you for all your assistance with this dig out. It is very much appreciated.



Sarah Lupton

From: Herman, Christopher <Christopher.Herman@mt.gov>
Sent: Tuesday, August 29, 2023 11:46 AM
To: jim.alford@chsinc.com
Cc: randy.shervey@westmor-ind.com; Miner, Reed <RMiner@mt.gov>; Root, Ann <aroot@mt.gov>; Pankratz, Latysha <LPankratz@mt.gov>; mark.vigesaa@westmor-ind.com; Sarah Lupton <slupton@waterenvtech.com>
Subject: RE: Facility (15-03915) Zip Trip 39, Kalispell, Montana

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Dear Mr. Alford:

DEQ has talked with your consultant from WET on 8/29/2023 about the status of the excavation at 305 E Idaho Street (Fac. 15-03915) in Kalispell. Sarah Lupton with WET has confirmed that the excavation for the area to set the tanks and remove petroleum contaminated soil is done. To facilitate redevelopment and in consultation with your subcontractor DEQ is approving the following actions:

Over excavation of the petroleum contamination area has resulted in 400 cubic yards of petroleum contaminated soil, 100 more cubic yards than previously estimated. These 400 cubic yards of petroleum contaminated soil is to be disposed of at a licensed facility.

- It is DEQ's understanding that the contaminated soil is being placed on Visqueen and the top covered in plastic while being temporarily stored. As a reminder, it is DEQ's understanding that Flathead County Landfill does not accept petroleum contaminated soil after September 30. If that is the intended disposal facility, coordination will be necessary immediately upon receipt of soil analytical data.
- Excavation confirmation samples collected from the sidewalls and base of the excavation should be analyzed for VPH and EPH per the Montana Risk-Based Corrective Action Guidance for Petroleum Releases.

If you have any questions, please contact me at (406) 444-6424 or Christopher.herman@mt.gov

For your convenience, a list of consultants is attached.



Christopher Herman | *Petroleum Tank Cleanup*

Waste Management and Remediation Division
Montana Department of Environmental Quality

DESK: 406-444-6424 | Christopher.Herman@mt.gov

[Website](#) | [Facebook \[facebook.com\]](https://www.facebook.com) | [Twitter \[twitter.com\]](https://twitter.com) | [YouTube \[youtube.com\]](https://www.youtube.com)

How did we do? Let us know here: [Feedback Survey \[arcg.is\]](#)

From: Herman, Christopher ^{WPA date}

Sent: Thursday, August 24, 2023 3:14 PM

To: jim.alford@chsinc.com

Cc: randy.shervey@westmor-ind.com; mark.vigesaa@wesmore-ind.com; Miner, Reed <RMiner@mt.gov>; Root, Ann <aroot@mt.gov>; Pankratz, Latysha <LPankratz@mt.gov>

Subject: Facility (15-03915) Zip Trip 39, Kalispell, Montana

Dear Mr. Alford:

DEQ was notified on 08/24/2023 that petroleum contaminated soil was found at 305 E Idaho Street (Fac. 15-03915) in Kalispell. To facilitate redevelopment and in consultation with your subcontractor DEQ is approving the following actions:

- A consultant should be onsite during soil removal to screen and segregate petroleum contaminated soil.
- Based on the reported dimensions of the proposed UST basin, it is estimated that a total volume of 700 cubic yards of soil will be removed, of which up to 300 cubic yards may contain petroleum contamination. Petroleum contaminated soil is to be treated or disposed of at a licensed facility.
- If sample results and/or field screening results suggest that additional excavation beyond the proposed UST basin, your consultant is to consult with DEQ. Please have your consultant submit to DEQ prior to excavation the proposed field screening method and decision criteria for determining if the excavation is to be expanded.
- The extent of the remedial excavation should be determined in consultation with DEQ and based on the data gathered by soil samples taken at the floor, sidewalls of the excavation area and a PID

screening of the soil. Limit the extent of the excavation both laterally and vertically to that necessary to achieve remediation goals.

- If petroleum contaminated soil cannot be directly hauled to the landfill, have your consultant communicate to DEQ their plan to ensure stockpiled soil with petroleum contamination does not cause a leaching or direct-contact risk to human health or the environment.
- Collect soil samples from the base and sidewalls of the excavation to assess the extent and magnitude of residual petroleum contamination and to assess risk to human health.
- Discuss ongoing tasks and results with DEQ's project manager.
- Following completion of field work, a Cleanup Report will need to be submitted that includes a description of the volume of soil removed, the method used for disposal, a description of the sample locations (laterally and vertically), tabulated analytical data, etc.

The Petroleum Tank Release Compensation Board (PTRCB) will require a budget if you intend to seek reimbursement of remediation of petroleum contaminated soil. If a budget is submitted to PTRCB, they will review the costs associated with this excavation and provide comments under separate correspondence. DEQ's approval above does not guarantee PTRCB will allow funding for or reimburse you for costs incurred for completing the approved actions above. If you have any questions regarding reimbursement, please contact PTRCB at (406) 444-9710 or (800)556-5291.

If you have any questions, please contact me at (406) 444-6424 or Christopher.herman@mt.gov

For your convenience, a list of consultants is attached.



Christopher Herman | *Petroleum Tank Cleanup*
Waste Management and Remediation Division
Montana Department of Environmental Quality

DESK: 406-444-6424 | Christopher.Herman@mt.gov

[Website](#) | [Facebook \[facebook.com\]](https://www.facebook.com) | [Twitter \[twitter.com\]](https://twitter.com) | [YouTube \[youtube.com\]](https://www.youtube.com)

How did we do? Let us know here: [Feedback Survey \[arcg.is\]](#)

Pirre, Garnet

From: Pirre, Garnet
Sent: Friday, May 30, 2025 11:53 AM
To: Lisa Johnson; Pirre, Taylor
Cc: Root, Ann; Wadsworth, Terry; Desjarlais, Autumn
Subject: RE: Zip Trip Claim for WP 35407
Attachments: 716835047_4392rel_WP_WPA_30Aug23_IARE_Excavation_email.pdf; Claim Packet Zip Trip Excavation WP 35047.pdf

Importance: High

Tracking:	Recipient	Read
	Lisa Johnson	
	Pirre, Taylor	Read: 5/30/2025 11:54 AM
	Root, Ann	
	Wadsworth, Terry	
	Desjarlais, Autumn	

Dear Lisa,

Thanks for sending this our way before submittal. I appreciate you giving us the opportunity to engage before you submit this. We can have time and conversation to make it as complete as possible. I am attaching the claim packet to this response, so that those I have looped in have a complete picture of the costs that are being associated with WP 7168350477 are turning out to be.

It appears, from the subject line of this email that the claim is being submitted for work done on WP 716835407, which was for excavation work but was not processed in the normal course of work plan submittal, review, and approval.

This conversation started back in 2023 with DEQ and from the email thread I am looking at, we were told in 2023 that there was additional soil excavation to be done, we got a WP ID for it May 16, 2025 but we had no idea that the costs were going to be that of a normal work plan without the process used for work plans outlined in law.

Are the costs contained in this claim only for soils that were removed only for remediation purposes, not to get to the tanks?

The accumulation of costs over the past two years, without submitting a claim, leaves PTRCB in the position of having to do all the cost control and assessment of actual, reasonable, and necessary costs at the claim level. We were not provided with a budget, scope, or conversation prior to this.

Please see the email thread attached that outlines what happened, what we thought we understood, and the timing of this.

I think it would be helpful to touch base with Raye and ask for a delineation of the soil removal costs as outlined in the attached email, so we don't have to take it apart at the claim level for appropriate scope of work.

Thanks So Much,

Garnet

From: Lisa Johnson <ljohnson@waterenvtech.com>
Sent: Friday, May 30, 2025 10:52 AM
To: Pirre, Garnet <GPirre@mt.gov>; Pirre, Taylor <Taylor.Pirre@mt.gov>
Subject: [EXTERNAL] Zip Trip Claim for WP 35407

Hi Garnet / Taylor,

I have a claim to submit and wanted to get your input before mailing. Mostly because we have 3 different entities that paid each other and there are a lot of Form 6's.



Lisa Johnson

Administrative Assistant

P: (406) 309-6085

C: (661) 406-4626

waterenvtech.com [waterenvtech.com]



Submitted by CHS for Claim 20251010A Adjustment Dispute



Cenex Zip Trip
4407 N Division St Sulte 300
Spokane, WA 99207
(509) 535-7701

May 29, 2026

Hand Delivered & E-mail

Petroleum Tank Release Compensation Board
Executive Director
PO Box 200902; 2401 Colonial Drive
Helena, MT 59620-0902
PTRCB@MT.GOV

Re: Claim 20251010A. Cenex Zip Trip #39, 305 E. Idaho St., Kalispell, MT
Reimbursement from the Petroleum Tank Release Cleanup Fund.
DEQ Facility Id: 1503915. DEQ Petroleum Release: 4392.

Dear Sir:

Regarding the above-named facility and release, Cenex Zip Trip respectfully requests the opportunity to be heard in response to the staff's March 10, 2026 recommended \$80,930.35 decrease for Claim 20251010A. Our claim, submitted Oct. 10, 2025, is for \$198,540.89.


Generally, we think the staff did not understand the work required, and if they had understood, our claim would not have been reduced. Below is a highlight of the key facts that I will be prepared to explain in more detail at the June 22, 2026 Board meeting, as needed:

- DEQ required contaminated soil to be removed from Zip Trip #39 in Kalispell.
- Chris Herman of DEQ approved Cenex Zip Trip's plan to excavate the contaminated soil, requiring it to be treated or disposed at a licensed facility. He also recognized in his 8/24/2023 approval that the petroleum contaminated soil may not be able to be directly hauled to the landfill and may need to be stockpiled.
- Cenex Zip Trip's consultant determined that the contaminated soil could not be directly hauled to the landfill because it was wet or soupy. This is recorded in the 8/30/2024 field log, which notes that the soil was saturated. The mixture was excavated out by Matson Trucking, placed on a liner as required by DEQ, and about a month later after the material had sufficiently aired out, Matson trucked it to the landfill. These two Matson invoices, submitted with our claim, totaled \$146,859.05.
- On March 10, 2026 the staff recommended a decrease to \$91,754.91 and we don't understand why. It looks like staff is only recommending payment of one of the
- Matson invoices. On April 20 and April 28, Cenex Zip Trip's consultant wrote to the PTRCB staff asking how the recommended decrease was determined and our inquiry was neither acknowledged nor responded to.

- A third invoice from Westmor for \$11,250 was recommended as denied, and the explanation given was that the cost was disallowed because, “water handling was not included in the work plan email...” The invoice noted that it was for labor related to soil contamination. Pumping water was listed on the invoice but as explained above the soil was saturated. Water was mixed in with the soil, so in order to remove the contaminated soil, some amount of a watery mix, with a trash pump had to be addressed. I think if the staff had known this was the situation, the Westmor invoice would not have been denied.
- A reduction of \$5,216.05 was also recommended for Project Management, although Cenex submitted the invoices. Staff should have asked for further information as outlined in ARM 17.58.341(4). Staff did not respond to Cenex’s inquiries sent on April 20 and 28, 2026.

For the Board’s convenience, I have enclosed nine copies of this submittal for your distribution. In addition to the January 16, 2025 Abbreviated Contaminated Soil Excavation and Disposal Report with selected appendices submitted to DEQ, enclosed are the three invoices identified above and a photo of the excavation. The Report includes correspondence with DEQ and the field log. If there is a need for DEQ personnel to appear in person on June 22, 2026 to verify the above, please advise and Cenex will make that request. Thank you.

Sincerely,



Jim Alford

Enclosures: Jan. 16, 2025 Report to DEQ; Matson Invoices dated Aug. 31, 2023, Sept. 27, 2023; Westmor Invoice dated 11/17/2023; photo.



Abbreviated Contaminated Soil Excavation and Disposal Report: Zip Trip #39, Facility ID 15-03915, Release 4392

Kalispell, Montana



Prepared For:
**Montana Department of
Environmental Quality**

Site Owner:
Zip Trip #39
305 East Idaho Street
Kalispell, MT 59901

January 16, 2025
39

1 EXECUTIVE SUMMARY

Zip Trip #39 (Facility) located at 305 East Idaho Street in Kalispell, MT is currently a retail fueling station and convenience store that began re-development activities in 2023 which included closing and removing tanks located on the western portion of the site and installing new tanks on the eastern portion of the site. While installing new tanks in the eastern portion of the Facility, contaminated soil was discovered in the new tank basin. Evidence of contamination was not present in the western tank basin; soil samples were collected on August 22, 2023 prior to backfilling. Analytical results demonstrated that no detectable concentrations of petroleum analytes were present. The Department of Environmental Quality (DEQ) was notified of the presence of contamination on August 24, 2023. Christopher Herman, DEQ, provided approval of the excavation of contaminated soils in an email on August 24, 2023. Approximately 400 cubic yards of contaminated soil were removed from the area shown on **Figure 1**. Following the excavation of the petroleum contaminated soil and collection of confirmation samples, the new tanks were installed and the excavation was backfilled. The Underground Storage Tank Permit is provided as **Appendix A**.

2 FACILITY BACKGROUND

The Facility is located at 305 East Idaho Street in Kalispell, Montana and is currently a retail fueling station and convenience store. The Facility has previously operated as a Noon's #437 and a Cenex Kum-N-Go; both of which consisted of a retail fueling station and convenience store. Release #4392 was discovered in 2005 during a Phase II Environmental Site Assessment conducted by Maxim Consulting. Soil and groundwater were determined to be impacted by petroleum hydrocarbons. A remedial investigation (RI) conducted by Higgins Consulting Engineers in 2005/2006 revealed that impacts resulting from the Facility release were limited; however, impacts were present in the southeastern portion of the Facility that were presumed to be a result of the release on the neighboring property to the east (Laplume Exxon, Facility ID 15-05489, Release 1327). No information was available for work conducted between the 2005/2006 RI and 2009, when a "No Further Action" letter was issued for Release 4392.

3 PURPOSE AND OBJECTIVES OF CLEANUP

The objective of the excavation was to remove petroleum-impacted soils in the eastern portion of the Facility so re-development of the area could continue and installation of new tanks could take place.

4 CONTAMINATED SOIL EXCAVATION

Prior to the commencement of excavation activities, utility locates were performed using Montana's One Call System (811) to ensure re-development activities could be completed safely. No utilities were present in the excavation area. A stormwater line was found to the south and north of the site. A sewer line was found to the east of the site.

4.1 CONTAMINATED SOIL EXCAVATION

Westmor Industries completed excavation, tank removal, and tank installation activities. During excavation of the new tank basin on the east portion of the Facility, petroleum impacted soil was present. Westmor personnel collected seven samples (SS-1, SS-2, New Tank Hole Bottom 11', New Tank Hole E Side Wall 10.5', New Tank Hole W Side Wall 10.5', New Tank Hole S Side Wall 10.5', New Tank Hole N Side Wall 10.5') on August 24, 2023 to confirm the release. These samples were analyzed for volatile petroleum hydrocarbons (VPH) and extractable petroleum hydrocarbons (EPH). Additionally, two of the seven samples were analyzed for polycyclic aromatic hydrocarbons (PAHs). VPH and EPH results are presented in **Table 1**, PAH results are presented in **Table 2**. The Department of Environmental Quality (DEQ) was notified of the

presence of contamination on August 24, 2023. Christopher Herman, DEQ, provided approval of the excavation of contaminated soil in an email on August 24, 2023. This email communication is provided as **Appendix B**.

WET personnel oversaw the excavation of petroleum contaminated soil from the eastern tank basin from August 28th through August 30th, 2023. Initial volume calculations showed that a total of 700 cubic yards were to be removed, 300 of which was estimated to have petroleum contamination. On August 29th, 2023, a request was made to DEQ stating the need for additional excavation due to more petroleum contaminated soil than anticipated. DEQ approved the excavation and disposal of an additional 100 cubic yards of contaminated soil.

Field notes were recorded as outlined in WET Standard Operating Procedure (SOP)-1: Field Logbook and Field Sampling Forms (**Appendix C**) and are provided as **Appendix D**. Soil was screened with a photoionization detector (PID) for volatile organic compounds (VOCs) via the heated headspace method in accordance with WET standard operating procedure (SOP)-12: Procedures for Field Screening Using a Photoionization Detector (**Appendix C**). Soil exhibiting PID measurements of less than 100 parts per million (ppm) was segregated from the contaminated material, stockpiled, and used as backfill. Soil with PID measurements greater than 100 ppm was excavated and disposed of. The excavation measured approximately 55 feet (ft) long by 50 ft wide and 16 ft deep. An estimated 400 cubic yards of contaminated soil was removed for disposal. Excavation was limited to the east by a buried sewer line and foundations in the area. Disposal of contaminated soil is discussed further in Section 4.5.

4.2 CONFIRMATION SAMPLING

Following the excavation, soil samples were collected from the walls and floor of the site in accordance with DEQ's Soil Sampling Guidance (2015) and WET SOP-9B: Soil, Sediment and Rock Sampling (**Appendix C**). One grab sample and one composite sample were collected per depth interval (0-8' and 8-16') per 25 ft of length along the side wall of the excavation. Floor samples were collected at a frequency of one grab and one composite sample per 625 square feet of floor, for a total of four grab samples and four composite samples. Sample locations are depicted in **Figure 2**. Samples were identified as either side wall (SW) or floor (F) using the order in which they were collected, whether they were grab or composite (G for grab sample and C for composite sample) and the depth interval. For example, the first composite sample from the side wall from 0 to 8 feet was identified as "SW-1C [0-8]".

4.3 LABORATORY ANALYSIS

Following sample collection, soil samples were submitted for laboratory analysis following the procedures outlined in WET SOP-4: Sample Nomenclature, Documentation, and Chain of Custody and WET SOP-3: Sample Package and Shipping (**Appendix C**). Composite and grab samples were analyzed for volatile petroleum hydrocarbons (VPHs) and extractable petroleum hydrocarbons (EPHs). The laboratory analytical reports are included as **Appendix E**.

4.4 QUALITY ASSURANCE/QUALITY CONTROL

Quality assurance/quality control (QA/QC) samples were not collected. Out of 680 total data points, 658 remain unqualified (96.8%) and are considered quantitative. The remaining 22 data points (3.2%) were qualified as estimated due to lack of field duplicate and trip blank, detections below the reporting limit, and poor laboratory recovery. Data validation summaries are included report as **Appendix E**.

4.5 INVESTIGATION DERIVED WASTE (IDW) MANAGEMENT, CHARACTERIZATION, AND DISPOSAL

Soil and non-indigenous IDW was generated during the excavation. Soil IDW was temporarily stockpiled on Visqueen and the top covered with plastic while waiting for landfill approval. Soil IDW was sampled and characterized in accordance with acceptance criteria for the Flathead County Solid Waste District in Kalispell, MT. Following landfill approval, the soil was disposed of at the Flathead County Landfill. Sample characterization, landfill approval, and waste manifests are included as **Appendix F**.

Non-indigenous IDW such as disposable sampling scoops, nitrile gloves, and disposable plastic bags were bagged and placed in a trash receptacle for landfill disposal.

5 RESULTS

Excavation sample results for VPH and EPH are provided in **Table 1**. The laboratory analytical reports and corresponding data validation summaries are provided as **Appendix E**.

Samples SS-2, New Tank Hole Bottom 11', and New Tank Hole W Sidewall 10.5' (collected prior to the excavation of contaminated material) exhibited concentrations of one or more analytes (benzene, C9 to C10 aromatics, and/or C5 to C8 aliphatics) above their respective risk-based corrective action (RBCA) levels for leaching to groundwater (<10 feet to groundwater). Following contaminated material sample collection, the areas these samples were collected from were further excavated to remove the contaminated material.

Upon completion of excavation of contaminated material, confirmation samples were collected from the floor and sidewalls of the excavation. Benzene was not detected in any of the confirmation samples. C9 to C10 aromatics, C5 to C8 Aliphatics and C9 to C12 Aliphatics were detected in several confirmation samples; all reported concentrations of these analytes were below all applicable screening levels. Concentrations of C9 to C10 aromatics, C5 to C8 Aliphatics and C9 to C12 Aliphatics in confirmation samples are displayed on **Figure 2**.

EPH screen concentrations in all confirmation samples were below 200 mg/kg. The highest detection was 191 mg/kg in the 0 to 8 ft depth interval on the eastern wall. Further excavation was not possible due to the sewer line along the eastern property border.

6 RECOMMENDATIONS

Analytical results from confirmation samples collected from the floor and sidewalls of the excavation indicate petroleum contaminated soil was effectively removed from the intended tank basin area. WET recommends proceeding with plans to conduct an RI as approved by DEQ in a Work Plan Approval letter dated October 11, 2024. The RI activities will fully investigate the Release and ensure that all potential exposure pathways have been evaluated.

Appendix B

DEQ Email Correspondence: Excavation Report

From: [Sarah Lupton](#)
To: [Raye Surratt](#)
Subject: FW: Facility (15-03915) Zip Trip 39, Kalispell, Montana
Date: Tuesday, January 16, 2024 2:25:00 PM
Attachments: [image002.png](#)
[image003.png](#)

Below is the email chain concerning the sampling and backfilling plan at Zip Trip.

Cheers,


Sarah Lupton

From: Sarah Lupton
Sent: Wednesday, August 30, 2023 2:55 PM
To: Brad Bennett <bbennett@waterenvtech.com>
Subject: FW: Facility (15-03915) Zip Trip 39, Kalispell, Montana

FYI. Sent to Chris the morning.


Sarah Lupton

From: Sarah Lupton
Sent: Wednesday, August 30, 2023 11:45 AM
To: Herman, Christopher <Christopher.Herman@mt.gov>
Subject: RE: Facility (15-03915) Zip Trip 39, Kalispell, Montana

Chris,

Thank you for taking my call this morning and assisting with moving this project along. Just wanted to follow up from our conversation.

Excavation has been completed to the extent that was viable. The 400 cubic yards of contaminated soils have been taken offsite to a local gravel pit, placed on plastic sheeting, bermed and covered. Confirmation sampling was postponed today due to heavy rainfall leading to wet/slippery conditions on site. Sampling will begin tomorrow August 31st. According to our conversation, due to the size of the excavation we will be following DEQ sampling protocols with one change in order to reduce the amount of samples. We will only be collecting one grab sample and one composite sample per depth interval (0-8' and 8-16') per 25 ft length along the side wall, and one composite and one grab sample per 625 sq ft of floor. Lastly, because we have removed the allotted 400 sq ft and reached the extent we are capable of excavating on site due to constraints such as boundaries, buried lines and foundations, we have the go ahead to place the tanks and backfill once confirmation sampling has commenced.

Please let me know if I missed anything or if you have any questions or concerns.

Again, thank you for all your assistance with this dig out. It is very much appreciated.

From: Herman, Christopher <Christopher.Herman@mt.gov>
Sent: Tuesday, August 29, 2023 11:46 AM
To: jim.alford@chsinc.com
Cc: randy.shervey@westmor-ind.com; Miner, Reed <RMiner@mt.gov>; Root, Ann <aroot@mt.gov>; Pankratz, Latysha <LPankratz@mt.gov>; mark.vigesaa@westmor-ind.com; Sarah Lupton <slupton@waterenvtech.com>
Subject: RE: Facility (15-03915) Zip Trip 39, Kalispell, Montana

WARNING - This email originated from an EXTERNAL SOURCE. Do not reply, click any link or open attachments unless you can confirm the sender. *Please report suspicious emails to itsupport*

Dear Mr. Alford:

DEQ has talked with your consultant from WET on 8/29/2023 about the status of the excavation at 305 E Idaho Street (Fac. 15-03915) in Kalispell. Sarah Lupton with WET has confirmed that the excavation for the area to set the tanks and remove petroleum contaminated soil is done. To facilitate redevelopment and in consultation with your subcontractor DEQ is approving the following actions:

- Over excavation of the petroleum contamination area has resulted in 400 cubic yards of petroleum contaminated soil, 100 more cubic yards than previously estimated. These 400 cubic yards of petroleum contaminated soil is to be disposed of at a licensed facility.
- It is DEQ's understanding that the contaminated soil is being placed on Visqueen and the top covered in plastic while being temporarily stored. As a reminder, it is DEQ's understanding that Flathead County Landfill does not accept petroleum contaminated soil after September 30. If that is the intended disposal facility, coordination will be necessary immediately upon receipt of soil analytical data.
- Excavation confirmation samples collected from the sidewalls and base of the excavation should be analyzed for VPH and EPH per the Montana Risk-Based Corrective Action Guidance for Petroleum Releases.

If you have any questions, please contact me at (406) 444-6424 or Christopher.herman@mt.gov

For your convenience, a list of consultants is attached.



Christopher Herman | *Petroleum Tank Cleanup*
Waste Management and Remediation Division
Montana Department of Environmental Quality
DESK: 406-444-6424 | Christopher.Herman@mt.gov
[Website](#) | [Facebook](#) | [Twitter](#) | [YouTube](#)
How did we do? Let us know here: [Feedback Survey](#)

From: Herman, Christopher

Sent: Thursday, August 24, 2023 3:14 PM

To: jim.alford@chsinc.com

Cc: randy.shervey@westmor-ind.com; mark.vigesaa@wesmore-ind.com; Miner, Reed <RMiner@mt.gov>; Root, Ann <aroot@mt.gov>; Pankratz, Latysha <LPankratz@mt.gov>

Subject: Facility (15-03915) Zip Trip 39, Kalispell, Montana

Dear Mr. Alford:

DEQ was notified on 08/24/2023 that petroleum contaminated soil was found at 305 E Idaho Street (Fac. 15-03915) in Kalispell. To facilitate redevelopment and in consultation with your subcontractor DEQ is approving the following actions:

- A consultant should be onsite during soil removal to screen and segregate petroleum contaminated soil.
- Based on the reported dimensions of the proposed UST basin, it is estimated that a total volume of 700 cubic yards of soil will be removed, of which up to 300 cubic yards may contain petroleum contamination. Petroleum contaminated soil is to be treated or disposed of at a licensed facility.
- If sample results and/or field screening results suggest that additional excavation beyond the proposed UST basin, your consultant is to consult with DEQ. Please have your consultant submit to DEQ prior to excavation the proposed field screening method and decision criteria for determining if the excavation is to be expanded.
- The extent of the remedial excavation should be determined in consultation with DEQ and based on the data gathered by soil samples taken at the floor, sidewalls of the excavation area and a PID screening of the soil. Limit the extent of the excavation both laterally and vertically to that necessary to achieve remediation goals.
- If petroleum contaminated soil cannot be directly hauled to the landfill, have your consultant communicate to DEQ their plan to ensure stockpiled soil with petroleum contamination does not cause a leaching or direct-contact risk to human health or the environment.
- Collect soil samples from the base and sidewalls of the excavation to assess the extent and magnitude of residual petroleum contamination and to assess risk to human health.
- Discuss ongoing tasks and results with DEQ's project manager.
- Following completion of field work, a Cleanup Report will need to be submitted that includes a description of the volume of soil removed, the method used for disposal, a description of the sample locations (laterally and vertically), tabulated analytical data, etc.

The Petroleum Tank Release Compensation Board (PTRCB) will require a budget if you intend to seek reimbursement of remediation of petroleum contaminated soil. If a budget is submitted to PTRCB, they will review the costs associated with this excavation and provide comments under separate correspondence. DEQ's approval above does not guarantee PTRCB will allow funding for or reimburse you for costs incurred for completing the approved actions above. If you have any questions regarding reimbursement, please contact PTRCB at (406) 444-9710 or (800)556-5291.

If you have any questions, please contact me at (406) 444-6424 or Christopher.herman@mt.gov

For your convenience, a list of consultants is attached.

Christopher Herman | *Petroleum Tank Cleanup*
Waste Management and Remediation Division

Appendix D

Field Notes

Cenex Zip Trip - E Idaho St
8-24-23

67

West: PID = 195 ppm
SWest: PID = 258 ppm Loose mate
North: PID = 7 ppm @ visual
South 1: PID = 3 ppm @ visual
East: PID = 1 ppm @ visual

Water sample from west wall
seep. Water could be mainly
rain w/ some seepage

@ 10-11 ft hit clay bottom
contaminated in evident w/ color &
smell. Area of contamination appears
to be in fill (sandy material)
excavation moving west
26w x 40L x 15d

Soil Samples taken from
West & SWest PID locations
GW-1 @ 1500
SS-1 @ 1530
SS-2 @ 1535

Samples shipped & rush added
via Dasey on 8-25-23

8-28-823

LHC - taking contaminated soil

Found more smelly soils on northeast corner on Fri/Sat

Going to clean up hole + then do investigating excavation to the north

Getting pump to contain water infiltrating in excavation water will be contained in water tank

Contamination appears to go west + south w/ some more to north. Appears to be in sand layer about 1-2ft thick above clay.

Northeast corner dig to depth smelly register 102 ppm. Slick starting to show on water

Dig to 5' north of northeast corner. Looking for extent

12' deep hit 75 ppm

Contaminated area appears to be a small vein of sandy-er

8-28-23

looser material, dig out extent. No more smell from pit (test)

visually black about 8 inch diameter

Dig second test pit on south to 10-12ft. some smell in

clayey loose layer. PPM = 25 ppm

1015 City inspectors onsite

1030 moving trucks begin

excavating, about 18' reading PID = 52 ppm

1040 \approx 10' pid 150 ppm

1050 \approx 11.5-12' Right side (east)

PID = 220 ppm

1055 \approx 15' PID = 10 ppm

Dark grey layer on bottom seems to be extent

1100 Spoke to C. Herman w/

DEQ about extent of excavation

He said to excavate as far as physically possible. for safety, equipment and property boundary.

1115 called test pit good for 2' + southern extent

1120 loading contaminated material from inside pit

70 8-28-23

1150 South + Southwest side
of pit \approx 9-10' PID = 172 ppm
very black sand above clay
layer

1200 Continue excavation to 15'
and to the South 25' from
property boundary.

1215 off site

1230 onsite

\approx 10' deep south extent
possible ~~at~~ tank placement
of tanks, sandy gravel w/
wet selen. PID = >1000 ppm

1245 10' south of original border
in line w/ fence \approx 8-9'
pid = 450 ppm

1300 10' south original perimeter
10' deep PID = >1000 ppm

Bob (Robert) Pederson
1-320-780-6505

Smells like & appears to be
gasoline release to the south

1330 Sample gasoline release area
SS-3 @ 1330

1350 moving to North W edge

Scale: 1 square =

71

Will be laying back $>5'$ into
original design to north & to
15' depth grade. Testing along
way.

1405 Digging on northeast corner
& side

1410 Central pit PID 200 @ 8'
& 185 ppm (slightly south)

1415 Truckloads = 5

1445 South edge of excavation
10' down PID = 863

1515 Discussion w/ Chris w/ DEQ
Pet board approval is for 300 cy
of contaminated soil. Do not go
over 300 cy without permission.

Should be good @ 100 cy as of
1500 8-28-23.

1520 Working on excavating north
edge

26' x 39' @ bottom of hole

1545 @ 152 cy

1550 South sidewall sand PID = 5

1555 South dig @ 11-12 128 ppm

1600 South dig @ 15' 48 ppm

1615 ~~So.~~ North side \approx 15'
PID = 68 ppm

50

Scale: 1 square =

8-28-23

1630 mid pit 13'-14' PID=1

1645 Northeast corner 12-13'

PID 350 ppm

1650 NE corner 15' PID=28 ppm

1700 OFF site

1720 Unpack Truck

1730 Done for Day

8-28-23

8-29-23

0715 Arrive onsite

0630 Check in w/ Mark

0645 Discuss w/ Mark

0730 Filling first truck. PID=211 ppm

0735 Filling 2nd truck PID 105 ppm

* 6 more truck loads until
> 300 cyu

Bob from Westmoore is calling

0755 Eastside Floor @ 15' PID=108

17 ppm. Call depth good continue
excavating center of pit. Material
from 10-15'

0815 Truck 3 fill PID=184 ppm

0820 Truck 4 fill PID=217 ppm

0825 Truck 5 fill PID=127 ppm

0830 Truck fill #6 PID=166 ppm

Judy 406-261-2494

0900 Spoke w/ Scott M to talk
to Judy. Spoke w/ Judy about
piles @ their pit. She wants them
screened & tested. The ones that
stay. Spoke to Bob w/ Westmoore
we are good to continue to 500 cyu
His company is writing the letter
to DEQ stating the need for additional
excavation.

~~8-28-23~~ 8-29-23

0905 Filling truck PID = 181 ppm

0920 Filling clean truck PID = 8 ppm

Discussion to utilize 1-2 of the trucks to grab the contaminated soil from Matteson this afternoon.

0945 Talk w/ Branin stuff @ Matteson got mixed up so will not be able to move today w/o separating. Looking for more plastic. Will start sloping & doing final cut to south edge. Clean truck being filled.

1010 PID mid pit = 0 ppm

1015 PID mid pit = 192 ppm

1040 Spoke w/ Chris H. Petro

has not approved extra 200 cy

he is making calls because the extra is already in loose material so has to be excavated. Explained

the dimensions of the digout w/ depth of contaminated layer.

He will be calling back soon with further instruction. Vents @ vents is the question.

1050 Truck load PID = 0 ppm

1055 Truck load PID = 234 ppm

1105 Measured Pit 55' x 50' Area =

Scale: 1 square =

8-29-23

Contaminated Zone 8-11' to 13-15'

1135 mid pit PID = 0 @ 15'

1140 mid pit PID = 147 @ 13-12'

1145 Truck Fill PID = 237 ppm

1200 Call from C. Herman about approval. Approved for 100 more cubic yards of contaminated material disposal. Wants a summary email w/ pictures

Thursday or Friday.

1205 Filling truck w/ 130 ppm soil

1215 confirmed covering of stockpile & handle stormwater & grade. Discuss movement forward w/ Scott

1220 Fill Truck to LHC PID = 128 ppm

1240 Fill Truck to LHC PID = 84 ppm

1300 Excavating last corner of original footprint. SE corner

1325 Filling clean truck

1330 Filling clean truck

1440 Mark w/ Hammerquist

check in. Question about waiting to place tanks before results. Will ask Chris tomorrow.

Start sampling tomorrow morning

Scale: 1 square =

8-29-23

1500 fill truck PID = 157 ppm

1505 check SF corner bucket

0 ppm

1510 move to west side to

finish loose dirt

1515 need to lay back to 1:1 for

OSHA safety

1530 working on laying back

NW & west edges

1700 offsite for day

8-30-23

0 830 Site too saturated
to sample. Plan to pump
out tomorrow and sample
tuesday

0 Sample LHC stockpile
for FCSWD sample

Ship samples

Check on pump progress.

Notable to get truck

close enough to wall

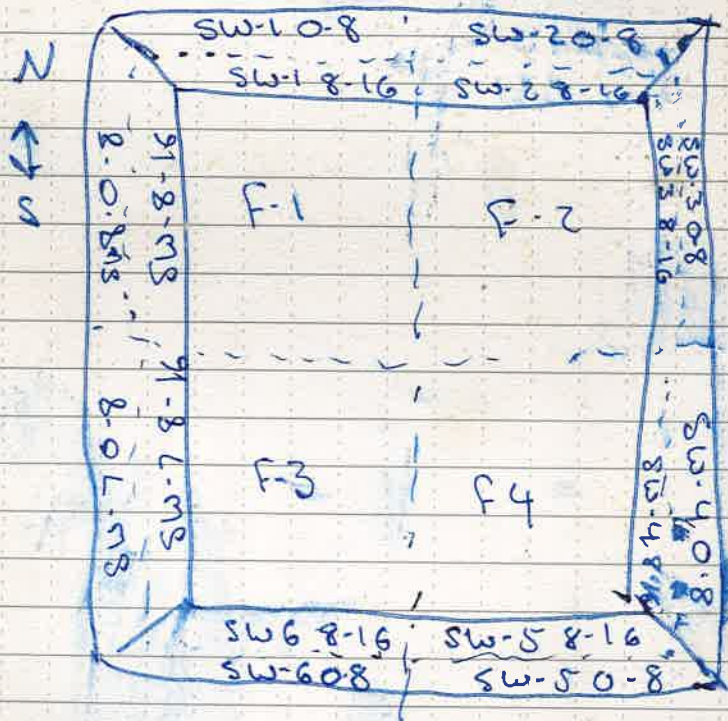
Pulling back walls.

Done for day onsite.

~~09~~ 9-8-23

1100 Arrive onsite. Pump working after switching ~~trous~~ hoses and to water truck pump. Containing water in water truck.

1140 Set up to sample upper samples while pumping out pit.



Scale: 1 square = _____

9-8-23

Fr SL 39 Zip Trip

~~SW-10-8~~

Sample	Time	PID
SW-10-8C	1300	0.0
SW-18-16C	1310	12.135.8 ^{SL}
SW-20-8 SW-10-8G	1305	0.0
SW-18-16G	1315	10.939.2 ^{SL}
SW-20-8C	1320	0.0
SW-20-8G	1325	0.0
SW-28-16C	1330	28.9
SW-28-16G	1335	26.6
SW-30-8C	1340	0.0
SW-30-8G	1345	0.0
SW-38-16C	1350	45.3
SW-38-16G	1355	40.1
SW-40-8C	1400	0.0
SW-40-8G	1405	0.0
SW-48-16C	1410	41.8
SW-48-16G	1415	44.9
SW-50-8C	1420	0.0
SW-50-8G	1425	0.0
SW-58-16C	1430	36.3
SW-58-16G	1435	37.8
SW-60-8C	1440	0.0
SW-60-8G	1445	0.0
SW-68-16C	1450	40.2
SW-68-16G	1455	40.5

Scale: 1 square = _____

9-8-23

39 Zip Trip

Sample	Time	PID
SW-7 0-8C	1500	0.0
SW-7 0-8G	1505	0.0
SW-7 8-16C	1510	33.4
SW-7 8-16G	1515	32.9
SW-8 0-8C	1520	0.0
SW-8 0-8G	1525	0.0
SW-8 8-16C	1530	28.8
SW-8 8-16G	1535	23.1
F-1C	1540	12.8
F-1G	1545	13.1
F-2C	1550	20.6
F-2G	1555	20.3
F-3C	1600	25.2
F-3G	1605	25.5
F-4C	1610	23.7
F-4G	1615	23.5

1630 begin filling w/ gravel

~~pack up samples~~ SL

~~1700 drop off @ Fedex UPS 9-8-23~~

missed drop off time

Scale: 1 square = _____

Matson Trucking & Excavating
288 Half Moon Road
Columbia Falls, MT 59912

Invoice

Invoice Number EXPORT
 Invoice Date ^{FILE HOLD*} Aug 31, 2023

Phone: 250-6669 or 261-1424
 EMAIL: matsoninc@yahoo.com

WESTMOR
ZIP TRIP KALISPELL MT

OWNERS SCOTT MATSON &
 CONNIE HAMILTON-MATSON

Customer ID	Customer PO	Payment Terms	Due Date
WESTMOR	MATERIAL CONTIMINATI	Net 10th of Next Month	9/10/23

Quantity	Description	Unit Price	Extension
500.00	500 YARDS OF CONTAMINATED SOILS, EXCAVATED, LOADED AND HAULED TO HOLDING SITE, PREP HOLDING SITE WITH PLASTIC LINING. IMPORT STRUCTURAL BACKFILL MATERIAL	180.30	90,150.00

Total Invoice Amount 90,150.00

Payment Received

TOTAL 90,150.00

Thank you for doing business with Scott and Connie

Matson Trucking & Excavating
288 Half Moon Road
Columbia Falls, MT 59912

Invoice

Invoice Number **CONTAMINA**
 Invoice Date **SEP 27, 2023**

Phone: 250-6669 or 261-1424
 EMAIL: matsoninc@yahoo.com

WESTMOR
ZIP TRIP KALISPELL MT

OWNERS SCOTT MATSON &
 CONNIE HAMILTON-MATSON

Customer ID	Customer PO	Payment Terms	Due Date
WESTMOR	CONTAMINATED FILL	Net 10th of Next Month	10/10/23

Quantity	Description	Unit Price	Extension
1.00	IMPORT LOADER, LOAD AND HAUL CONTAMINATED FILL FROM HOLDING AREAS TO LANDFILL, RECLAIMED DUMPING AREA, LANDFILL FEES	56,709.05	56,709.05

Total Invoice Amount 56,709.05

Payment Received

TOTAL 56,709.05

Thank you for doing business with Scott and Connie



Westmor Industries LLC

3 Development Drive
 PO Box 683
 Morris MN 56267

Fax: (320) 589-2206
 Phone: (320) 589-2100
 Web: www.westmor-ind.com

INVOICE DATE

11/17/2023

INVOICE # 1923684 RI

BILL TO:

163724

Zip Trip
 4407 N Division Street
 Spokane WA 99207

SHIP TO:

536685

Zip Trip #39
 305 E Idaho St
 Kalispell MT 59901

Note: All returns must have prior approval. No returns on electronic parts. Special order parts and parts returned after 20 days will be assessed a 20% restocking charge.

ORDER #	P.O. NUMBER	SALESMAN	SHIP VIA			TERMS	
750276	Steve Haase	Tony Ascheman	Ground			Net 30 Days	
LINE.REL	ITEM NUMBER / DESC	UOM/ INV#	QTY ORDER	QTY SHIP	QTY BCKORD	UNIT PRICE	EXT PRICE
1.00	FS-BP-RF LABOR RELATED TO CONTAMINATION 2 MEN x 37.50 HOURS x \$150.00	EA	1.00	1.00		\$11,250.00	\$11,250.00

When digging the hole found out they had soil contamination and water on site. Labor hours on site for pumping water and helping with contaminated soil.

Crushed tanks, loaded and removed from site. Backfill and compact tank hole which tanks came out of. Started digging new tank hole found contaminated soil at approx 10' . Called randy sherbet which called DEQ. We took soil samples and marks man took them to lab. Conversation with randy and Chris from DEQ , soils consultant will be contacted to assess site. They showed up at approx 3:00pm and took soil and water samples. They will be back on monday to oversee excavation. Mark Vigesaa 8/24/2023

Went excavator co site to remove plastic from island forms and sand sumps. Had numerous phone calls with office due to never ending changes on site also had conversations with excavator on plan changes. Will set tanks on ground tomorrow and start digging tank hole. Mark Vigesaa 8/25/2023

Made pea gravel saddles and set tanks on ground. Excavated soil from new tank hole and followed contamination path. Appears to be at 8 to 11 ft in depth and goes west and south. Mark Vigesaa 8/26/2023 SATURDAY

Measured site dimensions, existing tank and dispenser, bld,streets etc. then went to mats on excavating site and stripped island forms of plastic coating which came off in little icy bitty pieces.bought scrapers and paint thinner to take it off. Got most of it off but there's still more. Loaded up island forms and took too job site and unloaded. Picked up paint remover discs and other materials to clean island forms up. Worked on tank and piping removal paper work.Mark Vigesaa 8/27/2023 SUNDAY

Please provide your invoice number or account number on your payment. Thank you. NEW! Would you like us to email your invoices instead of receiving a paper copy? Please provide your email address, contact name and customer number for each account to ar@westmor-ind.com BY ACCEPTANCE OF THE GOODS TO WHICH THIS INVOICE RELATES, PURCHASER ACKNOWLEDGES AND AGREES THAT IT HAS HAD THE OPPORTUNITY TO REVIEW THOSE TERMS AND CONDITIONS OF WESTMOR INDUSTRIES, LLC. AVAILABLE ONLINE AT WESTMOR-IND.COM/TERMS , AND THE PARTIES INTEND TO BE BOUND BY SUCH TERMS AND CONDITIONS, WHICH ARE HEREBY INCORPORATED BY REFERENCE. A HARD COPY OF SUCH TERMS AND CONDITIONS WILL BE PROVIDED BY WESTMOR INDUSTRIES, LLC TO PURCHASER UPON REQUEST.	Sales Amount	USD \$11,250.00
	Sales Tax	0 %
	TOTAL	USD \$11,250.00



Executive Summary
MDT White Sulphur Springs 3rd Ave SW
DEQ Facility ID # 30-12376 (TID 25004), DEQ Release #6522,
Work Plan #716834821

DISPUTE TO ADJUSTMENTS OF CLAIM #20260108C

TYPE OF ACTION: Claim Adjustment Dispute

ACTIONS REQUESTED: Owner/operator requests a hearing before the Board to address the staff recommendation of denial of claim 20260108C related to work plan 716834821, release 6522, MDT White Sulphur Springs 3rd Ave SW, DEQ Facility ID # 30-12376 (TID 25004).

BOARD STAFF RECOMMENDATIONS: Denial of claimed laboratory analysis costs (\$18,333.40) in claim 20260108C, and denial of any future laboratory costs related to the work plan unless claim is supported by change order (Form 8) approved prior to costs incurred.

ISSUE: The Board staff have determined claim 20260108C consists of costs specifically excluded from work plan 716834821, and by their exclusion did not receive Department approval as required by statute [§75-11-309(1)(h), MCA, ARM 17.58.311(2)(a), 311(10), 311(20)(a), 311(24)(a)(i), ARM 17.58.344(1)].

BACKGROUND: The Cost Estimate in the approved Work Plan specifically excluded laboratory analysis costs, noting the lab costs would be borne by MDT. During budget review and obligation process, this exclusion of lab analysis costs was discussed and confirmed with consultant's project manager Jason Decker. The requirement for the change order (Form 8) for reimbursement for lab costs was communicated to the project manager at that time.

Funding obligation was aligned with the work plan's budget, as required by law, and the obligation letter discussed the requirement for the change order (Form 8) necessary for coverage of laboratory costs in multiple places.

The Board staff later received a claim (20260108C) from MDT consisting of lab costs. After review of the approved work plan (and associated budget), the funding obligation, and the associated communication about the missing budget for the laboratory costs, the claim was denied. The Board staff do not dispute the necessity of the lab analysis, but are precluded by statute from reimbursing those laboratory analysis costs as the process required by statute was not followed, and thus the reimbursement of costs is not allowed by law. *Note: there was no indication that MDT would be seeking reimbursement for lab costs until the claim was received.*

CHRONOLOGY:

- FEBRUARY 06, 2024 DEQ Requests work plan 34821 for release 6522.
- JANUARY 25, 2024 DEQ Approves work plan 34821.
- MAY 24, 2024 During the PTRCB staff's budget review process, the laboratory fees were a topic of discussion with Pioneer (Jason Decker) in a May 24, 2024, email: "Lab Analyses- as noted in the work plan's cost estimate, you had not included those lab costs in the cost estimate...with expectation that lab costs would be borne by MDOT. **If MDOT does want reimbursement for those costs**, please coordinate with MDOT to submit a Form 8 to cover those anticipated cost (submit to William Bergum, the PTCS case manager).
- MAY 24, 2024 Pioneer (Jason Decker) indicated "I will coordinate with MDT as necessary."
- MAY 25, 2024 Funding Obligation Letter sent to owner, consultant and PTC case manager. The funding obligation letter highlighted twice the change order (Form 8) requirement twice.
- "The costs for analysis of the groundwater samples are not included in the budget reviewed by PTRCB staff. Consequently, costs for lab analyses of samples are not included in this obligation though such activities are included in the narrative of the work plan. A Form 8 specifying these lab costs would be appropriate documentation if it is anticipated that these costs will be claimed in the future."*
- "NOTE: as requested in the consultant's workplan, costs for the planned analyses have not been included. It is noted in the work plan that analytical costs will be invoiced to Montana Department of Transportation (MDOT). If MDOT plans to claim these lab costs, please submit a Form 8 for review and modification of the obligated task budget. The above reimbursement is for the PTRCB sample fee on the planned eleven (11) groundwater samples..."*
- JANUARY 8, 2026 Claim 20260108C received by PTRCB. Note: claim included an unsigned Form 8 dated 12/2/2025 (which post-dates the lab invoices). Law requires Department approval before the work is performed.
- APRIL 7, 2026 Recommended Adjustment letter adjusting all claimed costs (claim denied) sent to consultant/owner.
- APRIL 13, 2026 K.Gustafson, MDT communicates intention to dispute claim adjustment/denial.
- MAY 11, 2026 PTRC staff send the dispute process requirements to K.Gustafson, MDT.

MAY 28, 2026

Joe Radonich, Supervisor Environmental Services Bureau, MDT,
officially requests to dispute claim.

BOARD OPTIONS:

- Ratify the staff recommendation of Denial of Claim 20260108C
- Reject the staff recommendation and propose alternate motion based upon provisions of statute and/or rule. If the staff recommendation is rejected, provide rationale for the decision.

STATUTES AND RULES:

§75-11-309(1)(h), MCA, Procedures For Reimbursement Of Eligible Costs -- Corrective Action Plans. (h) The owner or operator shall implement the corrective action plan or plans approved by the department until the release is resolved. The department may oversee the implementation of the plan, require reports and monitoring from the owner or operator, undertake inspections, and otherwise exercise its authority concerning corrective action under Title 75, chapter 10, part 7, Title 75, chapter 11, part 5, and other applicable law and rules.

ARM 17.58.311(2) "Actually incurred," for purposes of reimbursing eligible costs caused by a release from a petroleum storage tank, means: (a) costs actually expended to complete the work required to prepare or implement a corrective action plan, in an amount less than or equal to the corrective action plan budget, as shown by a dated invoice and receipt;

311(10) "Corrective action plan budget" means the costs listed in the corrective action plan and preliminarily approved in writing by the board staff for obligation by the board pursuant to 75-11-309(5), MCA.

311(20) "Necessarily incurred," for purposes of reimbursing eligible costs caused by a release from a petroleum storage tank. means: (a) only those costs incurred that are needed to prepare or implement a corrective action plan, in an amount less than or equal to the costs listed in the corrective action plan budget;

311(24) "Reasonably incurred," for purposes of reimbursing eligible costs caused by a release from a petroleum storage tank, means: (a) the costs incurred: (i) to complete the work required to prepare or implement an approved corrective action plan, in an amount less than or equal to the costs listed in the corrective action plan budget;

ARM 17.58.344(1), REVIEW OF CORRECTIVE ACTION PLAN

(1) The board staff will review each corrective action plan and **establish the allowable reimbursement for each corrective action in a corrective action plan budget**. If the review indicates that the fund is not being used in accordance with 75-11-313(3), MCA, the board staff will notify the board chairperson and provide an explanation of the board staff's findings. The chairperson will then review the evidence and decide whether to initiate a third-party review. If the chairperson decides to initiate a third-party review, he or she will submit a corrective action plan for review to a qualified third party of his or her choosing. The results of the third-party review will be included in the board's corrective action plan review process per 75-11-312, MCA.



Petroleum Tank Release Compensation Board

PO Box 200902 Helena, MT 59620 -0902 (406)444-9710

<http://deq.mt.gov/cleanupandrec/programs/ptrcb>

April 07, 2026

Montana Dept of Transportation (OWNER)

Joe Radonich
2701 Prospect Ave
Helena, MT 59620 - 1001

Location White Sulphur Springs
Facility ID 3012376
Facility Name MDT White Sulphur Springs 3rd Ave SW

SUBJECT: Recommended Adjustment(s) to Claim for Reimbursement

The Board staff has proposed the following adjustment(s) to this claim and has temporarily suspended it to allow an opportunity for you to comment on the proposed adjustment(s). Review the adjustments and contact me by phone or email within 14 calendar days of this date to discuss the specifics of any issue(s) you may have with the adjustment(s). After 14 days, the suspended claim will be released for processing.

If the adjustment can't be resolved at the staff level, you may dispute the proposed adjustment(s) at the next Board meeting. Should this be necessary, please notify me via email so that I may request to have this matter placed on the agenda of the meeting. Once the Board has made a determination, any dispute will be conducted according to Montana Code Annotated and compliant with the Montana Administrative Procedures Act.

Claim ID: 20260108C

Release ID: 6522

Ordinal: 7

Claim Amount: \$18,333.40

Reimbursement To-date: \$45,342.09

Adjustments:

<u>Action</u>	<u>Amount</u>	<u>Comment</u>
Denied	\$18,333.40	As noted in the PTRCB funding obligation letter, "If MDOT plans to claim these lab costs, please submit a form 8 for review and modification of the obligated task budget".

Total Adjustment \$18,333.40

If you have any questions please contact me at (406) 444-9717 or via email ajpate@mt.gov.

Sincerely,

AJ Pate
Fund Cost Specialist



Petroleum Tank Release Compensation Board

Initial Claim Review

Claim Ordinal 7

Facility Name: **MDT White Sulphur Springs 3rd Ave SW**

Facility: **3012376**

City: **White Sulphur Springs**

County: **Meagher**

Claim ID: **20260108C**

Release ID: **6522**

Region: **2**

Date Claimed: **1/8/2026**

Eligible: **Eligible**

AO: **AJ Pate**

Amount: **\$18,333.40**

Reimbursed to date: **\$24,271.23**

PRS Mgr: **William Bergum**

[See Invoice Summary](#)

Initial Review

REVIEWED

By Taylor Pirre at 11:35 am, Feb 02, 2026

Tech Review

processing

By A.J. Pate at 10:29 am, Feb 12, 2026

REVIEWED

By A.J. Pate at 7:57 am, May 11, 2026

**MONTANA PETROLEUM TANK RELEASE COMPENSATION BOARD
CLAIM FOR REIMBURSEMENT –CORRECTIVE ACTION
FORM 3**

20260108C

Claims should be submitted upon completion of a task or tasks of a Department approved corrective action plan for a single petroleum release. A separate claim form is required for each release. Please review the [Form 3 Instructions](#) before completing this form. If you require assistance, contact Board Staff at 406-444-9710.

If costs for PTRCB-eligible release investigation and cleanup activities, for which you are seeking reimbursement, have been paid by another funding source and you would like to allocate them towards the required PTRCB copy for this release, please review our Form 11 and its instructions, found on the [Forms page](#) of our website, BEFORE completing and submitting this claim Form 3.

1. Facility and Petroleum Release Information	
Name of Facility:	MDT White Sulphur Springs 3rd Ave SW
Street Address:	705 3rd Ave SW
City:	White Sulphur Springs, MT
DEQ Facility Identification Number:	3012376 ✓
DEQ Petroleum Release Number: (only one release #)	6522 ✓

Petroleum Tank Release
Compensation Board
RECEIVED CH

JAN 08 2026

P.O.P.V ✓

2. Owner – Name and Address		3. Operator – Name and Address		4. Payable to: – Name and Address (Required)	
Montana Department of Transportation		Montana Department of Transportation		Montana Department of Transportation	
PO Box 201001 ✓		PO Box 201001		PO Box 201001	
Helena MT 59620 ✓		Helena MT 59620		Helena MT 59620	
Attn:	Joe Radonich ✓	Attn:	Kendall Gustafson	Attn:	Sharayah Clancy
Phone Number:	406 444 9204	Phone Number:	406 444 7224	Phone Number:	406 444 6026
Fax Number:		Fax Number:		Fax Number:	
Email Address:	jradonich@mt.gov	Email Address:	kgustafson@mt.gov	Email Address:	
Do you want to receive Email about this claim?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Do you want to receive Email about this claim?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Do you want to receive Email about this claim?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

5. Claimant – Name and Address		6. Consultant – Name and Address		7. Any other person – Name and Address	
Montana Department of Transportation					
PO Box 201001					
Helena MT 59620					
Attn:	Joe Radonich	Attn:		Attn:	
Phone Number:	406 444 9204	Phone Number:		Phone Number:	
Fax Number:		Fax Number:		Fax Number:	
Email Address:	jradonich@mt.gov	Email Address:		Email Address:	
Do you want to receive Email about this claim?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Do you want to receive Email about this claim?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Do you want to receive Email about this claim?	Yes <input type="checkbox"/> No <input type="checkbox"/>

8. Total amount of this claim (including all page 2's):	\$18,333.40 ✓
--	---------------

E-MAILED
1/22/2026

12. Owner Certification: I certify under penalty of perjury that this submitted claim is for work that was actually completed; that the work performed was necessary to clean up the petroleum release at the facility identified in **Section 1**; that the cost of work for which reimbursement is sought is reasonable; and that to the best of my knowledge, all information herein provided is true and correct. **NOTE: If someone is submitting the claim on behalf of the owner/operator, skip Section 12 and complete Section 13. See the [Form 3 instructions](#).**


Joseph Radonich
 Owner/Operator Signature
JOSEPH RADONICH

12-31-2025
 Date

Typed Name of Owner/Operator

State of MONTANA
 County of Lewis & Clark
 Signed and Sworn before me on this day 12/31/2025 by JOSEPH RADONICH
 Date Person who signed above

(SEAL)



ALISELINA STRONG
 NOTARY PUBLIC for the
 State of Montana
 Residing at Helena, Montana
 My Commission Expires
 January 20, 2029

Notary Public Signature

 Printed or typed

 Notary Public for the State of

 Residing at

 My Commission Expires

13. Claimant Certification: I certify under penalty of perjury that I am authorized to submit claims on behalf of the owner or operator for this release and the information on this claim form is true to the best of my knowledge. This claim is submitted for work that was actually completed.


 Claimant Signature

 Date

 Typed Name of Claimant

State of _____
 County of _____
 Signed and Sworn before me on this day _____ by _____
 Date Person who signed above

(SEAL)



ALISELINA STRONG
 NOTARY PUBLIC for the
 State of Montana
 Residing at Helena, Montana
 My Commission Expires
 January 20, 2029

Notary Public Signature

 Printed or typed

 Notary Public for the State of

 Residing at

 My Commission Expires

Submit this completed claim and supporting documents to the following address:
PETROLEUM TANK RELEASE COMPENSATION BOARD
PO BOX 200902, HELENA MT 59620-0902



Petroleum Tank Release Compensation Board

STATE OF MONTANA

P.O. Box 200902 • Helena, MT 59620-0902 • (406) 444-9710 • Website:
<http://deq.mt.gov/DEQAdmin/pet>

December 04, 2024

Aaron Anderson
Montana Department of Transportation
P.O. Box 201001
Helena, MT 59620

SUBJECT: Petroleum Tank Release Compensation Board (PTRCB) staff review of the costs for the Remediation Work Plan submitted by Pioneer Technical Services Inc, dated November 30, 2023, for the petroleum release at the MDT White Sulphur Springs Maintenance Facility, 705 3rd Ave SW, White Sulphur Springs, Montana; Facility ID 3012376 (TID 25004), Release 6522, Work Plan 34821. [Modified to include Form 8 dated November 11, 2024]

Dear Mr. Anderson:

Please visit our website (<http://deq.mt.gov/DEQAdmin/PET/codesratestasks>) for general information concerning PTRCB's review of this corrective action plan, the allocation of costs to tasks, associated codes, and standards associated with reimbursement of claims.

The Board staff would recommend approval of claims for the following work not to exceed the total cost of ~~\$50,005.25~~ \$64,979.76 for the following tasks as proposed in the corrective action work plan. Note that underlined items are changes made by the Board staff from the original work plan submitted.

Note: this current PTRCB funding obligation letter corrects details from the earlier incorrect May 25th version. The task budgets and descriptions remain unchanged from the May 25, 2024, version.

This current modification of the PTRCB funding obligation letter is to communicate the changed scope of work detailed in Pioneer Technical Services' Form 8 dated 11 November 2024. The modifications are highlighted in blue font.

The costs for analysis of the groundwater samples are not included in the budget reviewed by PTRCB staff. Consequently, costs for lab analyses of samples are not included in this obligation though such activities are included in the narrative of the work plan. A Form 8 specifying these lab costs would be appropriate documentation if it is anticipated that these costs will be claimed in the future.

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024, [modified on Dec 04, 2024](#).

Page 2 of 5

- **Task 1 – Work Plan Preparation – ~~\$1,400.00~~**
 - Reimburse no more than the maximum reimbursable costs for preparation of a Remedial Investigation Work Plan.

- **Task 2 – Project Management – ~~\$3,773.00~~ \$4,921.00**
 - Reimbursement for project management. This task is the process of creating, monitoring, controlling the scope of work, scheduling and budgeting of all phases of environmental work. Task includes communications with the owner/operator and agency. Project management also includes coordination, staff oversight, scheduling, correspondence, permitting, and updating any health and safety plan.

- **Task 3 – Mobilization – ~~\$2,903.25~~ \$4,060.14**
 - Reimbursement of **\$3.83** per mile for **147 294** miles for mobilization of a technician level professional to worksite from consultant's nearest office to conduct the groundwater monitoring activities as described the work plan.
 - Reimbursement of **\$6.00** per mile for **147** miles for mobilization of drilling rig and operators to worksite from consultant's nearest office to conduct the drilling/completion activities described in the work plan.
 - Reimbursement of **\$5.88** per mile for **147** miles for mobilization of surveyor crew to worksite from consultant's nearest office to conduct the survey activities described in the work plan.
 - Reimbursement of **\$4.04** per mile for **147 294** miles for mobilization of a staff level professional to worksite from consultant's nearest office to conduct the oversight activities (soil boring and well installation, and related soil sampling) described in the work plan.
 - This mobilization task includes all costs and mileage to transport equipment, materials, and personnel to and from the site location. Included in this task is preparation time for loading and unloading equipment/materials and supplies and additional miles for hotel, meals, etc.
 - Mobilization distances are calculated from the consultant's office nearest to worksite.

- **Task 4 – Monitoring – ~~\$2,570.00~~ \$2,849.50**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 to monitor ~~ten (10)~~ **nine (9)** wells [and collect one (1) duplicate sample] on during one (1) sampling events.
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 to monitor ~~ten (10)~~ **two (2)** wells [and collect one (1) duplicate sample] on during one (1) sampling events.
 - This reimbursement includes costs for IBI modifier and duplicate sample modifier.
 - This reimbursement includes site setup, all labor, equipment, materials, and consumables for locating, monitoring, purging and collection of water samples. Recording the depth to groundwater is considered, by the State, a subtask of monitoring.
 - If a well's condition precludes sampling during the monitoring event, PTRCB will reimburse no more than the established standards as set forth in ARM 17.58.341 for well assessment at the particular well.

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024, [modified on Dec 04, 2024](#).

Page 3 of 5

- Reimbursement includes allowed PTRCB sampling fee at \$10.00 per sample, to cover ice, cooler, packing, shipping, and office-related handling charges.
- **Task 5 – Lab Analyses (Water Samples) – ~~\$110.00~~ \$130.00**
 - Reimbursement for the actual costs of analyses of up to ~~ten (10)~~ [eleven \(11\)](#) water samples [and ~~one (1)~~ [two \(2\)](#) duplicate] for the following set of analytes:
 - VPH (11 samples)
 - EPH Screens (11 samples)
 - EPH Fractions (5 samples)
 - Lead Scavenger-EDB (11 samples)
 - Lead Scavenger-DCA (11 samples)
 - Intrinsic Biological Indicators (1 samples)
 - Reimbursement includes actual costs for lab sample disposal costs.
 - Reimbursement of the PTRCB sampling fee for the management of the sample including sample container, cooler, packing, shipping, handling, sample preservation and office related charges.
 - NOTE: as requested in the consultant’s workplan, costs for the planned analyses have not been included. It is noted in the work plan that analytical costs will be invoiced to Montana Department of Transportation (MDOT). If MDOT plans to claim these lab costs, please submit a Form 8 for review and modification of the obligated task budget. The above reimbursement is for the *PTRCB sample fee* on the planned ~~eleven (11)~~ [thirteen \(13\)](#) groundwater samples.
- **Task 6 – Well Installation – ~~\$19,788.00~~ \$29,623.62**
 - Reimbursement for the labor, equipment, and materials costs to install up to ~~twenty (20)~~ [seventeen \(17\)](#) soil borings and complete up to ~~ten (10)~~ [nine \(9\)](#) of those soil borings into monitor wells.
 - [Reimbursement for the subcontracted costs of installing up to four \(4\) soil borings and completing up to two \(2\) of those soil borings into monitor wells.](#)
 - [The soil boring and well installation consumables and equipment will be reimbursed based on actual costs. Please include proof of payment when claiming these costs](#)
- **Task 7 – Equipment & Supplies – ~~\$637.50~~ \$917.50**
 - Reimbursement for 24 hours rental/use of PID meter (soil boring/well install oversight).
 - [Reimbursement for 16 hours rental/use of PID meter \(soil boring/well install oversight\).](#)
 - Reimbursement for two (2) days rental of concrete saw.
- **Task 8 – Well Development – ~~\$1,500.00~~ \$1,650.00**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 to develop up to ~~ten (10)~~ [eleven \(11\)](#) wells. Includes all labor, equipment, and materials.
- **Task 9 – Fieldwork (Soil Boring/Well Installation Oversight) – ~~\$5,964.00~~ \$7,242.00**
 - Reimbursement staff level professional labor to provide oversight on the subcontracted soil boring and well installation activities, including soil and stockpile confirmation sampling.

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024, [modified on Dec 04, 2024](#).

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- **Task 10 – Survey (Receptor) – \$1,300.00**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 for a receptor survey, including reporting aspects of the survey.
- **Task 11 – Miscellaneous (Petroleum Vapor Desktop Investigation) – \$1,180.00**
 - Reimbursement for the drafting of a desktop petroleum vapor intrusion investigation.
- **Task 12 – Lodging/Per Diem – ~~\$2,261.50~~ \$2,804.00**
 - Groundwater Monitoring: reimburse no more than actual costs of ~~one (1)~~ **two (2)** nights lodging and ~~two (2)~~ **four (4)** full day meals.
 - Geoprobe crew: reimburse no more than actual costs of eight (8) nights lodging and ten (10) full day meals.
 - Oversight: reimburse no more than actual costs of ~~four (4)~~ **six (6)** nights lodging and ~~five (5)~~ **eight (8)** full day meals.
 - Per diem (meals) will only be reimbursed for those hours when personnel are in travel status. Please see Standard Rates on our website for eligible hours.
- **Task 13 – Survey – \$1,312.00**
 - Reimburse for survey of the newly installed monitoring wells and soil boring locations.
 - Reimbursement for well notch surveys includes all labor and equipment necessary to complete the task, including both field and office components of the task.
- **Task 14 – Data Validation Summary Form – ~~\$142.00~~ \$426.00**
 - Reimburse no more than one(1) **three (3)** hours to fill out **three (3)** Data Validation Summary Forms (DVSF) not to exceed the approved Staff Engineer/Scientist/Geologist rate. Note: this task is not data validation per se, but only the clerical reporting of the data validation of one (1) dataset. The Petro-Fund considers the data validation effort to be inherent in the reporting task.
- **Task 15 – Release Closure Plan (Create) – \$1,464.00**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 for the creation to the Release Closure Plan (RCP).
- **Task 16 – Report (Remedial Investigation) – \$3,700.00**

Reimburse no more than the established standards as set forth in ARM 17.58.341 for preparation of a Groundwater Monitoring Report, including any required data validation

This obligation letter contains reimbursement for installation of monitoring wells. The Petroleum Tank Release Compensation Board (Board) has a reasonable expectation, based on §36.21.808 ARM, that an owner will maintain as an asset any well for which the costs are borne by the Petroleum Tank Release Cleanup Fund (Fund). This expectation is for the life of the release for which the well was installed so that access and proper usage can be maintained. The proper installation of these wells includes but not limited to the following considerations:

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024, [modified on Dec 04, 2024](#).

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a) adequate well depths and screening intervals corresponding to natural variations in water depth,
b) maximum expected loading in selection/design of wellhead/cover/mount design, etc. as part of the asset protection and maintenance expected for monies reimbursed for Well Installation from the Fund. Should wells become damaged or permanently inaccessible, the Board requests justification from the owner or their consultant for Fund liability for replacement or repair of those assets, if there still exists a current or future need for sampling from the damaged or lost asset.

The Board staff will not recommend reimbursement of costs exceeding those submitted and approved with this plan unless a written Corrective Action Plan Budget Modification Form (PTRCB Form 8) is received and approved. A data input form for the Form 8 can be found on the PTRCB web site at <https://deq.mt.gov/cleanupandrec/programs/ptrcb>.

The owner/operator is reminded all comments on the costs of work proposed in this plan are based on costs information supplied with the corrective action work plan.

Please be sure to read the Corrective Action approval letter from the Department of Environmental Quality for technical guidance pertaining to the completion of the above referenced work plan.

If you have questions regarding these comments pertaining to this corrective action plan, please contact me at (406) 444-9717 or email at ajpate@mt.gov.

Sincerely,



A.J. Pate
Fund Cost Specialist

cc: Jason Decker, Senior Engineer II, Pioneer Technical Services Inc
William Bergum, Environmental Project Officer, PTCS MTDEQ

Submitted by MDT for Claim 20260108C Adjustment Dispute



Director Christopher Dorrington

May 28, 2026

Terry Wadsworth
Executive Director
PTRCB
PO Box 200902
Helena, MT 59620-0902

Subject: *Hearing Request for disputed claim*
Claim ID: 20260108C
MDT White Sulphur Springs
Facility ID: 30-12376
Release ID: 6522

Let this letter serve as a hearing request from the Montana Department (MDT) of Transportation to the Petroleum Tank Release Compensation Board (PTRCB) to dispute the recommended adjustment for reimbursement to the referenced claim. The entire claim in the amount of \$18,333.40 has been recommended for denied payment based on that, PTRCB funding had not been previously obligated. The reimbursement request was solely for actual, reasonable, and necessary *laboratory analytical services* as part of an ongoing petroleum release investigation at the facility. The following presents a summary of actions leading up to the utilization of claimed services:

- February 6, 2024 – The Department of Environmental Quality (DEQ) Petroleum Tank Cleanup Section (PTCS) requires an Additional Corrective Action Work Plan from MDT for continued petroleum remedial investigation at the facility.
- February 15, 2024 – MDT solicits proposals from three environmental consultants for the preparation of the work plan and implementation of work based on the PTCS requirement. *The solicitation notes that MDT will pay for analytical services separately.*
- March 2024 - MDT executes a Purchase Order contract with Pioneer Technical Services (Pioneer) for implementation of the required petroleum remedial investigation work.
- March 15, 2024 – Pioneer submits required work plan to DEQ PTCS on MDT's behalf.
- April 25, 2024 – PTCS approves work plan submitted by Pioneer as work plan ID 34821.

- May 25, 2024 – PTRCB staff review and obligation of cost reimbursement for work plan ID 34821. The PTRCB review noted the following:
“The costs for analysis of the groundwater samples are not included in the budget reviewed by PTRCB staff. Consequently, costs for lab analysis of samples are not included in this obligation though such activities are included in the narrative of the work plan. A Form 8 specifying these lab costs would be appropriate documentation if it is anticipated that these costs will be claimed in the future.”
- May 28, 2024 – PTRCB corrected staff review letter *citing* MDTs contracted consultant.
- December 4, 2024 – updated PTRCB staff review letter of *additional costs* relating to a change in the number of soil borings and groundwater monitoring wells installed for the investigation of the facility.

Work plan ID 34821 was implemented by Pioneer throughout the second half of the year 2024 and into the first part of 2025. During the field investigation, Pioneer collected 67 soil samples and 10 groundwater samples for laboratory analysis. Laboratory analysis also included trip blanks and duplicate samples. The results of the laboratory analysis were documented in Pioneers Remedial Investigation Report dated April 25, 2025.

Pioneer executed a PTRCB Form 5 *Designation of Representative Use* to receive direct reimbursement for eligible costs in implementing work plan ID 34821, excluding laboratory analytical costs which MDT had committed to pay directly.

MDT routinely excludes laboratory analytical costs from Consultant cost estimates since MDT receives a 20% discount in fees. This direct payment by MDT reflects an overall project cost savings leveraging the discount and removing any potential Consultant markup fees.

As noted in the May 25, 2024, PTRCB staff review letter, reimbursement costs were not obligated for laboratory analytical services until a Form 8 was executed specifying these costs. Although both MDT and the Consultant knew of the need to execute the Form 8, a simple oversight error occurred and a completed form was subsequently not submitted.

Documents supporting the above summary are attached. MDT therefore respectfully requests that the laboratory analytical costs be considered *eligible* for reimbursement by the PTRCB as they are actual, reasonable and necessary for the overall petroleum release investigation at the facility.



Joseph Radonich
 Remediation & Assessment Section Supervisor
 Environmental Services Bureau
 Montana Department of Transportation



Petroleum Tank Release Compensation Board

PO Box 200902 Helena, MT 59620 -0902 (406)444-9710

<http://deq.mt.gov/cleanupandrec/programs/ptrcb>

April 07, 2026

Montana Dept of Transportation (OWNER)

Joe Radonich
2701 Prospect Ave
Helena, MT 59620 - 1001

Location White Sulphur Springs
Facility ID 3012376
Facility Name MDT White Sulphur Springs 3rd Ave SW

SUBJECT: Recommended Adjustment(s) to Claim for Reimbursement

The Board staff has proposed the following adjustment(s) to this claim and has temporarily suspended it to allow an opportunity for you to comment on the proposed adjustment(s). Review the adjustments and contact me by phone or email within 14 calendar days of this date to discuss the specifics of any issue(s) you may have with the adjustment(s). After 14 days, the suspended claim will be released for processing.

If the adjustment can't be resolved at the staff level, you may dispute the proposed adjustment(s) at the next Board meeting. Should this be necessary, please notify me via email so that I may request to have this matter placed on the agenda of the meeting. Once the Board has made a determination, any dispute will be conducted according to Montana Code Annotated and compliant with the Montana Administrative Procedures Act.

Claim ID: 20260108C

Release ID: 6522

Ordinal: 7

Claim Amount: \$18,333.40

Reimbursement To-date: \$45,342.09

Adjustments:

<u>Action</u>	<u>Amount</u>	<u>Comment</u>
Denied	\$18,333.40	As noted in the PTRCB funding obligation letter, "If MDOT plans to claim these lab costs, please submit a form 8 for review and modification of the obligated task budget".

Total Adjustment \$18,333.40

If you have any questions please contact me at (406) 444-9717 or via email ajpate@mt.gov.

Sincerely,

AJ Pate
Fund Cost Specialist

**MONTANA PETROLEUM TANK RELEASE COMPENSATION BOARD
CLAIM FOR REIMBURSEMENT –CORRECTIVE ACTION
FORM 3**

Claims should be submitted upon completion of a task or tasks of a Department approved corrective action plan for a **single** petroleum release. A **separate claim form is required for each release**. Please review the [Form 3 Instructions](#) before completing this form. If you require assistance, contact Board Staff at 406-444-9710.

If costs for PTRCB-eligible release investigation and cleanup activities, for which you are seeking reimbursement, have been paid by another funding source and you would like to allocate them towards the required PTRCB copay for this release, please review our Form 11 and its instructions, found on the [Forms page](#) of our website, BEFORE completing and submitting this claim Form 3.

1. Facility and Petroleum Release Information	
Name of Facility:	MDT White Sulphur Springs 3rd Ave SW
Street Address:	705 3rd Ave SW
City:	White Sulphur Springs, MT
DEQ Facility Identification Number:	3012376
DEQ Petroleum Release Number: (only one release #)	6522

2. Owner – Name and Address		3. Operator – Name and Address		4. Payable to: – Name and Address (Required)	
Montana Department of Transportation		Montana Department of Transportation		Montana Department of Transportation	
PO Box 201001		PO Box 201001		PO Box 201001	
Helena MT 59620		Helena MT 59620		Helena MT 59620	
Attn:	Joe Radonich	Attn:	Kendall Gustafson	Attn:	Sharayah Clancy
Phone Number:	406 444 9204	Phone Number:	406 444 7224	Phone Number:	406 444 6026
Fax Number:		Fax Number:		Fax Number:	
Email Address:	jradonich@mt.gov	Email Address:	kgustafson@mt.gov	Email Address:	
Do you want to receive Email about this claim?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Do you want to receive Email about this claim?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Do you want to receive Email about this claim?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

5. Claimant – Name and Address		6. Consultant – Name and Address		7. Any other person – Name and Address	
Montana Department of Transportation					
PO Box 201001					
Helena MT 59620					
Attn:	Joe Radonich	Attn:		Attn:	
Phone Number:	406 444 9204	Phone Number:		Phone Number:	
Fax Number:		Fax Number:		Fax Number:	
Email Address:	jradonich@mt.gov	Email Address:		Email Address:	
Do you want to receive Email about this claim?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Do you want to receive Email about this claim?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Do you want to receive Email about this claim?	Yes <input type="checkbox"/> No <input type="checkbox"/>

8. Total amount of this claim (including all page 2's):	\$18,333.40
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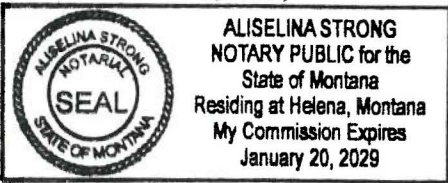
12. Owner Certification: I certify under penalty of perjury that this submitted claim is for work that was actually completed; that the work performed was necessary to clean up the petroleum release at the facility identified in **Section 1**; that the cost of work for which reimbursement is sought is reasonable; and that to the best of my knowledge, all information herein provided is true and correct. **NOTE: If someone is submitting the claim on behalf of the owner/operator, skip Section 12 and complete Section 13. See the [Form's instructions](#).**

Joseph Radonich
 Owner/Operator Signature
JOSEPH RADONICH
 Typed Name of Owner/Operator

12-31-2025
 Date

State of MONTANA
 County of Lewis & Clark
 Signed and Sworn before me on this day 12/31/2025 by JOSEPH RADONICH
 Date Person who signed above

(SEAL)



[Signature]
 Notary Public Signature
 Printed or typed
 Notary Public for the State of _____
 Residing at _____
 My Commission Expires _____

13. Claimant Certification: I certify under penalty of perjury that I am authorized to submit claims on behalf of the owner or operator for this release and the information on this claim form is true to the best of my knowledge. This claim is submitted for work that was actually completed.

 Claimant Signature

 Typed Name of Claimant

 Date

State of _____
 County of _____
 Signed and Sworn before me on this day _____ by _____
 Date Person who signed above

(SEAL)

 Notary Public Signature
 Printed or typed
 Notary Public for the State of _____
 Residing at _____
 My Commission Expires _____

Submit this completed claim and supporting documents to the following address:
PETROLEUM TANK RELEASE COMPENSATION BOARD
PO BOX 200902, HELENA MT 59620-0902

**Montana Petroleum Tank Release Compensation Board
Acknowledgment of Payment
Form 6**

This form acknowledges that payment for invoice(s) as shown below has been received and deposited or cashed. **If this form is submitted (Emailed copies are acceptable) after the claim for reimbursement, the correct claim number must be entered in the space provided below.** For assistance contact Board staff at 406-444-9710.

1. Facility Information

<i>Facility Name:</i>	
<i>Street Address:</i>	
<i>City:</i>	
<i>Facility Number:</i>	
<i>Release Number:</i>	

2. Claim Number(s) (if applicable):

3. Information regarding the invoice(s) for which payment has been received.

<i>Invoice#</i>	<i>Invoice Date</i>	<i>Invoiced Amount</i>	<i>Amount Received</i>	<i>Name of Company/Individual that paid you</i>
Total				

4. I acknowledge that my company has received payment as shown above.

Signature

Date

Signature Name (Typed or Printed)

Title

Company Name

Daytime Phone

Contact E-mail Address

Submit completed form to:
**Petroleum Tank Release Compensation Board
PO Box 200902
Helena MT 59620-0902**



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www.energylab.com

Billings, MT 406.252.6325 • Casper, WY 307.235.0515
Gillette, WY 307.686.7175 • Helena, MT 406.442.0711

Remit To: **Energy Laboratories, Inc.**
Department 6250
PO Box 4110
Woburn, MA 01888-4110

Account Number: M1249
Invoice Number: 669671
Invoice Date: 10/31/2024
Purchase Order:
Invoice Total: \$8,380.40
Amount Received: \$0.00
Amount Due: \$8,380.40

00000M12490006696710008380400

Detach and Return Stub with Payment

Bill To: **MT Dept of Transportation**
Attn: Accounts Payable
PO Box 201001
Helena, MT 59620-1001

INVOICE

Invoice No.: 669671

Invoice Date: Oct 31, 2024

Purchase Order:

Account Number: M1249

Net 30

From: 
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Quote Id: N/A
Project Name: MDT WSS Maintenance Facility

Lab Number	Client Samp ID	Test Price	Rush	Discount	Price	Total
Work Order: H24100357						
H24100357-001	MW-1					\$323.60
Lead Scavengers-Soil						
EDB & EDC in soil by ECD		\$85.00		20%	\$68.00	
8260-VOCs, Low Level - Short List		\$85.00		20%	\$68.00	
Montana VPH-Field Extracted						
Volatile Petroleum Hydrocarbons		\$132.00		20%	\$105.60	
Methanol Extraction for Volatiles SW5035		\$2.50		20%	\$2.00	
Percent Moisture		\$17.00		20%	\$13.60	
Analysis Parameter						
Hydrocarbons, Extractable Petroleum-Scrn		\$83.00		20%	\$66.40	
H24100357-002	MW-1					\$323.60
Lead Scavengers-Soil						
EDB & EDC in soil by ECD		\$85.00		20%	\$68.00	
8260-VOCs, Low Level - Short List		\$85.00		20%	\$68.00	
Montana VPH-Field Extracted						
Volatile Petroleum Hydrocarbons		\$132.00		20%	\$105.60	
Methanol Extraction for Volatiles SW5035		\$2.50		20%	\$2.00	
Percent Moisture		\$17.00		20%	\$13.60	
Analysis Parameter						
Hydrocarbons, Extractable Petroleum-Scrn		\$83.00		20%	\$66.40	
H24100357-003	MW-1					\$323.60
Lead Scavengers-Soil						
EDB & EDC in soil by ECD		\$85.00		20%	\$68.00	
8260-VOCs, Low Level - Short List		\$85.00		20%	\$68.00	
Montana VPH-Field Extracted						
Volatile Petroleum Hydrocarbons		\$132.00		20%	\$105.60	
Methanol Extraction for Volatiles SW5035		\$2.50		20%	\$2.00	



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Invoice Number:

10/31/2024
669671

Percent Moisture	\$17.00	20%	\$13.60	
Analysis Parameter				
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40	
H24100357-004 MW-2				\$323.60
Lead Scavengers-Soil				
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00	
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00	
Montana VPH-Field Extracted				
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60	
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00	
Percent Moisture	\$17.00	20%	\$13.60	
Analysis Parameter				
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40	
H24100357-005 MW-2				\$323.60
Lead Scavengers-Soil				
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00	
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00	
Montana VPH-Field Extracted				
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60	
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00	
Percent Moisture	\$17.00	20%	\$13.60	
Analysis Parameter				
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40	
H24100357-006 MW-2				\$323.60
Lead Scavengers-Soil				
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00	
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00	
Montana VPH-Field Extracted				
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60	
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00	
Percent Moisture	\$17.00	20%	\$13.60	
Analysis Parameter				
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40	
H24100357-007 MW-3				\$323.60
Lead Scavengers-Soil				
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00	
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00	
Montana VPH-Field Extracted				
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60	
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00	
Percent Moisture	\$17.00	20%	\$13.60	
Analysis Parameter				
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40	
H24100357-008 MW-3				\$459.60
EPH Afterscreen Soil w/o PAH				
Hydrocarbons, Aliphatic Extractable Petroleum	\$85.00	20%	\$68.00	
Hydrocarbons, Aromatic Extractable Petroleum	\$85.00	20%	\$68.00	
Lead Scavengers-Soil				
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00	
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00	
Montana VPH-Field Extracted				
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60	
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00	
Percent Moisture	\$17.00	20%	\$13.60	
Analysis Parameter				
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40	
H24100357-009 MW-3				\$459.60
EPH Afterscreen Soil w/o PAH				
Hydrocarbons, Aliphatic Extractable Petroleum	\$85.00	20%	\$68.00	
Hydrocarbons, Aromatic Extractable Petroleum	\$85.00	20%	\$68.00	



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Invoice Number:

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Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Percent Moisture	\$17.00	20%	\$13.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
H24100357-010 MW-4			\$459.60
EPH Afterscreen Soil w/o PAH			
Hydrocarbons, Aliphatic Extractable Petroleum	\$85.00	20%	\$68.00
Hydrocarbons, Aromatic Extractable Petroleum	\$85.00	20%	\$68.00
Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Percent Moisture	\$17.00	20%	\$13.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
H24100357-011 MW-4			\$459.60
EPH Afterscreen Soil w/o PAH			
Hydrocarbons, Aliphatic Extractable Petroleum	\$85.00	20%	\$68.00
Hydrocarbons, Aromatic Extractable Petroleum	\$85.00	20%	\$68.00
Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Percent Moisture	\$17.00	20%	\$13.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
H24100357-012 MW-4			\$323.60
Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Percent Moisture	\$17.00	20%	\$13.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
H24100357-013 MW-4			\$321.60
Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			
Percent Moisture	\$17.00	20%	\$13.60
Montana VPH-Lab Extracted			
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
H24100357-014 SB-16			\$323.60
Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			



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Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Percent Moisture	\$17.00	20%	\$13.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
H24100357-015 SB-16			\$323.60
Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Percent Moisture	\$17.00	20%	\$13.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
H24100357-016 SB-16			\$323.60
Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Percent Moisture	\$17.00	20%	\$13.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
H24100357-017 MW-5			\$323.60
Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Percent Moisture	\$17.00	20%	\$13.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
H24100357-018 MW-5			\$323.60
Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Percent Moisture	\$17.00	20%	\$13.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
H24100357-019 MW-5			\$323.60
Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Percent Moisture	\$17.00	20%	\$13.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
H24100357-020 SB-17			\$323.60
Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			



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Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Percent Moisture	\$17.00	20%	\$13.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
H24100357-021 SB-17			\$323.60
Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Percent Moisture	\$17.00	20%	\$13.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
H24100357-022 MW-6			\$323.60
Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Percent Moisture	\$17.00	20%	\$13.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
H24100357-023 MW-6			\$323.60
Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Percent Moisture	\$17.00	20%	\$13.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
H24100357-024 MW-6			\$323.60
Lead Scavengers-Soil			
EDB & EDC in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
Montana VPH-Field Extracted			
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Percent Moisture	\$17.00	20%	\$13.60
Analysis Parameter			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40

MISCELLANEOUS CHARGE SUMMARY:			
Work Order: H24100357			
Item	Price	QTY	Total
Sample Management/Disposal: Standard - per sample	\$3.00	24	\$72.00
			\$72.00

Comments:
Proj. Contact: Robyn Sargent

Subtotal: \$8,308.40
Misc Charges: \$72.00

INVOICE TOTAL: \$8,380.40
Amount Received: \$0.00
AMOUNT DUE: \$8,380.40



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Billings, MT 406.252.6325 • Casper, WY 307.235.0515
Gillette, WY 307.686.7175 • Helena, MT 406.442.0711

Remit To: **Energy Laboratories, Inc.**
Department 6250
PO Box 4110
Woburn, MA 01888-4110

Account Number: M1249
Invoice Number: 671329
Invoice Date: 11/07/2024
Purchase Order:
Invoice Total: \$9,307.60
Amount Received: \$0.00
Amount Due: \$9,307.60

00000M12490006713290009307603

Detach and Return Stub with Payment

Bill To: **MT Dept of Transportation**
Attn: MDT Environmental Services Bureau
PO Box 201001
Helena, MT 59620-1001

INVOICE

Invoice No.: 671329

Invoice Date: Nov 07, 2024

Purchase Order:

Account Number: M1249

Net 30

From: 
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Quote Id: N/A
Project Name: MDT WSS Maintenance Facility

Lab Number	Client Samp ID	Test Price	Rush	Discount	Price	Total
Work Order: B24101170						
B24101170-001	MW-7 (15-18)					\$323.60
Lead Scavengers-S						
EDB in soil by ECD		\$85.00		20%	\$68.00	
8260-VOCs, Low Level - Short List		\$85.00		20%	\$68.00	
MT EPH and VPH-Field Extracted						
Hydrocarbons, Extractable Petroleum-Scrn		\$83.00		20%	\$66.40	
Percent Moisture		\$17.00		20%	\$13.60	
Methanol Extraction for Volatiles SW5035		\$2.50		20%	\$2.00	
Volatile Petroleum Hydrocarbons		\$132.00		20%	\$105.60	
B24101170-002	MW-7 (18-20)					\$323.60
Lead Scavengers-S						
EDB in soil by ECD		\$85.00		20%	\$68.00	
8260-VOCs, Low Level - Short List		\$85.00		20%	\$68.00	
MT EPH and VPH-Field Extracted						
Hydrocarbons, Extractable Petroleum-Scrn		\$83.00		20%	\$66.40	
Percent Moisture		\$17.00		20%	\$13.60	
Methanol Extraction for Volatiles SW5035		\$2.50		20%	\$2.00	
Volatile Petroleum Hydrocarbons		\$132.00		20%	\$105.60	
B24101170-003	SB-18 (10-12)					\$323.60
Lead Scavengers-S						
EDB in soil by ECD		\$85.00		20%	\$68.00	
8260-VOCs, Low Level - Short List		\$85.00		20%	\$68.00	
MT EPH and VPH-Field Extracted						
Hydrocarbons, Extractable Petroleum-Scrn		\$83.00		20%	\$66.40	
Percent Moisture		\$17.00		20%	\$13.60	
Methanol Extraction for Volatiles SW5035		\$2.50		20%	\$2.00	
Volatile Petroleum Hydrocarbons		\$132.00		20%	\$105.60	
B24101170-004	SB-18 (14-15)					\$323.60



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B24101170-004	SB-18 (14-15)			\$325.00
Lead Scavengers-S				
EDB in soil by ECD		\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List		\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted				
Hydrocarbons, Extractable Petroleum-Scrn		\$83.00	20%	\$66.40
Percent Moisture		\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035		\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons		\$132.00	20%	\$105.60
B24101170-005	SB-19 (4-6)			\$459.60
EPH Afterscreen Soil w/o PAH				
Hydrocarbons, Aliphatic Extractable Petroleum		\$85.00	20%	\$68.00
Hydrocarbons, Aromatic Extractable Petroleum		\$85.00	20%	\$68.00
Lead Scavengers-S				
EDB in soil by ECD		\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List		\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted				
Hydrocarbons, Extractable Petroleum-Scrn		\$83.00	20%	\$66.40
Percent Moisture		\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035		\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons		\$132.00	20%	\$105.60
B24101170-006	SB-19 (8-10)			\$323.60
Lead Scavengers-S				
EDB in soil by ECD		\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List		\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted				
Hydrocarbons, Extractable Petroleum-Scrn		\$83.00	20%	\$66.40
Percent Moisture		\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035		\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons		\$132.00	20%	\$105.60
B24101170-007	SB-19 (16-18)			\$323.60
Lead Scavengers-S				
EDB in soil by ECD		\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List		\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted				
Hydrocarbons, Extractable Petroleum-Scrn		\$83.00	20%	\$66.40
Percent Moisture		\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035		\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons		\$132.00	20%	\$105.60
B24101170-008	MW-8 (5-7)			\$323.60
Lead Scavengers-S				
EDB in soil by ECD		\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List		\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted				
Hydrocarbons, Extractable Petroleum-Scrn		\$83.00	20%	\$66.40
Percent Moisture		\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035		\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons		\$132.00	20%	\$105.60
B24101170-009	MW-8 (12-14)			\$323.60
Lead Scavengers-S				
EDB in soil by ECD		\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List		\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted				
Hydrocarbons, Extractable Petroleum-Scrn		\$83.00	20%	\$66.40
Percent Moisture		\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035		\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons		\$132.00	20%	\$105.60
B24101170-010	MW-8 (18-20)			\$323.60
Lead Scavengers-S				
EDB in soil by ECD		\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List		\$85.00	20%	\$68.00



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MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-011 MW-9 (8-10)			\$323.60
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-012 MW-9 (16-18)			\$323.60
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-013 SB-20 (8-10)			\$323.60
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-014 SB-20 (12-15)			\$323.60
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-015 SB-21 (2-5)			\$459.60
EPH Afterscreen Soil w/o PAH			
Hydrocarbons, Aliphatic Extractable Petroleum	\$85.00	20%	\$68.00
Hydrocarbons, Aromatic Extractable Petroleum	\$85.00	20%	\$68.00
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-016 SB-21 (10-12)			\$323.60
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60



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Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-017 SB-21 (18-20)			\$323.60
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-018 SB-22 (2-5)			\$459.60
EPH Afterscreen Soil w/o PAH			
Hydrocarbons, Aliphatic Extractable Petroleum	\$85.00	20%	\$68.00
Hydrocarbons, Aromatic Extractable Petroleum	\$85.00	20%	\$68.00
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-019 SB-22 (7.5-10)			\$323.60
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-020 SB-23 (7-10)			\$323.60
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-021 Duplicate #1			\$323.60
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-022 Duplicate #2			\$459.60
EPH Afterscreen Soil w/o PAH			
Hydrocarbons, Aliphatic Extractable Petroleum	\$85.00	20%	\$68.00
Hydrocarbons, Aromatic Extractable Petroleum	\$85.00	20%	\$68.00
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60



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Invoice Date:
Invoice Number:

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671329

Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-023 Duplicate #3			\$459.60
EPH Afterscreen Soil w/o PAH			
Hydrocarbons, Aliphatic Extractable Petroleum	\$85.00	20%	\$68.00
Hydrocarbons, Aromatic Extractable Petroleum	\$85.00	20%	\$68.00
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-024 Duplicate #4			\$323.60
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-025 Duplicate #5			\$323.60
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60
B24101170-026 Duplicate #6			\$459.60
EPH Afterscreen Soil w/o PAH			
Hydrocarbons, Aliphatic Extractable Petroleum	\$85.00	20%	\$68.00
Hydrocarbons, Aromatic Extractable Petroleum	\$85.00	20%	\$68.00
Lead Scavengers-S			
EDB in soil by ECD	\$85.00	20%	\$68.00
8260-VOCs, Low Level - Short List	\$85.00	20%	\$68.00
MT EPH and VPH-Field Extracted			
Hydrocarbons, Extractable Petroleum-Scrn	\$83.00	20%	\$66.40
Percent Moisture	\$17.00	20%	\$13.60
Methanol Extraction for Volatiles SW5035	\$2.50	20%	\$2.00
Volatile Petroleum Hydrocarbons	\$132.00	20%	\$105.60

MISCELLANEOUS CHARGE SUMMARY:

Work Order: B24101170

Item	Price	QTY	Total
Sample Management/Disposal: Standard - per sample	\$3.00	26	\$78.00
			\$78.00

Comments:

Proj. Contact: Robyn Sargent

Subtotal: \$9,229.60
Misc Charges: \$78.00

INVOICE TOTAL: \$9,307.60
Amount Received: \$0.00
AMOUNT DUE: \$9,307.60



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Billings, MT 406.252.6325 • Casper, WY 307.235.0515
Gillette, WY 307.686.7175 • Helena, MT 406.442.0711

Remit To: **Energy Laboratories, Inc.**
Department 6250
PO Box 4110
Woburn, MA 01888-4110

Account Number: M1249
Invoice Number: 679833
Invoice Date: 12/20/2024
Purchase Order:
Invoice Total: \$645.40
Amount Received: \$0.00
Amount Due: \$645.40

00000M12490006798330000645405

Detach and Return Stub with Payment

Bill To: **MT Dept of Transportation**
Attn: MDT Environmental Services Bureau
PO Box 201001
Helena, MT 59620-1001

INVOICE

Invoice No.: 679833

Invoice Date: Dec 20, 2024

Purchase Order:

Account Number: M1249

Net 30

From: 
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Quote Id: N/A
Project Name: MDT WSS Maintenance Facility

Lab Number	Client Samp ID	Test Price	Rush	Discount	Price	Total
Work Order: B24111727						
B24111727-001	MW-03					\$642.40
EPH Afterscreen Water w/o PAH						
	Hydrocarbons, Aliphatic Extractable Petroleum	\$100.00		20%	\$80.00	
	Hydrocarbons, Aromatic Extractable Petroleum	\$100.00		20%	\$80.00	
Lead Scavengers - W						
	EDB in Water by ECD	\$100.00		20%	\$80.00	
	8260-Volatile Organic Compounds-Short List	\$100.00		20%	\$80.00	
Analysis Parameter						
	Alkalinity to pH 4.5	\$16.00		20%	\$12.80	
	pH	\$16.00		20%	\$12.80	
	Nitrogen, Nitrite	\$40.00		20%	\$32.00	
	Anions by Ion Chromatography	\$32.00		20%	\$25.60	
	Metals by ICP/ICPMS, Dissolved	\$32.00		20%	\$25.60	
	Nitrogen, Nitrate + Nitrite	\$32.00		20%	\$25.60	
	Hydrocarbons, Extractable Petroleum Screen	\$95.00		20%	\$76.00	
	Carbon, Dissolved Inorganic	\$70.00		20%	\$56.00	
	Headspace Gas Analysis	\$70.00		20%	\$56.00	

MISCELLANEOUS CHARGE SUMMARY:

Work Order: B24111727

Item	Price	QTY	Total
Sample Management/Disposal: Standard - per sample	\$3.00	1	\$3.00
			\$3.00



Trust our People. Trust our Data.

Comments:

Proj. Contact: Robyn Sargent

Invoice Date: 12/20/2024
Invoice Number: 679833

Subtotal: \$642.40
Misc Charges: \$3.00

INVOICE TOTAL:	\$645.40
Amount Received:	\$0.00
AMOUNT DUE:	\$645.40



February 6, 2024

Mr. Kendall Gustafson
Montana Department of Transportation
2701 Prospect Avenue
Helena, MT 59620

Re: Additional Corrective Action Work Plan Required for the Petroleum Release at the MDT White Sulphur Springs 3rd Avenue Southwest Facility, 705 3rd Avenue Southwest, White Sulphur Springs, Meagher County, Montana; Facility ID 30-12376 (TID 25004), Release 6522, Work Plan ID 34821

Dear Mr. Gustafson:

DEQ has reviewed the Abbreviated Cleanup Report Revision 1 (Report) dated December 19, 2023, prepared and submitted on your behalf by Pioneer Technical Services, Inc. for the petroleum release (Release) confirmed at the above-referenced facility (Facility). While the excavation removed most of the petroleum contaminated soil, additional investigation is required to determine the extent and magnitude of remaining petroleum contamination. Your consultant has recommended a post-excavation Remedial Investigation. DEQ agrees with your consultant's recommendation.

DEQ expects that the proposed actions in the WP will fully investigate the Release and help determine a pathway to closure.

Please have your environmental consultant submit a Remedial Investigation (RI) Work Plan to DEQ by **March 30, 2024**. Use the *Montana Remedial Investigation Guidance for Petroleum Releases (RI Guidance)* found online under the Guidance dropdown at the Petroleum Tank Cleanup Section (PTCS) webpage¹. The WP is expected to include the following scope of work:

- Include all sections in the RI Guidance. Some RI WP sections may not be applicable for the Release, or they may have been completed previously; provide justification for not including each of those sections in the WP.
- Analyze soil and groundwater samples for petroleum constituents as required by the Montana Risk-Based Corrective Action Guidance for Petroleum Releases. In addition, have groundwater samples analyzed for intrinsic biodegradation indicators and the lead scavengers 1,2-DCA and EDB.

¹ <https://deq.mt.gov/cleanupandrec/Programs/petrocleanup>

Mr. Kendall Gustafson
MDOT White Sulphur Springs 3rd Avenue Southwest Facility, White Sulphur Springs
Facility ID 30-12376, TID 25004, Release 6522
February 6, 2024

- Validate all laboratory analytical data using DEQ's Data Validation Summary Form (DVSF) found online under the Guidance dropdown at the PTCS webpage¹.
- Discuss ongoing WP tasks and results with DEQ's project manager; submit written agreed-upon WP modifications as required to complete the WP objectives.
- Prepare an updated Release Closure Plan (RCP), discuss the results with DEQ's project manager. DEQ expects the RCP to cover the Release investigation and cleanup information. Use the RCP format found online under the Guidance dropdown at the PTCS webpage¹.
- Prepare and submit RI Report detailing the results of the investigation. The Report is expected to include all the content outlined in the RI Report format and the following:
 - Append all soil boring/well logs, groundwater monitoring field forms, laboratory analytical data, completed DVSFs, and the RCP.
- Use standardized DEQ WP and Report formats found online under the Forms dropdown at the PTCS webpage¹.
- Submit WP and Reports electronically following the PTCS submittal requirements found under the Guidance dropdown at the PTCS webpage¹.

You can implement the WP after you receive DEQ's written notification that the scope of the WP has been approved.

The Petroleum Tank Release Compensation Board (PTRCB) will review and comment on the costs associated with the WP. The WP should include you list of proposed tasks with the descriptions and itemized costs for each task. PTRCB staff can advised you of their requirements for documenting costs associated with the WP tasks. Contact them at (406) 444-9710 or (800) 556-5291 or contact the specific PTRCB staff listed below.

If you have any questions, please contact me at (406) 444-0216 or by email at wbergum@mt.gov.

Sincerely,



William Bergum
Environmental Project Officer
Petroleum Tank Cleanup Section

ec: Mr. A.J. Pate, PTRCB
Mr. Sean Hill, Meagher County Sanitarian
Mr. Kendall Gustafson, Montana Department of Transportation
Mr. Jason Decker, Pioneer Technical Services

¹ <https://deq.mt.gov/cleanupandrec/Programs/petrocleanup>

Radonich, Joe

From: Gustafson, Kendall
Sent: Thursday, February 15, 2024 10:44 AM
To: Charlie Peterson; MWIGNOT@hydrometrics.com; mark@rtimt.com; Scott Vosen
Cc: Radonich, Joe
Subject: Request for proposal for Remedial Investigation Work Plan for MDT White Sulphur Springs Site
Attachments: 6522_06FEB24_WPR.pdf; Limited Solicitation Agreement.pdf; WSS_AbbCleanupReport_FINAL.pdf

Hello All,

MDT is requesting a Remedial Investigation work plan (must follow the DEQ RI WP guidance) and bids from consultants for remedial investigation activities at the MDT White Sulphur Springs site, located at 705 3rd Ave SW, White Sulphur Springs, MT 59645. These activities include the following:

- Conduct a subsurface investigation to fully delineate the extent and magnitude of remaining contamination, evaluate the vapor intrusion pathway, collect surface soil samples below the approximate area of stockpiled contaminated soil, and reporting.
- For the purpose of budgeting, assume the following:
 - 20 soil borings to a depth of 20 ft.
 - Three surface soil samples within the approximate area of the contaminated soil stockpile.
 - Complete 10, 2" monitoring wells screened from a depth of 10-30 ft.
 - Develop monitoring wells.
 - Complete a monitoring well survey.
 - Drum any excess waste soil, characterize and dispose.
 - Conduct one round of groundwater monitoring.
 - Prepare a RI Report according to DEQ RI Report guidance.
 - Complete a PTRCB Form 5 to be directly reimbursed from the PTRCB. Because the consultant will be reimbursed directly from the PTRCB, work will not begin until obligation from the PTRCB has been approved.
 - Submit on a time and materials basis.
 - Analytical paid by MDT separately.

Included in this email as attachments are the 2023 Abbreviated Cleanup report, DEQ WP Request letter and MDT Terms and Conditions.

Please submit the WP and bid by March 15, 2024.

Thanks,



Kendall Gustafson

Environmental Scientist | Environmental Services Bureau, Remediation and Assessment Section
Montana Department of Transportation
2701 Prospect Avenue
Helena, MT 59620

Cell: 406-461-2193 | kgustafson@mt.gov

Follow Us: mdt.mt.gov



March 15, 2024

Mr. William Bergum
Environmental Project Officer
Petroleum Tank Cleanup Section
Montana Department of Environmental Quality
1225 Cedar St.
Helena, MT 59601

RE: **Remedial Investigation Work Plan**
MDT White Sulphur Springs Maintenance Facility
705 3rd Avenue Southwest, White Sulphur Springs, Meagher County, Montana,
Facility ID #30-12376 (TID #25004), Release #6522, WP ID #34821

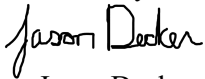
Owner/ Responsible Party	Montana Department of Transportation Mr. Kendall Gustafson 2701 Prospect Avenue Helena, MT 59620 kgustafson@mt.gov	Consultant/ Work Plan Preparer	Pioneer Technical Services, Inc. Jason Decker 1101 S. Montana St. Butte, MT 59701 jdecker@pioneer-technical.com
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Dear Mr. Bergum,

Pioneer Technical Services, Inc. is submitting this remedial investigation work plan for the Montana Department of Transportation (MDT) White Sulphur Springs Maintenance Facility on behalf of the MDT. As requested in correspondence from the Montana Department of Environmental Quality dated February 6, 2024, our scope of work and associated proposed costs are below. Figure 1 provides the location and vicinity of the subject facility, Figure 2 provides the site layout and proposed borehole locations, and Figure 3 the historical borehole locations petroleum cleanup sample locations.

If you have any questions about this project or the proposed scope of work, please call me at (406) 782-5177 or email me at jdecker@pioneer-technical.com.

Sincerely,



Jason Decker, P.E.
Senior Engineer II

Attachment 1 Figures
Attachment 2 Standard Operation Procedures
Attachment 3 Cost Estimate

cc: Kendall Gustafson, Responsible Party Representative
Charles Peterson, Pioneer Technical Services, Inc.

1 FACILITY HISTORY AND RELEASE BACKGROUND

Section 1 details the history, background, contact information, petroleum release information, initial petroleum cleanup actions, and other relevant information related to the Montana Department of Transportation (MDT) White Sulphur Springs Maintenance Facility (Site).

1.1 Contact Information

Table 1 provides the relevant contact information for the Site.

Table 1. List of Contacts

<p>Owner/Operator/ Responsible Party</p>	<p>Montana Department of Transportation Mr. Kendall Gustafson Environmental Scientist Environmental Services Bureau, Remediation and Assessment Section 2701 Prospect Avenue Helena, MT 59620 406-461-2193 kgustafson@mt.gov</p>	
<p>DEQ Contact Person</p>	<p>Montana Department of Environmental Quality Mr. William Bergum Environmental Project Officer Petroleum Tank Cleanup Section P.O. Box 200901 Helena, MT 59620 406-444-0216 wbergum@mt.gov</p>	
<p>Work Plan Preparation</p>	<p>Pioneer Technical Services, Inc. Jason Decker, P.E. Senior Engineer II 1101 S. Montana Street Butte, MT 59701 406-782-5177 jdecker@pioneer-technical.com</p>	<p>Pioneer Technical Services, Inc. Charles L. Peterson, P.G. Senior Project Manager 2310 Broadwater Ave, Suite 1 Billings, MT 59102 406-702-2430 cpeterson@pioneer-technical.com</p>

1.2 Facility History

The project Site is located at the intersection of 3rd Avenue Southwest and Southwest Garfield Street in White Sulphur Springs, Montana. The Site is located within a predominantly residential and light commercial area and is fairly level with an elevation of approximately 5,040 feet above mean sea level. The Site is a rectangular shaped parcel and is bordered by 3rd Avenue Southwest to the east, East Garfield Street to the south, 5th Avenue Southwest to the west, and Southwest Hancock Street to the south. This area of White Sulphur Springs is served by public utility city

services (e.g., potable water, sanitary sewer, and storm sewer systems). The Site historically operated and currently operates as an MDT maintenance facility.

Prior to April 2023, the Site included the former MDT maintenance building situated near the southwest and east-central portion of the property, and consisted of a one-story, slab-on-grade, block and brick building with garage bays, office space and maintenance areas. In April 2023, redevelopment of the Site started and included removal and replacement of the former MDT maintenance building with a new MDT maintenance building. Prior to the construction activities, a subsurface geotechnical soil investigation was performed at the facility and a petroleum release was discovered. It appears that the release occurred from a former underground storage tank (UST) basin that was located at the southeast corner of the facility. Figure 1 in Attachment 1 provides the Site location, Figure 2 provides the general Site layout along with proposed borehole locations, and Figure 3 provides the historical borehole locations and petroleum spill cleanup sample locations.

1.3 Release Background

On October 7, 2022, petroleum hydrocarbon-impacted soil was encountered in the subsurface soil near the southwest corner of the former MDT maintenance building during a geotechnical investigation at the facility. The investigation was being performed by Pioneer Technical Services, Inc. (Pioneer) under contract to Slate Architecture. In response to the discovery of the petroleum impact, Pioneer was further retained by Slate Architecture to perform an additional Site Investigation to determine the magnitude and extent of the petroleum impact near the southern and southeastern portions of the Site.

Pioneer completed the additional Site Assessment between February 16 and 17, 2023, which included the advancement of 15 soil borings (SB-1 through SB-15) to depths ranging from 10 to 15 feet below ground surface (bgs), soil sample collection, and analytical laboratory testing. Following the field work, Pioneer prepared a Site Assessment Report detailing the Site Assessment (Pioneer, 2023a). Results of the Site Assessment indicated that subsurface soil located near and around the south and southeastern corner of the former maintenance building were impacted with highly weathered gasoline. A review of a historical plat map of the facility, provided by MDT Environmental Services, indicates that the most likely source of the gasoline release is the former underground gasoline tank and dispenser island that was located just east of the southeast corner of the former maintenance building. Based upon the soil sample and field screening results, the impact appeared to be present from 1 to 12 feet bgs. The impact likely extends deeper than 12 feet in the former UST basin, but the drilling program scope of work was limited to a total depth of 15 feet and focused on the areas adjacent to the former maintenance building.

Petroleum impacted soil cleanup activities were completed May through June 2023 at Site. The objective of the cleanup activities was to further define the extent and magnitude of petroleum impacts in soil and determine and address its potential impact to the former MDT maintenance

building demolition work and most importantly to limit its impact to the new MDT maintenance building during and after construction.

On May 24, 2023, following petroleum-impacted soil removal, a Pioneer geologist or engineer collected 18 confirmation and characterization soil samples from the base and sidewalls of the excavation area and the stockpiled soil. All the volatile petroleum hydrocarbon (VPH) and extractable petroleum hydrocarbon (EPH) constituents for the confirmation samples were below their respective Montana Department of Environmental Quality (DEQ) Risk-Based Screening Level (RBSL) for Direct Contact (Commercial 2 to 10 feet) and Leaching (0 to 10 feet to groundwater). Two of the four characterization samples from the east and south wall had constituent concentrations above the DEQ RBSL Direct Contact (Commercial 2 to 10 feet) and/or DEQ RBSL Leaching (0 to 10 feet to groundwater). The sample along the south wall approximately 25 feet west of the southwest corner had concentrations of C9 to C10 Aromatics (172 milligrams per kilogram [mg/kg]) and C11 to C22 Aromatics (1,290 mg/kg) above the DEQ RBSL Leaching (0 to 10 feet to groundwater); and concentrations of C9 to C18 Aliphatics (3,540 mg/kg) above the DEQ RBSL Direct Contact (Commercial 2 to 10 feet). The sample along the south wall approximately 60 feet west of the southeast corner had concentrations of naphthalene (19 mg/kg) above the DEQ RBSL Direct Contact (Commercial 2 to 10 feet) and DEQ RBSL Leaching (0 to 10 feet to groundwater); concentrations of C9 to C10 Aromatics (379 mg/kg) and C11 to C22 Aromatics (2,100 mg/kg) above the DEQ RBSL Direct Contact (Commercial 2 to 10 feet); and concentrations of C9 to C12 Aliphatics (527 mg/kg) and C9 to C18 Aliphatics (3,620 mg/kg) above the DEQ RBSL Leaching (0 to 10 feet to groundwater). All other EPH and VPH constituents for the four characterization samples were below their respective DEQ RBSLs. The stockpile sample collected to characterize the stockpiled soil for disposal had concentrations of C9 to C10 Aromatics (209 mg/kg) and C11 to C22 Aromatics (1,330 mg/kg) above the DEQ RBSL Leaching (0 to 10 feet to groundwater); and concentrations of C9 to C18 Aliphatics (2,140 mg/kg) above DEQ RBSL Direct Contact (Commercial 2 to 10 feet). All other EPH and all VPH constituents for the stockpile sample were below their respective DEQ RBSLs. The stockpile characterization sample also had non-detect constituent concentrations for toxicity characteristic leaching procedure Metals.

Results of the assessment and cleanup activities indicated that petroleum-impacted soil within the new building footprint had been successfully removed, however, some residual petroleum impacted soil remains to the south and west of the new building footprint location. Based on the findings and conclusions of the Cleanup Report (Pioneer, 2023b), Pioneer recommended a post-removal remedial investigation (RI) be performed to further define the extent and magnitude of the remaining petroleum-impacted media (soil and groundwater). The investigation would be designed to define petroleum-impacts to soil and groundwater south and east of the petroleum-impacted soil removal area through soil borings, soil sampling, groundwater monitoring well installation and development, and groundwater monitoring.

2 SUMMARY OF FACILITY CONDITIONS

The purpose of the cleanup activities conducted at the Site in 2023 was to determine the extent of the petroleum-impacted soil in the vicinity of the new building and remove it from within the footprint of the newly proposed MDT Maintenance Facility. The second objective was to determine the effectiveness of the cleanup which was accomplished by conducting soil field screening and collecting soil confirmation samples for analytical testing following completion of removal activities.

The general location and depth of the soil removal was determined in the field based on field observations and soil screening results. During soil removal, a Pioneer geologist or engineer was present to direct the soil removal, observe conditions, screen soils, and collect soil samples for analytical testing. Soil removal progressed from the southeast corner of the new building footprint to the north, west, and northwest, until field observations and screening results indicated petroleum-impacted soil removal was adequate. Typically, the soil excavation was advanced to depths of 8 to 12 feet bgs.

Results of the assessment and cleanup activities indicated that petroleum-impacted soil within the new building footprint have been successfully removed, however, some residual petroleum impacted soil remains to the south and west of the new building footprint location.

3 REMEDIAL INVESTIGATION WORK PLAN TASKS

The scope of work will include installing 20 soil borings to a depth of 30 feet bgs; collecting soil samples from each soil boring for laboratory analysis; constructing 10 2-inch diameter groundwater monitoring wells; developing, surveying, and monitoring the newly installed monitoring wells; and collecting confirmation surface soil samples within the footprint of the petroleum-impacted soil stockpile area. The scope of work will be conducted to define the extent and magnitude of petroleum impacts at the Site post remedial excavation. The work will include the following tasks:

- Task 1 – Project Management and Planning.
- Task 2 – Soil Boring and Well Installation Activities.
- Task 3 – Groundwater Monitoring.
- Task 4 – Stockpile Area Soil Confirmation Sampling.
- Task 5 – Petroleum Vapor Intrusion Desktop Analysis.
- Task 6 – Reporting.

3.1 Task 1 – Project Management and Planning

Task 1 includes managing, scheduling, organizing, and planning the work, including the activities below:

- Coordinate Site work.
- Preparing this Work Plan.
- Scheduling personnel.
- Securing access agreements and encroachment permits, as necessary.
- Coordinating activities of owners, regulators, and analytical testing laboratory.
- Preparing a Job Risk Assessment (JRA) to complete the work.
- Verifying utility location and documentation prior to Site work.
- Conducting planning meetings with owner and DEQ project manager as deemed necessary by DEQ project manager.

We will prepare a JRA to document a safety plan and complete the work as approved by the Montana DEQ.

Related to scheduling, we will manage, schedule, and supervise all work to make sure it is completed as proposed and in a timely manner.

3.2 Task 2 – Soil Boring and Well Installation Activities

The work includes drilling 20 soil borings at the facility and constructing 10 borings into 2-inch diameter groundwater monitoring wells. The soil borings and monitoring wells will be installed in locations that best define the extent and magnitude of the remaining petroleum impacts in and downgradient of the source area and will be based on historical soil boring and soil excavation data. The anticipated total depth of the borings is 30 to 35 feet bgs. This is based on average groundwater at 32 feet bgs according to the Groundwater Information Center database (MBMG, 2024). We will advance the soil boings using Pioneer’s direct-push Geoprobe® drill rig and associated equipment to conduct the soil investigation. Using direct-push drill technology will minimize Site disturbance and minimize the amount of investigation derived waste (cuttings). Figure 2 shows the 20 proposed borehole locations, and final borehole locations will be determined in the field after consultation with the MDT and DEQ project managers and based on accessibility, underground utilities, the presence of unforeseen impedances, or other factors.

Pioneer will install 10 borings into 2-inch diameter groundwater monitoring wells based on the findings in the 20 soil borings and consultation with the MDT and DEQ project managers. Figure 2 provides Pioneer’s 10 proposed monitoring well locations. For the groundwater monitoring well installation phase, the team will use the Geoprobe® unit to construct the wells. The monitoring wells will be constructed with 2-inch diameter, schedule 40 polyvinyl chloride (PVC) pipe. All well screens and piping will be delivered to the Site factory wrapped. Each well will be constructed using a prepack well screen consisting of 0.010-inch, factory-slotted PVC screen

covered with a 65-mesh stainless steel screen and filled with 20/40 mesh silica sand. The wells will be screened from 10 to 30 feet bgs. The remainder of the borehole will be completed with PVC riser pipe to grade. The annular space between the prepack well screen and the borehole will have 0.10 to 0.20-inch sand completion to 2 feet above the screen, whereas the remaining annulus space between the well casing and the borehole will have a bentonite seal. The wells will be secured with bolt-down covers set in concrete. The wells will be developed after construction. Initial turbidity will be recorded immediately prior to starting development, and final turbidity will be recorded immediately following completion of well development. Each well will be considered developed once clear of sediment, or the well has been pumped with a submersible pump or trash pump for 1 hour. Following well installation and development, the new wells will be surveyed by a licensed surveyor and the top of casings will be determined to be within 0.01 feet of mean sea level.

A Pioneer engineer or geologist will supervise drilling operations and be present to collect, screen, and log soil types. Soil samples will be collected at continuous intervals and personnel will log the soil type, consistencies, and will document any visible signs of petroleum impacts. Standard headspace readings will be collected using a photoionization (PID) meter. A portion of each soil sample will be placed into an airtight container, labeled, and allowed sufficient time for the hydrocarbons, if present, to volatilize. After the equilibration period, each sample will be scanned with a PID meter by inserting the sampling probe into the headspace of the container. The PID readings from each soil sample collected from each borehole will be reviewed and recorded. The sample with the highest reading, or with other signs indicating petroleum impacts, will be selected for laboratory analysis. The sample collected closest to the water table at the time of drilling will also be submitted for analysis. A maximum of three samples from each boring will be submitted for laboratory analysis. The selected samples will be placed into a laboratory-supplied container, labeled, stored on ice, and submitted to Energy Laboratories, Inc. (Energy) in Helena, Montana, for VPH and EPH screen analyses. If the EPH screen result is greater than 200 mg/kg, the sample will be submitted for EPH fractionation analysis. For this RI Work Plan, we are assuming that half of the samples will require EPH fractionation. Chain of custody documentation will accompany the samples.

3.3 Task 3 – Groundwater Monitoring

Pioneer personnel will collect groundwater samples from the 10 newly installed monitoring wells during one monitoring event. For the event, we will gauge and purge the wells and collect groundwater samples. The monitoring event will occur in mid to late summer.

Prior to groundwater sample collection, we will gauge each of the 10 new monitoring wells for the presence of light non-aqueous phase liquid (LNAPL). Each well will be gauged using an electronic interface probe capable of detecting water or LNAPL hydrocarbons to within 0.01 feet. If the well does not contain LNAPL, the team will collect groundwater samples. If LNAPL is detected, the team will not collect any samples from wells containing LNAPL, will note the conditions in a logbook, and notify the DEQ project manager.

The groundwater samples will be collected in accordance with low-flow sample techniques. To ensure representative groundwater samples are collected, we will monitor the water quality parameters for the following intrinsic bioremediation indicators and allow them to stabilize during the purging process prior to sample collection: temperature (plus or minus 3%), pH (equal or less than 0.1), dissolved oxygen (plus or minus 10%), specific conductivity (plus or minus 3%), oxidation reduction potential (plus or minus 10 millivolts), and turbidity (plus or minus 10%). To complete groundwater sampling in accordance with DEQ's low-flow sampling guidance, the wells will be gauged at each field parameter monitoring interval with a water level meter to ensure that excessive drawdown (plus or minus 0.3 foot) does not occur prior to sampling.

We will collect the groundwater samples with a peristaltic or submersible bladder pump and disposable tubing and transfer the samples to the appropriate laboratory containers. New, decontaminated containers will be supplied by the laboratory prior to sample collection. Groundwater samples will be submitted for laboratory analysis of VPH and EPH screen analyses. We will collect one field duplicate during each sample event. Each sample container will be preserved as directed by the laboratory, labeled, and packaged on ice. The samples will be delivered to Energy. For this RI Work Plan, we are assuming that half of the samples will require EPH fractionation. Chain of custody documentation will accompany the samples.

Purge water generated during the sampling activities will be infiltrated into the grassy areas available at the Site in accordance with Montana DEQ standards.

3.4 Task 4 – Stockpile Area Soil Confirmation Sampling

A Pioneer engineer or geologist will be present to collect confirmation soil samples from the petroleum-impacted stockpile area. Confirmation soil samples will be collected at the surface to verify all petroleum-impacted soils have been removed from the stockpile area. Personnel will collect one 5-point composite for EPH screen analysis, and if the EPH screen result is greater than 200 mg/kg, the sample will be submitted for EPH fractionation analysis. Field personnel will also collect two discrete soil samples for VPH analysis. Standard headspace readings will be collected using a PID meter. A portion of each soil sample will be placed into an airtight container, labeled, and allowed sufficient time for the hydrocarbons, if present, to volatilize. After the equilibration period, each sample will be scanned with a PID meter by inserting the sampling probe into the headspace of the container. The PID readings from each soil sample collected from stockpile area will be reviewed and recorded. A maximum of one composite sample and two discrete samples from the stockpile area will be submitted for laboratory analysis. The selected samples will be placed into a laboratory-supplied container, labeled, stored on ice, and submitted to Energy. For this RI Work Plan, we are assuming that no samples from the stockpile area will require EPH fractionation. Chain of custody documentation will accompany the samples.

3.5 Task 5 – Petroleum Vapor Intrusion Desktop Analysis

Task 5 will include a desktop evaluation of possible petroleum vapor intrusion that may pose threats to human health or safety. Completion of the scope of work included in this work plan is to carefully evaluate the available information to determine whether the site poses any threat to human health, safety, or to the environment due to petroleum vapors. Threats include but are not limited to impacts to water wells; impacting indoor air within the on-Site buildings or adjacent land; impacts to any surface waterbody; and potential impacts to human health and the environment. If any imminent threats are identified, DEQ will be notified immediately. Results from the desktop risk evaluation will be summarized in the remedial investigation report (RIR). The report will identify the media assessed, the route of exposure or pathway, the receptor or exposure point, specific information or data examined, the methods used to estimate the exposure pathway, and provide a rationale for the conclusions, and the method and data used. The risk evaluation will be clearly and concisely documented in a report and submitted to DEQ for review.

3.6 Task 6 – Reporting

Remedial Investigation Report (RIR) and Release Closure Plan (RCP). Pioneer will prepare and submit a RIR and RCP in accordance with *Montana Remedial Investigation Report Work Plan and Report Guidance for Petroleum Releases* (DEQ, 2021). The RIR will detail the method and results of the groundwater monitoring event completed under this work plan along with the soil boring activities; well installation, development, and survey; and stockpile area soil confirmation sampling. The report will follow the Montana DEQ report format and include the following:

- Updated facility maps illustrating locations of utilities, former fuel systems, Site buildings, locations of petroleum source material areas, receptors including underground utilities, locations of groundwater monitoring wells, and potentiometric surface maps.
- Tables summarizing field data and cumulative laboratory analytical data for soil and groundwater water samples.
- Laboratory analytical reports for the soil and groundwater samples.
- Field sample data sheets and related field data.
- Data interpretation and recommendations relevant for further remediation and/or closure plan for the release.
- Data validation documentation using DEQ Data Validation Summary Forms.
- A completed RCP.

4 RECEPTOR SURVEY

The work plan request does not require a receptor survey.

STANDARD OPERATING PROCEDURES

Attachment 2 provides the Pioneer Standard Operating Procedures applicable to the scope of work.

COST ESTIMATES

Attachment 3 provides the cost estimate to perform this scope of work.

SCHEDULE

We can begin work on this project within 30 days following receipt of Montana DEQ approval, which is expected sometime in early spring 2024. The RI field activities are expected to be completed in late spring (May 2024) or early summer (June 2024) with the monitoring event occurring in mid-summer (August 2024) to late summer (September 2024). The project as described in this work plan will last up to 12 months. Therefore, the final report will be issued 45 days after the fall 2024 sample event, in November or December 2024.

REFERENCES

DEQ, 2021. Montana Remedial Investigation Report Work Plan and Report Guidance for Petroleum Releases. March 2021.

MBMG, 2024. Groundwater Information Center. [Montana's Ground Water Information Center 2024 \(mtech.edu\)](https://mtech.edu). 2024.

Pioneer, 2023a. Environmental Site Assessment Report – Soil Boring and Soil Sampling, MDT Maintenance Facility, 3rd Avenue and Garfield Street, White Sulphur Springs, MT 59645. March 17, 2023.

Pioneer, 2023b. Abbreviated Cleanup Report Revision 1, Montana Department of Transportation White Sulphur Springs Maintenance Facility, 705 3rd Avenue Southwest, White Sulphur Springs, Meagher County, Montana, Facility ID #30-12376, Release #6522. December 19, 2023.

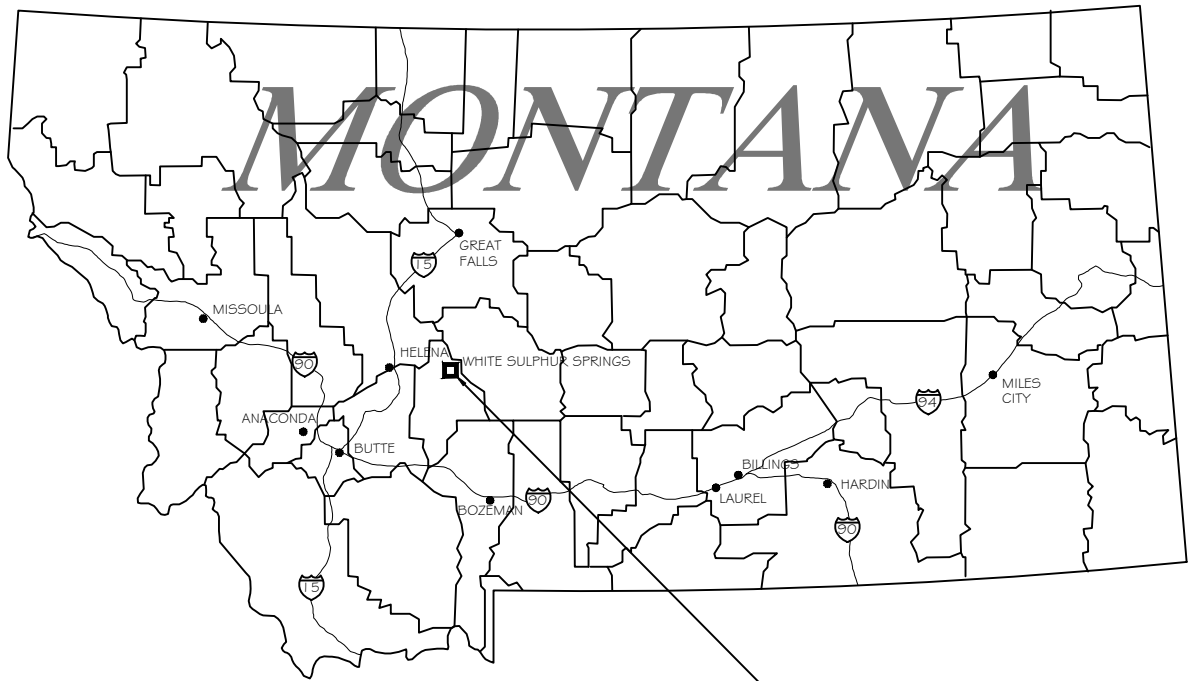
Attachment 1

Figures

Figure 1: Location and Vicinity Map

Figure 2: Proposed Borehole Locations Site Map

Figure 3: Historical Boreholes and Petroleum Cleanup Sample Locations Site Map

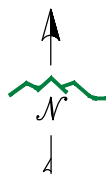


**PROJECT
LOCATION**



SITE VICINITY MAP

SITE: MDT WHITE SULPHUR
SPRINGS MAINTENANCE FACILITY
WHITE SULPHUR SPRINGS, MT
FID #: 30-12376
RELEASE #: 6522



DISPLAYED AS: _____
COORD SYS/ZONE: MSP
DATUM: NA
UNITS: INTL FT
SOURCE: PIONEER/BING

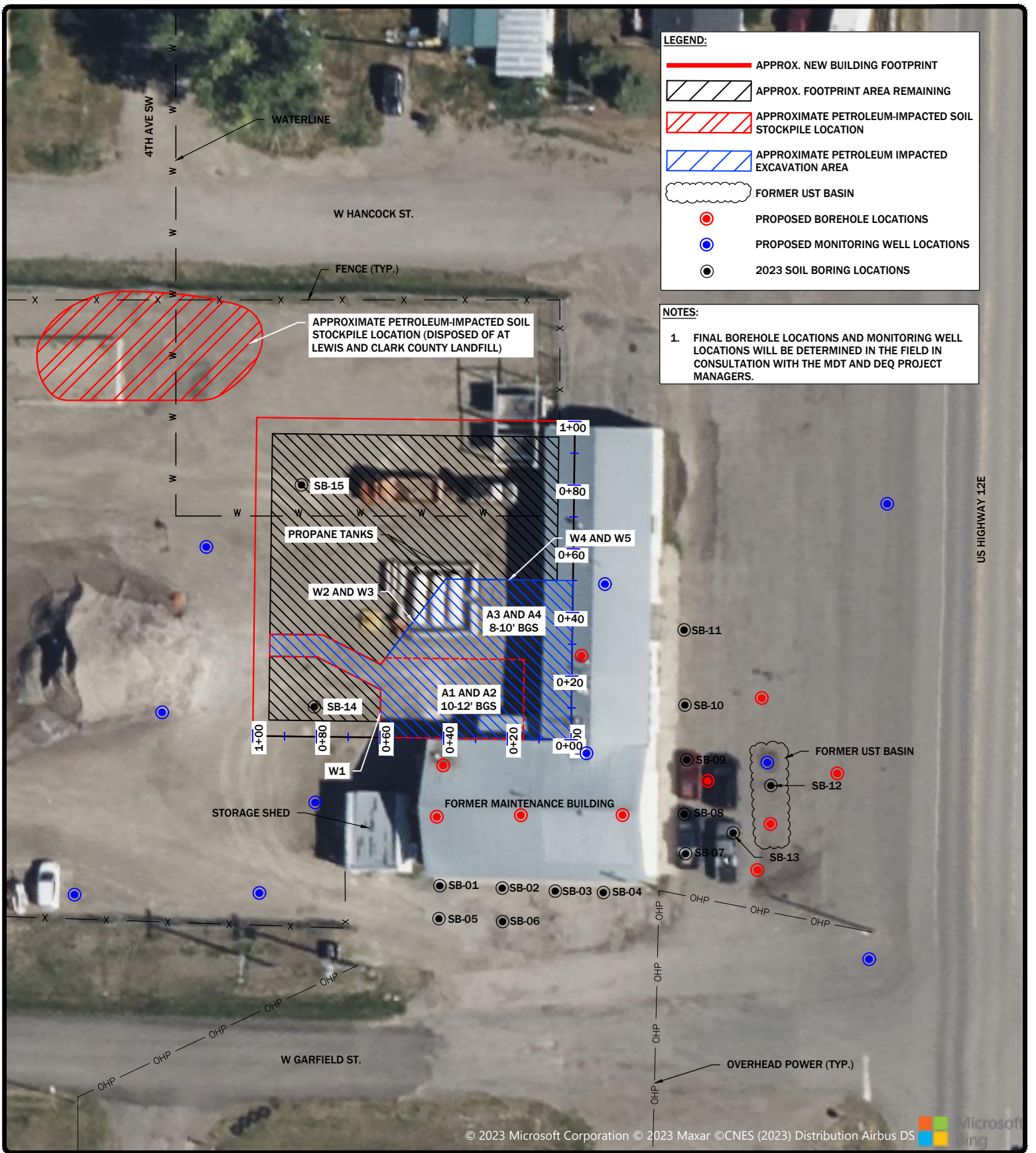
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0 1000 2000

FIGURE 1

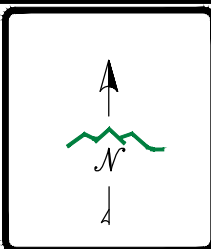


**LOCATION AND
SITE VICINITY MAP
MDT WHITE
SULPHUR SPRINGS
MAINTENANCE
FACILITY**

DATE: 03/2024



SITE: MDT WHITE SULPHUR SPRINGS MAINTENANCE FACILITY
 WHITE SULPHUR SPRINGS, MT
 FID #: 30-12376
 RELEASE #: 6522



DISPLAYED AS: _____
 COORD SYS/ZONE: MSP
 DATUM: NA
 UNITS: INTL FT
 SOURCE: PIONEER/BING

SCALE IN FEET
 0 20 40

FIGURE 2

PROPOSED BOREHOLE AND MONITORING WELL LOCATIONS SITE MAP

www.pioneer-technical.com
 (406) 782-5177

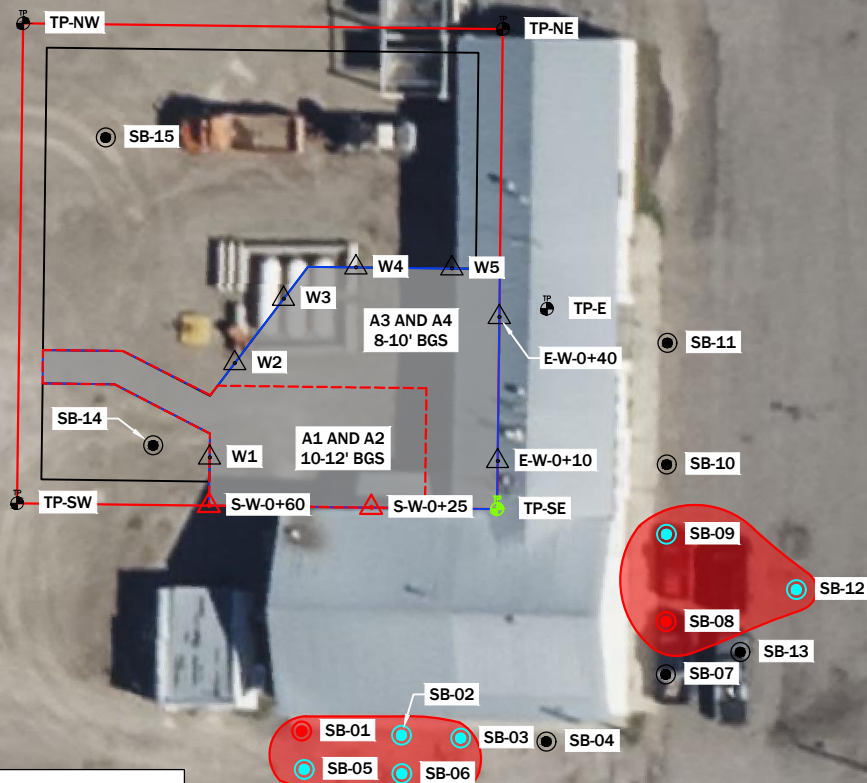
DATE: 03/2024

110

NOTES:

1. TEST PIT, BOREHOLE, AND CONFIRMATION LOCATIONS WITH BLACK COLORING HAVE NO RBSL EXCEEDANCES.
2. TEST PIT, BOREHOLE, AND CONFIRMATION LOCATIONS WITH RED COLORING EXCEED DIRECT CONTACT (COMMERCIAL 0-2') AND LEACHING (0-10' TO GROUNDWATER) RBSLs.
3. TEST PIT, BOREHOLE, AND CONFIRMATION LOCATIONS WITH BLUE COLORING EXCEED LEACHING (0-10' TO GROUNDWATER) RBSLs.
4. TEST PIT, BOREHOLE, AND CONFIRMATION LOCATIONS WITH GREEN COLORING EXCEED DIRECT CONTACT (COMMERCIAL 0-2') RBSLs.

APPROXIMATE PETROLEUM-IMPACTED SOIL STOCKPILE LOCATION (DISPOSED OF AT LEWIS AND CLARK COUNTY LANDFILL) EXCEEDS DIRECT CONTACT (COMMERCIAL 0-2') AND LEACHING (0-10' TO GROUNDWATER) RBSLs

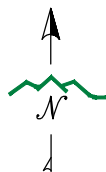


LEGEND:

- APPROX. NEW BUILDING FOOTPRINT
- APPROXIMATE PETROLEUM IMPACTED EXCAVATION AREA (NO RBSL EXCEEDANCES)
- A1 AND A2 10-12' BGS
- SAMPLE LOCATION AND SAMPLE DEPTH
- TEST PIT LOCATION, SEE NOTES 1, 2, 3, AND 4
- BOREHOLE LOCATION, SEE NOTES 1, 2, 3, AND 4
- CONFIRMATION SAMPLE LOCATION, SEE NOTES 1, 2, 3, AND 4
- RBSL EXCEEDANCE

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SITE: MDT WHITE SULPHUR SPRINGS MAINTENANCE FACILITY
 WHITE SULPHUR SPRINGS, MT
 FIG #: 30-12376
 RELEASE #: 6522



DISPLAYED AS:
 COORD SYS/ZONE: MSP
 DATUM: NA
 UNITS: INTL FT
 SOURCE: PIONEER/BING



FIGURE 3



HISTORICAL BOREHOLES AND PETROLEUM CLEANUP SAMPLE LOCATIONS

DATE: 03/2024

Attachment 3 Cost Estimate

Remedial Investigation Cost Estimate
Groundwater Monitoring Tool Cost Estimate



**Project Site: MDT White Sulphur Springs Maintenance Facility
705 3rd Avenue Southwest
White Sulphur Springs, Montana**

Pioneer Technical Services, Inc.
1101 S. Montana St., Butte, MT 59701
Preparer: Jason Decker

Facility ID 30-12376
Release 6522
Work Plan 34821

Remedial Investigation Cost Estimate

Task	Description	Quantity	Units	Unit Cost	Total Cost
1	Work Plan Preparation (Remedial Investigation)				
	Project Manager	2	Hours	\$164.00	\$328.00
	Staff Engineer	4	Hours	\$142.00	\$568.00
	Technical Editor	2	Hours	\$142.00	\$284.00
	CAD Specialist	2	Hours	\$123.00	\$246.00
				Subtotal:	\$1,426.00
2	Project Management				
	Senior Manager	4	Hours	\$184.75	\$739.00
	Project Manager	16	Hours	\$164.00	\$2,624.00
				Subtotal:	\$3,363.00
3	Mobilization				
	Geoprobe	360	Miles	\$6.20	\$2,232.00
	Survey	160	Miles	\$6.46	\$1,033.80
	Soil Boring & Well Installation Oversight / Soil Sample Delivery	280	Miles	\$3.75	\$1,049.44
				Subtotal:	\$4,315.24
4	Soil Boring Advancement				
	Soil Boring Advancement	600	feet	\$11.67	\$7,000.00
	Soil Boring Consumables (Liners, Bentonite, etc)	1	LS	\$1,248.00	\$1,248.00
				Subtotal:	\$8,248.00
5	Well Installation				
	Well Installation	300	feet	\$14.00	\$4,200.00
	Well Installation Consumables (bentonite, silica sand, expandable point)	1	LS	\$980.00	\$980.00
	Well Installation Equipment (risers, screens, flushmount cover, bottom/top caps)	1	LS	\$6,360.00	\$6,360.00
				Subtotal:	\$11,540.00
6	Well Installation, Soil Boring Oversight, Well Development, Stockpile Confirmation Sampling				
	Soil Boring Oversight and Soil Sampling	25	Hours	\$142.00	\$3,550.00
	Well Installation Oversight	15	Hours	\$142.00	\$2,130.00
	Stockpile Confirmation Sampling	2	Hours	\$142.00	\$284.00
	Well Development	10	Well	\$150.00	\$1,500.00
				Subtotal:	\$7,464.00
7	Well Survey				
	2 Man Survey Crew with Land Surveyor	4	Hours	\$253.00	\$1,012.00
	RTK GNSS	1	Day	\$300.00	\$300.00
				Subtotal:	\$1,312.00
8	Petroleum Vapor Intrusion Desktop Analysis				
	Project Manager	2	Hours	\$164.00	\$328.00
	Staff Engineer	6	Hours	\$142.00	\$852.00
				Subtotal:	\$1,180.00
9	Lodging/Per-Diem				
	Geoprobe Crew Per-Diem	10	Day	\$33.50	\$335.00
	Geoprobe Crew Lodging	8	Night	\$125.00	\$1,000.00
	Survey Crew Per-Diem	2	Day	\$33.50	\$67.00
	Well Install/Soil Boring Oversight Per-Diem	5	Day	\$33.50	\$167.50
	Well Install/Soil Boring Oversight Lodging	4	Night	\$125.00	\$500.00
				Subtotal:	\$2,069.50
10	Equipment				
	PID Meter	25	Hours	\$17.50	\$437.50
	Concrete Saw	2	Day	\$100.00	\$200.00
				Subtotal:	\$637.50
11	Release Closure Plan (Create)				
	Project Manager	2	Hours	\$164.00	\$328.00
	Staff Engineer	8	Hours	\$142.00	\$1,136.00
				Subtotal:	\$1,464.00
12	Remedial Investigation Report				
	Project Manager	4	Hours	\$164.00	\$656.00
	Staff Engineer	20	Hours	\$142.00	\$2,840.00
	Data Validation	4	Hours	\$142.00	\$568.00
	Technical Editor	3	Hours	\$142.00	\$426.00
	CAD Specialist	4	Hours	\$123.00	\$492.00
				Subtotal:	\$4,982.00
				Groundwater Monitoring Subtotal:	\$8,148.00
				Remedial Investigation Subtotal:	\$48,001.24
				Work Plan Total:	\$56,149.24



Petroleum Tank Release Compensation Board

STATE OF MONTANA

P.O. Box 200902 • Helena, MT 59620-0902 • (406) 444-9710

Groundwater Monitoring and Sampling Unit Cost Worksheet

7/28/2022

Cost Estimate Expl.

Work Plan Tasks

Unit Cost Worksheet

Help

Contractor Information

Company Name:	Pioneer Technical Services, Inc.
Address:	1101 S. Montana St.
City, State, Zip:	Butte, MT 59701
Cost Estimator/Print Name:	Jason Decker
Signature:	

Phone:	4067825177
Date:	3/5/2024

Project Information

Site Name:	MDT White Sulphur Springs Maintenance Facility
Address:	705 3rd Avenue Southwest
City:	White Sulphur Springs

Facility ID#	30-12376
Release #	6522
WP ID#	34821
Treads ID#	25004



Petroleum Tank Release Compensation Board

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7/28/2022

Groundwater Monitoring and Sampling Summary Sheet

Cost Estimate Expl.

Work Plan Tasks

Unit Cost Worksheet

Help

Monitoring Well Details

10	Total Number of Wells at Site
	Number of Fluid Level Measurements Only ⁽²⁾
10	Number of Wells to be Monitored/Sampled ⁽⁴⁻¹¹⁾
2	Average Well Casing Diameter (inches)
25	Average Depth to Groundwater (ft)
30	Average Depth of Wells (ft)

Sampling Method

<input checked="" type="checkbox"/>	Low-Flow
<input checked="" type="checkbox"/>	Low Yield Aquifer
<input type="checkbox"/>	No Purge
<input type="checkbox"/>	Other (please specify)

of Events - Monitoring/Sampling Interval

Estimated Start Date: 6/1/2024

	Semi-Annual
1	Annual
	Bi-Annual
	Other

Sampling Instrument

<input type="checkbox"/>	Peristaltic Pump
<input checked="" type="checkbox"/>	Bladder Pump
<input type="checkbox"/>	Submersible Pump
<input type="checkbox"/>	Bailer
<input type="checkbox"/>	Other (please specify)

1 Total Events

0	< 25 ft total depth
10	25 - 50 ft total depth
	50 - 75 ft total depth
	75 - 100 ft total depth

10 Total



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Task	Events												Totals		
	1		2		3		4		5		6		Units	Unit Cost	Total Cost
	Units	Unit Cost	Units	Unit Cost	Units	Unit Cost	Units	Unit Cost	Units	Unit Cost	Units	Unit Cost			
Sampling Frequency	Annual														
Work Plan Type	AC-07														
Work Plan Preparation	8	\$142.00											8	\$142.00 /work plan	\$1,136.00
Project Management	8	\$164.00											8	\$164.00 /hr	\$1,312.00
Mobilization/Demobilization (1)	280	\$3.04											280	\$3.04 /mile	\$852.00
Field Work															
Fluid Level Measurements (2)														/well	
Groundwater Monitoring Setup (3)	2	\$142.00											2	\$142.00 /day	\$284.00
Groundwater Monitoring (<25ft total depth) - Peristaltic (4)														/well	
Groundwater Monitoring (<25ft total depth) - Bladder (5)														/well	
Groundwater Monitoring (25-50ft total depth) - Bladder (5)	10	\$177.50											10	\$177.50 /well	\$1,775.00
Groundwater Monitoring (50-75ft total depth) - Bladder (5)														/well	
Groundwater Monitoring (75-100ft total depth) - Bladder (5)														/well	
Groundwater Monitoring - No Purge (6)														/well	
Modifiers															
Groundwater Monitoring - Low Yield Modifier (7)	5	\$71.00											5	\$71.00 /well	\$355.00
Groundwater Monitoring - IBI Modifier (8)														/well	
Groundwater Monitoring - Filters (9)														/filter/well	
Contaminated Purge Water - Offsite Disposal (10)														/each	
Duplicate Sample Modifier (11)	1	\$142.00											1	\$142.00 /each	\$142.00
Other Services															
Other Service (please specify)														/each	
Other Service (please specify)														/each	
Lodging & Per Diem (Lodging - actual only)															
Lodging: # of people	1	\$125.00											1	\$125.00 /night	\$125.00
Food: # of people	2	\$33.50											2	\$33.50 /day	\$67.00
(Breakfast \$8.25, Lunch \$9.25, Dinner \$16.00)															
Laboratory Analysis (12)	Annual														
Volatile Petroleum Hydrocarbons (VPH)	0	\$132.00	10										10	/sample	
Extractable Petroleum Hydrocarbons (EPH)															
EPH "screen"	0	\$83.00	10										10	/sample	
EPH "fractions"	0	\$170.00	5										5	/sample	
Polycyclic Aromatic Hydrocarbons (PAHs)														/sample	
Lead Scavengers															
Ethylene dibromide (EDB)														/sample	
1,2-Dichloroethane (DCA)														/sample	
Drinking Water - EPA 524.2														/sample	
Intrinsic Biological Indicator Analyses (IBI)														/sample	
Other Analytical Methods														/sample	
Other Service (please specify)														/each	
PTRCB sampling fee (13) (\$10.00 allowed)	10	\$10.00											10	\$10.00 /sample	\$100.00
Report Preparation															
Groundwater Monitoring Report - Type (14-15)	Interim Data Submittal														
Groundwater Monitoring Report - Base Cost (14)	1	\$1,000.00											1	\$1,000.00 /report	\$1,000.00
IBI Modifier (16)														/event	
Additional Wells Modifier (17)														/event	
Release Closure Plan (RCP) Preparation (18)															
Create RCP	1	\$1,000.00											1	\$1,000.00 /RCP-C	\$1,000.00
Update RCP														/RCP-U	
														Monitoring & Sampling Subtotal:	\$8,148.00

Additional Conditions/Comments/Costs:

Laboratory fees will be direct billed to MDT. Units and costs are shown as a place holder and are not included in the total cost

Mobilization cost includes sample delivery to Helena, MT for return trip

														Additional Costs Subtotal:	
														Grand Total:	\$8,148.00

If you require assistance, call 406-444-9710
 Submit completed form with your Work Plan
 Provide written comments to:
 Petroleum Tank Release Compensation Board
 PO Box 200902, Helena MT 59620-0902



Petroleum Tank Release Compensation Board

STATE OF MONTANA

P.O. Box 200902 • Helena, MT 59620-0902 • (406) 444-9710

Cost Estimate Expl.

Work Plan Task List

Unit Cost Worksheet

Site Information

Help

Task	Total Cost
Work Plan Preparation	\$1,136.00
Project Management	\$1,312.00
Mobilization/Demobilization ⁽¹⁾	\$852.00
Fluid Level Measurements ⁽²⁾	\$0.00
Groundwater Monitoring ⁽⁴⁻⁶⁾	\$2,059.00
Miscellaneous (Groundwater Monitoring Modifiers) ⁽⁷⁻¹¹⁾	\$497.00
Lodging & Per Diem (Lodging - actual only)	\$192.00
Laboratory Analysis ⁽¹²⁻¹³⁾	\$100.00
Report Preparation ⁽¹⁴⁻¹⁷⁾	\$1,000.00
Release Closure Plan (RCP) Preparation ⁽¹⁸⁾	\$1,000.00
Other Services	
Miscellaneous ()	\$0.00
Miscellaneous ()	\$0.00
Monitoring & Sampling Subtotal:	
	\$8,148.00
Additional Costs Subtotal:	
	\$0.00
Grand Total:	
	\$8,148.00



April 25, 2024

Mr. Kendall Gustafson
Montana Department of Transportation
2701 Prospect Avenue
Helena, MT 59620

Re: Approval of Remedial Investigation Work Plan, dated March 15, 2024, for the Petroleum Release at the MDT White Sulphur Springs 3rd Avenue Southwest Facility, 705 3rd Avenue Southwest, White Sulphur Springs, Meagher County, Montana; Facility ID 30-12376 (TID 25004), Release 6522, Work Plan ID 34821

Dear Mr. Gustafson:

DEQ has reviewed the above-referenced Work Plan (WP) prepared and submitted on your behalf by Pioneer Technical Services, Inc. The scope of the WP includes performing a remedial investigation to determine the magnitude and extent of any petroleum contamination remaining after the excavation performed.

The WP is approved with the following comments:

- In addition to the volatile petroleum hydrocarbon (VPH) and extractable petroleum hydrocarbon (EPH) analysis, have both soil and groundwater samples analyzed for the lead scavengers 1,2-DCA and EDB.
- Analyze groundwater samples for intrinsic biodegradation indicators (IBIs).
- Provide documentation on why a receptor survey is not required as part of this Remedial Investigation Report.
- Discuss ongoing WP tasks and results with DEQ's project manager; submit written agreed-upon WP modifications as required to complete the WP objectives.

The scope of the above-mentioned WP and the required report are due by **December 31, 2024**. No additional work is authorized beyond this date unless DEQ approves it in writing. If you are unable to complete the required tasks by this date, you may request an extension. You must submit your requests for an extension in writing to DEQ's project manager at least 10 days before the final due date noted above.

Mr. Kendall Gustafson
MDT White Sulphur Springs 3rd Avenue Southwest Facility, White Sulphur Springs
Facility ID 30-12376, TID 25004, Release 6522
April 25, 2024

OSHA regulations require your consultant or contractor to have and maintain a current site-specific health and safety plan during all field activities¹.

The Petroleum Release Compensation Board (PTRCB) will review the costs associated with this WP and provide comments under separate correspondence. DEQ's approval of the scope of work does not guarantee PTRCB will allow funding for or reimburse you for costs incurred to implement this WP. If you have any questions regarding reimbursement, please contact PTRCB at (406) 444-9710 or (800) 556-5291.

DEQ reserves the right to modify the WP before you implement it or to require the use of a different remediation method if site conditions change or if additional information becomes available that affects your proposed remediation plan. Please notify DEQ's project manager at least 10 working days prior to performing any field activities so that we can schedule a site visit, if necessary.

If you have any questions, please contact me at (406) 444-0216 or by email at wbergum@mt.gov.

Sincerely,



William Bergum
Environmental Project Officer
Petroleum Tank Cleanup Section

ec: Mr. A.J. Pate, PTRCB
Mr. Sean Hill, Meagher County Sanitarian
Mr. Jason Decker, Pioneer Technical Services, Inc.
Mr. Charlie Peterson, Pioneer Technical Services, Inc.
Mr. Kendall Gustafson, Montana Department of Transportation

¹ U.S. Occupational Safety and Health Administration, Hazardous Waste Operations and Emergency Response Regulation 29 CFR 1910.120



Petroleum Tank Release Compensation Board

STATE OF MONTANA

P.O. Box 200902 • Helena, MT 59620-0902 • (406) 444-9710 • Website:
<http://deq.mt.gov/DEQAdmin/pet>

May 25, 2024

Aaron Anderson
Montana Department of Transportation
P.O. Box 201001
Helena, MT 59620

SUBJECT: Petroleum Tank Release Compensation Board (PTRCB) staff review of the costs for the Remediation Work Plan submitted by Tetra-Tech, Inc, dated November 30, 2023, for the petroleum release at the MDT White Sulphur Springs Maintenance Facility, 705 3rd Ave SW, White Sulphur Springs, Montana; Facility ID 3012376 (TID 25004), Release 4435, Work Plan 34821.

Dear Mr. Anderson:

Please visit our website (<http://deq.mt.gov/DEQAdmin/PET/codesratestasks>) for general information concerning PTRCB's review of this corrective action plan, the allocation of costs to tasks, associated codes, and standards associated with reimbursement of claims.

The Board staff would recommend approval of claims for the following work not to exceed the total cost of **\$50,005.25** for the following tasks as proposed in the corrective action work plan. Note that underlined items are changes made by the Board staff from the original work plan submitted.

The costs for analysis of the groundwater samples are not included in the budget reviewed by PTRCB staff. Consequently, costs for lab analyses of samples are not included in this obligation though such activities are included in the narrative of the work plan. A Form 8 specifying these lab costs would be appropriate documentation if it is anticipated that these costs will be claimed in the future.

- **Task 1 – Work Plan Preparation – \$1,400.00**
 - Reimburse no more than the maximum reimbursable costs for preparation of a Remedial Investigation Work Plan.
- **Task 2 – Project Management – \$3,773.00**
 - Reimbursement for project management. This task is the process of creating, monitoring, controlling the scope of work, scheduling and budgeting of all phases of environmental work. Task includes communications with the owner/operator and agency. Project management also includes coordination, staff oversight, scheduling, correspondence,

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024.

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permitting, and updating any health and safety plan.

- **Task 3 – Mobilization – \$2,903.25**

- Reimbursement of **\$3.83** per mile for **147** miles for mobilization of a technician level professional to worksite from consultant's nearest office to conduct the groundwater monitoring activities as described the work plan.
- Reimbursement of **\$6.00** per mile for **147** miles for mobilization of drilling rig and operators to worksite from consultant's nearest office to conduct the drilling/completion activities described in the work plan.
- Reimbursement of **\$5.88** per mile for **147** miles for mobilization of surveyor crew to worksite from consultant's nearest office to conduct the survey activities described in the work plan.
- Reimbursement of **\$4.04** per mile for **147** miles for mobilization of a staff level professional to worksite from consultant's nearest office to conduct the oversight activities (soil boring and well installation, and related soil sampling) described in the work plan.
- This mobilization task includes all costs and mileage to transport equipment, materials, and personnel to and from the site location. Included in this task is preparation time for loading and unloading equipment/materials and supplies and additional miles for hotel, meals, etc.
- Mobilization distances are calculated from the consultant's office nearest to worksite.

- **Task 4 – Monitoring – \$2,570.00**

- Reimburse no more than the established standards as set forth in ARM 17.58.341 to monitor ten (10) wells [and collect one (1) duplicate sample] on during one (1) sampling events.
- This reimbursement includes costs for IBI modifier and duplicate sample modifier.
- This reimbursement includes site setup, all labor, equipment, materials, and consumables for locating, monitoring, purging and collection of water samples. Recording the depth to groundwater is considered, by the State, a subtask of monitoring.
- If a well's condition precludes sampling during the monitoring event, PTRCB will reimburse no more than the established standards as set forth in ARM 17.58.341 for well assessment at the particular well.
- Reimbursement includes allowed PTRCB sampling fee at \$10.00 per sample, to cover ice, cooler, packing, shipping, and office-related handling charges.

- **Task 5 – Lab Analyses (Water Samples) – \$110.00**

- Reimbursement for the actual costs of analyses of up to eleven (11) *water samples* [and one (1) duplicate] for the following set of analytes:
 - VPH (11 samples)
 - EPH Screens (11 samples)
 - EPH Fractions (5 samples)
 - Lead Scavenger-EDB (11 samples)
 - Lead Scavenger-DCA (11 samples)

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024.

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- Intrinsic Biological Indicators (1 samples)
 - Reimbursement includes actual costs for lab sample disposal costs.
 - Reimbursement of the PTRCB sampling fee for the management of the sample including sample container, cooler, packing, shipping, handling, sample preservation and office related charges.
 - NOTE: as requested in the consultant's workplan, costs for the planned analyses have not been included. It is noted in the work plan that analytical costs will be invoiced to Montana Department of Transportation (MDOT). If MDOT plans to claim these lab costs, please submit a Form 8 for review and modification of the obligated task budget. The above reimbursement is for the *PTRCB sample fee* on the planned eleven (11) groundwater samples.
- **Task 6 – Well Installation – \$19,788.00**
 - Reimbursement for the labor, equipment, and materials costs to install up to twenty (20) soil borings and complete up to ten (10) of those soil borings into monitor wells.
 - **The soil boring and well installation consumables and equipment will be reimbursed based on actual costs. Please include proof of payment when claiming these costs**
- **Task 7 – Equipment & Supplies – \$637.50**
 - Reimbursement for 24 hours rental/use of PID meter (soil boring/well install oversight).
 - Reimbursement for two (2) days rental of concrete saw.
- **Task 8 – Well Development – \$1,500.00**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 to develop up to ten (10) wells. Includes all labor, equipment, and materials.
- **Task 9 – Fieldwork (Soil Boring/Well Installation Oversight) – \$5,964.00**
 - Reimbursement staff level professional labor to provide oversight on the subcontracted soil boring and well installation activities, including soil and stockpile confirmation sampling.
- **Task 10 – Survey (Receptor) – \$1,300.00**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 for a receptor survey, including reporting aspects of the survey.
- **Task 11 – Miscellaneous (Petroleum Vapor Desktop Investigation) – \$1,180.00**
 - Reimbursement for the drafting of a desktop petroleum vapor intrusion investigation.
- **Task 12 – Lodging/Per Diem – \$2,261.50**
 - Groundwater Monitoring: reimburse no more than actual costs of one (1) night lodging and two (2) full day meals.
 - Geoprobe crew: reimburse no more than actual costs of eight (8) nights lodging and ten (10) full day meals.
 - Oversight: reimburse no more than actual costs of four (4) nights lodging and five (5) full

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024.

Page 4 of 5

day meals.

- Per diem (meals) will only be reimbursed for those hours when personnel are in travel status. Please see Standard Rates on our website for eligible hours.

- **Task 13 – Survey – \$1,312.00**
 - Reimburse for survey of the newly installed monitoring wells and soil boring locations.
 - Reimbursement for well notch surveys includes all labor and equipment necessary to complete the task, including both field and office components of the task.

- **Task 14 – Data Validation Summary Form – \$142.00**
 - Reimburse no more than one (1) hours to fill out a Data Validation Summary Forms (DVSF) not to exceed the approved Staff Engineer/Scientist/Geologist rate. Note: this task is not data validation per se, but only the clerical reporting of the data validation of one (1) dataset. The Petro-Fund considers the data validation effort to be inherent in the reporting task.

- **Task 15 – Release Closure Plan (Create) – \$1,464.00**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 for the creation to the Release Closure Plan (RCP).

- **Task 16 – Report (Remedial Investigation) – \$3,700.00**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 for preparation of a Groundwater Monitoring Report, including any required data validation

This obligation letter contains reimbursement for installation of monitoring wells. The Petroleum Tank Release Compensation Board (Board) has a reasonable expectation, based on §36.21.808 ARM, that an owner will maintain as an asset any well for which the costs are borne by the Petroleum Tank Release Cleanup Fund (Fund). This expectation is for the life of the release for which the well was installed so that access and proper usage can be maintained. The proper installation of these wells includes but not limited to the following considerations:

- a) adequate well depths and screening intervals corresponding to natural variations in water depth,
- b) maximum expected loading in selection/design of wellhead/cover/mount design, etc.

as part of the asset protection and maintenance expected for monies reimbursed for Well Installation from the Fund. Should wells become damaged or permanently inaccessible, the Board requests justification from the owner or their consultant for Fund liability for replacement or repair of those assets, if there still exists a current or future need for sampling from the damaged or lost asset.

The Board staff will not recommend reimbursement of costs exceeding those submitted and approved with this plan unless a written Corrective Action Plan Budget Modification Form (PTRCB Form 8) is received and approved. A data input form for the Form 8 can be found on the PTRCB web site at <https://deq.mt.gov/cleanupandrec/programs/ptrcb>.

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024.

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The owner/operator is reminded all comments on the costs of work proposed in this plan are based on costs information supplied with the corrective action work plan.

Please be sure to read the Corrective Action approval letter from the Department of Environmental Quality for technical guidance pertaining to the completion of the above referenced work plan.

If you have questions regarding these comments pertaining to this corrective action plan, please contact me at (406) 444-9717 or email at ajpate@mt.gov.

Sincerely,



A.J. Pate

Fund Cost Specialist

cc: Jason Decker, *Senior Engineer II, Pioneer Technical Services Inc*
William Bergum, Environmental Project Officer, PTCS MTDEQ



Petroleum Tank Release Compensation Board

STATE OF MONTANA

P.O. Box 200902 • Helena, MT 59620-0902 • (406) 444-9710 • Website:
<http://deq.mt.gov/DEQAdmin/pet>

May 28, 2024

Aaron Anderson
Montana Department of Transportation
P.O. Box 201001
Helena, MT 59620

SUBJECT: Petroleum Tank Release Compensation Board (PTRCB) staff review of the costs for the Remediation Work Plan submitted by Pioneer Technical Services Inc, dated November 30, 2023, for the petroleum release at the MDT White Sulphur Springs Maintenance Facility, 705 3rd Ave SW, White Sulphur Springs, Montana; Facility ID 3012376 (TID 25004), Release 6522, Work Plan 34821.

Dear Mr. Anderson:

Please visit our website (<http://deq.mt.gov/DEQAdmin/PET/codesraterestasks>) for general information concerning PTRCB's review of this corrective action plan, the allocation of costs to tasks, associated codes, and standards associated with reimbursement of claims.

The Board staff would recommend approval of claims for the following work not to exceed the total cost of **\$50,005.25** for the following tasks as proposed in the corrective action work plan. Note that underlined items are changes made by the Board staff from the original work plan submitted.

Note: this current PTRCB funding obligation letter corrects details from the earlier incorrect May 25th version. The task budgets and descriptions remain unchanged from the May 25, 2024, version.

The costs for analysis of the groundwater samples are not included in the budget reviewed by PTRCB staff. Consequently, costs for lab analyses of samples are not included in this obligation though such activities are included in the narrative of the work plan. A Form 8 specifying these lab costs would be appropriate documentation if it is anticipated that these costs will be claimed in the future.

- **Task 1 – Work Plan Preparation – \$1,400.00**
 - Reimburse no more than the maximum reimbursable costs for preparation of a Remedial Investigation Work Plan.

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024.

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- **Task 2 – Project Management – \$3,773.00**
 - Reimbursement for project management. This task is the process of creating, monitoring, controlling the scope of work, scheduling and budgeting of all phases of environmental work. Task includes communications with the owner/operator and agency. Project management also includes coordination, staff oversight, scheduling, correspondence, permitting, and updating any health and safety plan.

- **Task 3 – Mobilization – \$2,903.25**
 - Reimbursement of **\$3.83** per mile for **147** miles for mobilization of a technician level professional to worksite from consultant's nearest office to conduct the groundwater monitoring activities as described the work plan.
 - Reimbursement of **\$6.00** per mile for **147** miles for mobilization of drilling rig and operators to worksite from consultant's nearest office to conduct the drilling/completion activities described in the work plan.
 - Reimbursement of **\$5.88** per mile for **147** miles for mobilization of surveyor crew to worksite from consultant's nearest office to conduct the survey activities described in the work plan.
 - Reimbursement of **\$4.04** per mile for **147** miles for mobilization of a staff level professional to worksite from consultant's nearest office to conduct the oversight activities (soil boring and well installation, and related soil sampling) described in the work plan.
 - This mobilization task includes all costs and mileage to transport equipment, materials, and personnel to and from the site location. Included in this task is preparation time for loading and unloading equipment/materials and supplies and additional miles for hotel, meals, etc.
 - Mobilization distances are calculated from the consultant's office nearest to worksite.

- **Task 4 – Monitoring – \$2,570.00**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 to monitor ten (10) wells [and collect one (1) duplicate sample] on during one (1) sampling events.
 - This reimbursement includes costs for IBI modifier and duplicate sample modifier.
 - This reimbursement includes site setup, all labor, equipment, materials, and consumables for locating, monitoring, purging and collection of water samples. Recording the depth to groundwater is considered, by the State, a subtask of monitoring.
 - If a well's condition precludes sampling during the monitoring event, PTRCB will reimburse no more than the established standards as set forth in ARM 17.58.341 for well assessment at the particular well.
 - Reimbursement includes allowed PTRCB sampling fee at \$10.00 per sample, to cover ice, cooler, packing, shipping, and office-related handling charges.

- **Task 5 – Lab Analyses (Water Samples) – \$110.00**
 - Reimbursement for the actual costs of analyses of up to eleven (11) *water samples* [and one (1) duplicate] for the following set of analytes:

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024.

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- VPH (11 samples)
- EPH Screens (11 samples)
- EPH Fractions (5 samples)
- Lead Scavenger-EDB (11 samples)
- Lead Scavenger-DCA (11 samples)
- Intrinsic Biological Indicators (1 samples)
- Reimbursement includes actual costs for lab sample disposal costs.
- Reimbursement of the PTRCB sampling fee for the management of the sample including sample container, cooler, packing, shipping, handling, sample preservation and office related charges.
- NOTE: as requested in the consultant's workplan, costs for the planned analyses have not been included. It is noted in the work plan that analytical costs will be invoiced to Montana Department of Transportation (MDOT). If MDOT plans to claim these lab costs, please submit a Form 8 for review and modification of the obligated task budget. The above reimbursement is for the *PTRCB sample fee* on the planned eleven (11) groundwater samples.
- **Task 6 – Well Installation – \$19,788.00**
 - Reimbursement for the labor, equipment, and materials costs to install up to twenty (20) soil borings and complete up to ten (10) of those soil borings into monitor wells.
 - [The soil boring and well installation consumables and equipment will be reimbursed based on actual costs. Please include proof of payment when claiming these costs](#)
- **Task 7 – Equipment & Supplies – \$637.50**
 - Reimbursement for 24 hours rental/use of PID meter (soil boring/well install oversight).
 - Reimbursement for two (2) days rental of concrete saw.
- **Task 8 – Well Development – \$1,500.00**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 to develop up to ten (10) wells. Includes all labor, equipment, and materials.
- **Task 9 – Fieldwork (Soil Boring/Well Installation Oversight) – \$5,964.00**
 - Reimbursement staff level professional labor to provide oversight on the subcontracted soil boring and well installation activities, including soil and stockpile confirmation sampling.
- **Task 10 – Survey (Receptor) – \$1,300.00**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 for a receptor survey, including reporting aspects of the survey.
- **Task 11 – Miscellaneous (Petroleum Vapor Desktop Investigation) – \$1,180.00**
 - Reimbursement for the drafting of a desktop petroleum vapor intrusion investigation.
- **Task 12 – Lodging/Per Diem – \$2,261.50**

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024.

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- Groundwater Monitoring: reimburse no more than actual costs of one (1) night lodging and two (2) full day meals.
- Geoprobe crew: reimburse no more than actual costs of eight (8) nights lodging and ten (10) full day meals.
- Oversight: reimburse no more than actual costs of four (4) nights lodging and five (5) full day meals.
- Per diem (meals) will only be reimbursed for those hours when personnel are in travel status. Please see Standard Rates on our website for eligible hours.

- **Task 13 – Survey – \$1,312.00**
 - Reimburse for survey of the newly installed monitoring wells and soil boring locations.
 - Reimbursement for well notch surveys includes all labor and equipment necessary to complete the task, including both field and office components of the task.

- **Task 14 – Data Validation Summary Form – \$142.00**
 - Reimburse no more than one (1) hours to fill out a Data Validation Summary Forms (DVSF) not to exceed the approved Staff Engineer/Scientist/Geologist rate. Note: this task is not data validation per se, but only the clerical reporting of the data validation of one (1) dataset. The Petro-Fund considers the data validation effort to be inherent in the reporting task.

- **Task 15 – Release Closure Plan (Create) – \$1,464.00**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 for the creation to the Release Closure Plan (RCP).

- **Task 16 – Report (Remedial Investigation) – \$3,700.00**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 for preparation of a Groundwater Monitoring Report, including any required data validation

This obligation letter contains reimbursement for installation of monitoring wells. The Petroleum Tank Release Compensation Board (Board) has a reasonable expectation, based on §36.21.808 ARM, that an owner will maintain as an asset any well for which the costs are borne by the Petroleum Tank Release Cleanup Fund (Fund). This expectation is for the life of the release for which the well was installed so that access and proper usage can be maintained. The proper installation of these wells includes but not limited to the following considerations:

a) adequate well depths and screening intervals corresponding to natural variations in water depth,

b) maximum expected loading in selection/design of wellhead/cover/mount design, etc.

as part of the asset protection and maintenance expected for monies reimbursed for Well Installation from the Fund. Should wells become damaged or permanently inaccessible, the Board requests justification from the owner or their consultant for Fund liability for replacement or repair of those assets, if there still exists a current or future need for sampling from the damaged or lost asset.

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024.

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The Board staff will not recommend reimbursement of costs exceeding those submitted and approved with this plan unless a written Corrective Action Plan Budget Modification Form (PTRCB Form 8) is received and approved. A data input form for the Form 8 can be found on the PTRCB web site at <https://deq.mt.gov/cleanupandrec/programs/ptrcb>.

The owner/operator is reminded all comments on the costs of work proposed in this plan are based on costs information supplied with the corrective action work plan.

Please be sure to read the Corrective Action approval letter from the Department of Environmental Quality for technical guidance pertaining to the completion of the above referenced work plan.

If you have questions regarding these comments pertaining to this corrective action plan, please contact me at (406) 444-9717 or email at ajpate@mt.gov.

Sincerely,



A.J. Pate

Fund Cost Specialist

cc: Jason Decker, Senior Engineer II, Pioneer Technical Services Inc
William Bergum, Environmental Project Officer, PTCS MTDEQ



Petroleum Tank Release Compensation Board

STATE OF MONTANA

P.O. Box 200902 • Helena, MT 59620-0902 • (406) 444-9710 • Website:
<http://deq.mt.gov/DEQAdmin/pet>

December 04, 2024

Aaron Anderson
Montana Department of Transportation
P.O. Box 201001
Helena, MT 59620

SUBJECT: Petroleum Tank Release Compensation Board (PTRCB) staff review of the costs for the Remediation Work Plan submitted by Pioneer Technical Services Inc, dated November 30, 2023, for the petroleum release at the MDT White Sulphur Springs Maintenance Facility, 705 3rd Ave SW, White Sulphur Springs, Montana; Facility ID 3012376 (TID 25004), Release 6522, Work Plan 34821. [Modified to include Form 8 dated November 11, 2024]

Dear Mr. Anderson:

Please visit our website (<http://deq.mt.gov/DEQAdmin/PET/codesraterestasks>) for general information concerning PTRCB's review of this corrective action plan, the allocation of costs to tasks, associated codes, and standards associated with reimbursement of claims.

The Board staff would recommend approval of claims for the following work not to exceed the total cost of ~~\$50,005.25~~ \$64,979.76 for the following tasks as proposed in the corrective action work plan. Note that underlined items are changes made by the Board staff from the original work plan submitted.

Note: this current PTRCB funding obligation letter corrects details from the earlier incorrect May 25th version. The task budgets and descriptions remain unchanged from the May 25, 2024, version.

This current modification of the PTRCB funding obligation letter is to communicate the changed scope of work detailed in Pioneer Technical Services' Form 8 dated 11 November 2024. The modifications are highlighted in blue font.

The costs for analysis of the groundwater samples are not included in the budget reviewed by PTRCB staff. Consequently, costs for lab analyses of samples are not included in this obligation though such activities are included in the narrative of the work plan. A Form 8 specifying these lab costs would be appropriate documentation if it is anticipated that these costs will be claimed in the future.

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024, [modified on Dec 04, 2024](#).

Page 2 of 5

- **Task 1 – Work Plan Preparation – ~~\$1,400.00~~**
 - Reimburse no more than the maximum reimbursable costs for preparation of a Remedial Investigation Work Plan.

- **Task 2 – Project Management – ~~\$3,773.00~~ **\$4,921.00****
 - Reimbursement for project management. This task is the process of creating, monitoring, controlling the scope of work, scheduling and budgeting of all phases of environmental work. Task includes communications with the owner/operator and agency. Project management also includes coordination, staff oversight, scheduling, correspondence, permitting, and updating any health and safety plan.

- **Task 3 – Mobilization – ~~\$2,903.25~~ **\$4,060.14****
 - Reimbursement of **\$3.83** per mile for **147 294** miles for mobilization of a technician level professional to worksite from consultant's nearest office to conduct the groundwater monitoring activities as described the work plan.
 - Reimbursement of **\$6.00** per mile for **147** miles for mobilization of drilling rig and operators to worksite from consultant's nearest office to conduct the drilling/completion activities described in the work plan.
 - Reimbursement of **\$5.88** per mile for **147** miles for mobilization of surveyor crew to worksite from consultant's nearest office to conduct the survey activities described in the work plan.
 - Reimbursement of **\$4.04** per mile for **147 294** miles for mobilization of a staff level professional to worksite from consultant's nearest office to conduct the oversight activities (soil boring and well installation, and related soil sampling) described in the work plan.
 - This mobilization task includes all costs and mileage to transport equipment, materials, and personnel to and from the site location. Included in this task is preparation time for loading and unloading equipment/materials and supplies and additional miles for hotel, meals, etc.
 - Mobilization distances are calculated from the consultant's office nearest to worksite.

- **Task 4 – Monitoring – ~~\$2,570.00~~ **\$2,849.50****
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 to monitor ~~ten (10)~~ **nine (9)** wells [and collect one (1) duplicate sample] on during one (1) sampling events.
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 to monitor ~~ten (10)~~ **two (2)** wells [and collect one (1) duplicate sample] on during one (1) sampling events.
 - This reimbursement includes costs for IBI modifier and duplicate sample modifier.
 - This reimbursement includes site setup, all labor, equipment, materials, and consumables for locating, monitoring, purging and collection of water samples. Recording the depth to groundwater is considered, by the State, a subtask of monitoring.
 - If a well's condition precludes sampling during the monitoring event, PTRCB will reimburse no more than the established standards as set forth in ARM 17.58.341 for well assessment at the particular well.

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024, [modified on Dec 04, 2024](#).

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- Reimbursement includes allowed PTRCB sampling fee at \$10.00 per sample, to cover ice, cooler, packing, shipping, and office-related handling charges.
- **Task 5 – Lab Analyses (Water Samples) – ~~\$110.00~~ \$130.00**
 - Reimbursement for the actual costs of analyses of up to ~~ten (10)~~ [eleven \(11\)](#) water samples [and ~~one (1)~~ [two \(2\)](#) duplicate] for the following set of analytes:
 - VPH (11 samples)
 - EPH Screens (11 samples)
 - EPH Fractions (5 samples)
 - Lead Scavenger-EDB (11 samples)
 - Lead Scavenger-DCA (11 samples)
 - Intrinsic Biological Indicators (1 samples)
 - Reimbursement includes actual costs for lab sample disposal costs.
 - Reimbursement of the PTRCB sampling fee for the management of the sample including sample container, cooler, packing, shipping, handling, sample preservation and office related charges.
 - NOTE: as requested in the consultant’s workplan, costs for the planned analyses have not been included. It is noted in the work plan that analytical costs will be invoiced to Montana Department of Transportation (MDOT). If MDOT plans to claim these lab costs, please submit a Form 8 for review and modification of the obligated task budget. The above reimbursement is for the *PTRCB sample fee* on the planned ~~eleven (11)~~ [thirteen \(13\)](#) groundwater samples.
- **Task 6 – Well Installation – ~~\$19,788.00~~ \$29,623.62**
 - Reimbursement for the labor, equipment, and materials costs to install up to ~~twenty (20)~~ [seventeen \(17\)](#) soil borings and complete up to ~~ten (10)~~ [nine \(9\)](#) of those soil borings into monitor wells.
 - [Reimbursement for the subcontracted costs of installing up to four \(4\) soil borings and completing up to two \(2\) of those soil borings into monitor wells.](#)
 - [The soil boring and well installation consumables and equipment will be reimbursed based on actual costs. Please include proof of payment when claiming these costs](#)
- **Task 7 – Equipment & Supplies – ~~\$637.50~~ \$917.50**
 - Reimbursement for 24 hours rental/use of PID meter (soil boring/well install oversight).
 - [Reimbursement for 16 hours rental/use of PID meter \(soil boring/well install oversight\).](#)
 - Reimbursement for two (2) days rental of concrete saw.
- **Task 8 – Well Development – ~~\$1,500.00~~ \$1,650.00**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 to develop up to ~~ten (10)~~ [eleven \(11\)](#) wells. Includes all labor, equipment, and materials.
- **Task 9 – Fieldwork (Soil Boring/Well Installation Oversight) – ~~\$5,964.00~~ \$7,242.00**
 - Reimbursement staff level professional labor to provide oversight on the subcontracted soil boring and well installation activities, including soil and stockpile confirmation sampling.

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024, [modified on Dec 04, 2024](#).

Page 4 of 5

- **Task 10 – Survey (Receptor) – \$1,300.00**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 for a receptor survey, including reporting aspects of the survey.
- **Task 11 – Miscellaneous (Petroleum Vapor Desktop Investigation) – \$1,180.00**
 - Reimbursement for the drafting of a desktop petroleum vapor intrusion investigation.
- **Task 12 – Lodging/Per Diem – ~~\$2,261.50~~ \$2,804.00**
 - Groundwater Monitoring: reimburse no more than actual costs of ~~one (1)~~ **two (2)** nights lodging and ~~two (2)~~ **four (4)** full day meals.
 - Geoprobe crew: reimburse no more than actual costs of eight (8) nights lodging and ten (10) full day meals.
 - Oversight: reimburse no more than actual costs of ~~four (4)~~ **six (6)** nights lodging and ~~five (5)~~ **eight (8)** full day meals.
 - Per diem (meals) will only be reimbursed for those hours when personnel are in travel status. Please see Standard Rates on our website for eligible hours.
- **Task 13 – Survey – \$1,312.00**
 - Reimburse for survey of the newly installed monitoring wells and soil boring locations.
 - Reimbursement for well notch surveys includes all labor and equipment necessary to complete the task, including both field and office components of the task.
- **Task 14 – Data Validation Summary Form – ~~\$142.00~~ \$426.00**
 - Reimburse no more than one(1) **three (3)** hours to fill out **three (3)** Data Validation Summary Forms (DVSF) not to exceed the approved Staff Engineer/Scientist/Geologist rate. Note: this task is not data validation per se, but only the clerical reporting of the data validation of one (1) dataset. The Petro-Fund considers the data validation effort to be inherent in the reporting task.
- **Task 15 – Release Closure Plan (Create) – \$1,464.00**
 - Reimburse no more than the established standards as set forth in ARM 17.58.341 for the creation to the Release Closure Plan (RCP).
- **Task 16 – Report (Remedial Investigation) – \$3,700.00**

Reimburse no more than the established standards as set forth in ARM 17.58.341 for preparation of a Groundwater Monitoring Report, including any required data validation

This obligation letter contains reimbursement for installation of monitoring wells. The Petroleum Tank Release Compensation Board (Board) has a reasonable expectation, based on §36.21.808 ARM, that an owner will maintain as an asset any well for which the costs are borne by the Petroleum Tank Release Cleanup Fund (Fund). This expectation is for the life of the release for which the well was installed so that access and proper usage can be maintained. The proper installation of these wells includes but not limited to the following considerations:

MDT White Sulphur Springs Maintenance Facility

Facility 3012376, Release 6522, Work Plan 34821

PTRCB cost review of May 25, 2024, [modified on Dec 04, 2024](#).

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a) adequate well depths and screening intervals corresponding to natural variations in water depth,
b) maximum expected loading in selection/design of wellhead/cover/mount design, etc. as part of the asset protection and maintenance expected for monies reimbursed for Well Installation from the Fund. Should wells become damaged or permanently inaccessible, the Board requests justification from the owner or their consultant for Fund liability for replacement or repair of those assets, if there still exists a current or future need for sampling from the damaged or lost asset.

The Board staff will not recommend reimbursement of costs exceeding those submitted and approved with this plan unless a written Corrective Action Plan Budget Modification Form (PTRCB Form 8) is received and approved. A data input form for the Form 8 can be found on the PTRCB web site at <https://deq.mt.gov/cleanupandrec/programs/ptrcb>.

The owner/operator is reminded all comments on the costs of work proposed in this plan are based on costs information supplied with the corrective action work plan.

Please be sure to read the Corrective Action approval letter from the Department of Environmental Quality for technical guidance pertaining to the completion of the above referenced work plan.

If you have questions regarding these comments pertaining to this corrective action plan, please contact me at (406) 444-9717 or email at ajpate@mt.gov.

Sincerely,



A.J. Pate
Fund Cost Specialist

cc: Jason Decker, Senior Engineer II, Pioneer Technical Services Inc
William Bergum, Environmental Project Officer, PTCS MTDEQ



ANALYTICAL SUMMARY REPORT

October 31, 2024

MT Dept of Transportation
PO Box 201001
Helena, MT 59620-1001

Work Order: H24100357

Project Name: MDT WSS Maintenance Facility

Energy Laboratories Inc Helena MT received the following 28 samples for MT Dept of Transportation on 10/9/2024 for analysis.

Lab ID	Client Sample ID	Collect Date	Receive Date	Matrix	Test
H24100357-001	MW-1 [2-4]	10/07/24 12:40	10/09/24	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Percent Moisture EDB & EDC in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
H24100357-002	MW-1 [8-10]	10/07/24 13:10	10/09/24	Soil	Same As Above
H24100357-003	MW-1 [18-20]	10/07/24 13:45	10/09/24	Soil	Same As Above
H24100357-004	MW-2 [2-4]	10/07/24 14:20	10/09/24	Soil	Same As Above
H24100357-005	MW-2 [6-8]	10/07/24 15:00	10/09/24	Soil	Same As Above
H24100357-006	MW-2 [12-15]	10/07/24 15:20	10/09/24	Soil	Same As Above
H24100357-007	MW-3 [2-4]	10/07/24 16:20	10/09/24	Soil	Same As Above
H24100357-008	MW-3 [4-6]	10/07/24 16:30	10/09/24	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 EPH-Fractionation Hydrocarbons, Aliphatic Extractable Petroleum Hydrocarbons, Aromatic Extractable Petroleum Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Percent Moisture EDB & EDC in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
H24100357-009	MW-3 [6-8]	10/07/24 16:40	10/09/24	Soil	Same As Above
H24100357-010	MW-4 [2.5-5]	10/08/24 9:50	10/09/24	Soil	Same As Above
H24100357-011	MW-4 [7.5-10]	10/08/24 10:15	10/09/24	Soil	Same As Above



ANALYTICAL SUMMARY REPORT

H24100357-012	MW-4 [12-14]	10/08/24 10:25	10/09/24	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Percent Moisture EDB & EDC in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
H24100357-013	MW-4 [22-25]	10/08/24 10:40	10/09/24	Soil	Same As Above
H24100357-014	SB-16 [10-12]	10/08/24 11:15	10/09/24	Soil	Same As Above
H24100357-015	SB-16 [16-18]	10/08/24 11:45	10/09/24	Soil	Same As Above
H24100357-016	SB-16 [22-25]	10/08/24 12:30	10/09/24	Soil	Same As Above
H24100357-017	MW-5 [10-12]	10/08/24 13:30	10/09/24	Soil	Same As Above
H24100357-018	MW-5 [12-14]	10/08/24 13:40	10/09/24	Soil	Same As Above
H24100357-019	MW-5 [18-20]	10/08/24 14:30	10/09/24	Soil	Same As Above
H24100357-020	SB-17 [8-10]	10/09/24 8:45	10/09/24	Soil	Same As Above
H24100357-021	SB-17 [15-20]	10/09/24 9:15	10/09/24	Soil	Same As Above
H24100357-022	MW-6 [2-4]	10/09/24 9:50	10/09/24	Soil	Same As Above
H24100357-023	MW-6 [4-6]	10/09/24 10:00	10/09/24	Soil	Same As Above
H24100357-024	MW-6 [14-16]	10/09/24 10:30	10/09/24	Soil	Same As Above
H24100357-025	Trip Blank 1	10/07/24 12:40	10/09/24	Trip Blank	Methanol Extraction for Volatiles SW5035 Volatile Petroleum Hydrocarbons
H24100357-026	Trip Blank 2	10/07/24 12:40	10/09/24	Trip Blank	Same As Above
H24100357-027	Trip Blank 3	10/07/24 12:40	10/09/24	Trip Blank	Same As Above
H24100357-028	Trip Blank 4	10/07/24 12:40	10/09/24	Trip Blank	Same As Above

The analyses presented in this report were performed by Energy Laboratories, Inc., 3161 E. Lyndale Ave., Helena, MT 59604, unless otherwise noted. Any exceptions or problems with the analyses are noted in the report package. Any issues encountered during sample receipt are documented in the Work Order Receipt Checklist.

The results as reported relate only to the item(s) submitted for testing. This report shall be used or copied only in its entirety. Energy Laboratories, Inc. is not responsible for the consequences arising from the use of a partial report.

Energy Laboratories, Inc. verifies the reported results for the analysis has been technically reviewed and approved for release.

If you have any questions regarding these test results, please contact your Project Manager.



CLIENT: MT Dept of Transportation
Project: MDT WSS Maintenance Facility
Work Order: H24100357

Report Date: 10/31/24

CASE NARRATIVE

Tests associated with analyst identified as ELI-B were subcontracted to Energy Laboratories, 1120 S. 27th St., Billings, MT, EPA Number MT00005.

Per email from Robyn this should be invoiced to the department of transportation. Pioneer will still receive results. JCS 101524

Samples MW-3 at 4-6 and 6-8 and MW-4 at 2.5-5 and 7.5-10 were over the MCL for EPH Screen. Proceed with fractionation without PAHs per email from Robyn Sargent on 10/23/24. TKJ 10/23/24



Trust our People. Trust our Data.

Chain of Custody & Analytical Request Record

www.energylab.com

Account Information (Billing information)

Company/Name Pioneer Technical Services
 Contact Robyn Sargent
 Phone 406.545.4805
 Mailing Address 2310 Broadwater Ave., Ste. 1
 City, State, Zip Billings, MT 59102
 Email rsargent@pioneer-technical.com
 Receive Invoice Hard Copy Email
 Receive Report Hard Copy Email
 Purchase Order Quote Bottle Order 187513

Report Information (if different than Account Information)

Company/Name
 Contact
 Phone
 Mailing Address
 City, State, Zip
 Email
 Receive Report Hard Copy Email
 Special Report/Formats:
 LEVEL IV NELAC EDD/EDT (contact laboratory) Other

Comments

If EPH Screen exceeds 200 mg/kg, please fractionate

01 3.5
02 5.0
03 3.0
04 2.5

Project Information

Project Name, PWSID, Permit, etc. MDT WSS ~~Reservoir Inv. eas~~ Maintenance Facility
 Sampler Name Robyn Sargent Sampler Phone 214.662.3528
 Sample Origin State MT EPA/State Compliance Yes No
 URANIUM MINING CLIENTS MUST indicate sample type
 Unprocessed Ore
 Processed Ore (Ground or Refined) **CALL BEFORE SENDING
 11(e)2 Byproduct Material (Can ONLY be Submitted to ELI Casper Location)

Matrix Codes

- A - Air
- W - Water
- S - Soils/Solids
- V - Vegetation
- B - Bioassay
- O - Oil
- DW - Drinking Water

Analysis Requested

Analysis Requested																		
VPH - MA VPH	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
EPH Screen	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
EBB + Lead Scav. - 1,2,3,4	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

All turnaround times are standard unless marked as RUSH.
 Energy Laboratories MUST be contacted prior to RUSH sample submittal for charges and scheduling - See Instructions Page

Sample Identification (Name, Location, Interval, etc.)	Collection		Number of Containers	Matrix (See Codes Above)	VPH - MA VPH	EPH Screen	EBB + Lead Scav. - 1,2,3,4												ELI LAB ID Laboratory Use Only	
	Date	Time																		
1 MW-1 (2-4)	10/7/24	1240	4	S	X	X	X													H24100357
2 MW-1 (8-10)		1310	4	S	X	X	X													
3 MW-1 (18-20)		1345	4	S	X	X	X													
4 MW-2 (2-4)		1420	4	S	X	X	X													
5 MW-2 (6-8)		1500	4	S	X	X	X													
6 MW-2 (12-15)		1520	4	S	X	X	X													
7 MW-3 (2-4)		1620	4	S	X	X	X													
8 MW-3 (4-6)		1630	4	S	X	X	X													
9 MW-3 (6-8)		1640	4	S	X	X	X													

ELI is REQUIRED to provide preservative traceability. If the preservatives supplied with the bottle order were NOT used, please attach your preservative information with this COC.

Custody Record MUST be signed	Relinquished by (print) <u>Robyn Sargent</u>	Date/Time <u>10/9/24 1205</u>	Signature <u>[Signature]</u>	Received by (print) <u>Nevada Strandberg</u>	Date/Time <u>10/9/24/205</u>	Signature <u>[Signature]</u>
	Relinquished by (print) <u>Nevada Strandberg</u>	Date/Time <u>10/9/24 1327</u>	Signature <u>[Signature]</u>	Received by Laboratory (print) <u>Rebecca Tuck</u>	Date/Time <u>10-9-24 1327</u>	Signature <u>[Signature]</u>

LABORATORY USE ONLY

Shipped By <u>Hand</u>	Cooler ID(s) <u>4</u>	Custody Seals <u>Y N O B</u>	Intact <u>Y N</u>	Receipt Temp <u>see</u> °C	Temp Blank <u>Y N</u>	On Ice <u>Y N</u>	Payment Type <u>CC</u> Cash Check	Amount \$	Receipt Number (cash/check only)
------------------------	-----------------------	------------------------------	-------------------	----------------------------	-----------------------	-------------------	-----------------------------------	-----------	----------------------------------

In certain circumstances, samples submitted to Energy Laboratories, Inc. may be subcontracted to other certified laboratories in order to complete the analysis requested. This serves as notice of this possibility. All subcontracted data will be clearly notated on your analytical report.



Trust our People. Trust our Data.

Chain of Custody & Analytical Request Record

www.energylab.com

Account Information (Billing information)

Company/Name Pioneer Technical Services
 Contact Robyn Sargent
 Phone 406.545.4805
 Mailing Address 2310 Broadwater Ave., Ste. 1
 City, State, Zip Billings, MT 59102
 Email rsargent@pioneer-technical.com
 Receive Invoice Hard Copy Email
 Receive Report Hard Copy Email
 Purchase Order Quote Bottle Order 187513

Report Information (if different than Account Information)

Company/Name
 Contact
 Phone
 Mailing Address
 City, State, Zip
 Email
 Receive Report Hard Copy Email
 Special Report/Formats:
 LEVEL IV NELAC EDD/EDT (contact laboratory) Other

Comments

If EPH Screen Exceeds 200ng/kg, please fractionate

see p3

Project Information

Project Name, PWSID, Permit, etc. Maintenance Facility
 Project Name, PWSID, Permit, etc. MDT WSS
 Sampler Name Robyn Sargent Sampler Phone 214.662.3528
 Sample Origin State MT EPA/State Compliance Yes No
 URANIUM MINING CLIENTS MUST indicate sample type
 Unprocessed Ore
 Processed Ore (Ground or Refined) **CALL BEFORE SENDING
 11(e)2 Byproduct Material (Can ONLY be Submitted to ELI Casper Location)

Matrix Codes

- A - Air
- W - Water
- S - Solids/Solids
- V - Vegetation
- B - Bioassay
- O - Oil
- DW - Drinking Water

Analysis Requested

	VPH	EPH Screen	Lead Scavengers	EDB+1,2,DC4									
1	X	X	X										
2	X	X	X										
3	X	X	X										
4	X	X	X										
5	X	X	X										
6	X	X	X										
7	X	X	X										
8	X	X	X										
9	X	X	X										

All turnaround times are standard unless marked as RUSH.
 Energy Laboratories MUST be contacted prior to RUSH sample submittal for charges and scheduling - See Instructions Page

Sample Identification (Name, Location, Interval, etc.)	Collection		Number of Containers	Matrix (See Codes Above)	VPH	EPH Screen	Lead Scavengers	EDB+1,2,DC4										See Attached	RUSH TAT	ELI LAB ID
	Date	Time																		Laboratory Use Only
1 MW-4 (2.5-5)	10/8/24	0950	4	S	X	X	X													H24106357
2 MW-4 (7.5-10)		1015	4		X	X	X													
3 MW-4 (12-14)		1025	4		X	X	X													
4 MW-4 (22-25)		1040	4		X	X	X													
5 SB-16 (10-12)		1115	4		X	X	X													
6 SB-16 (16-18)		1145	4		X	X	X													
7 SB-16 (22-25)		1230	4		X	X	X													
8 MW-5 (10-12)		1330	4		X	X	X													
9 MW-5 (12-14)		1340	4		X	X	X													

ELI is REQUIRED to provide preservative traceability. If the preservatives supplied with the bottle order were NOT used, please attach your preservative information with this COC.

Custody Record MUST be signed	Relinquished by (print) <u>Robyn Sargent</u>	Date/Time <u>10/9/24 1205</u>	Signature <u>[Signature]</u>	Received by (print) <u>Nevada Strandberg</u>	Date/Time <u>10/9/24 1205</u>	Signature <u>[Signature]</u>			
	Relinquished by (print) <u>Nevada Strandberg</u>	Date/Time <u>10/9/24 1327</u>	Signature <u>[Signature]</u>	Received by Laboratory (print) <u>KeSeem N. G.</u>	Date/Time <u>10-9-24 1327</u>	Signature <u>[Signature]</u>			
LABORATORY USE ONLY									
Shipped By <u>[Signature]</u>	Cooler ID(s) <u>4</u>	Custody Seals <u>Y N C B</u>	Intact <u>Y N</u>	Receipt Temp <u>SW</u> °C	Temp Blank <u>Y N</u>	On Ice <u>Y N</u>	Payment Type CC Cash Check	Amount \$	Receipt Number (cash/check only)

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Chain of Custody & Analytical Request Record

www.energylab.com

Account Information (Billing information)

Company/Name Pioneer Technical Services
 Contact Robyn Sargent
 Phone 406.545.4805
 Mailing Address 2310 Broadwater Ave., Ste 1
 City, State, Zip Billings, MT 59102
 Email rsargent@pioneer-technical.com
 Receive Invoice Hard Copy Email
 Receive Report Hard Copy Email
 Purchase Order Quote Bottle Order 187513

Report Information (if different than Account Information)

Company/Name
 Contact
 Phone
 Mailing Address
 City, State, Zip
 Email
 Receive Report Hard Copy Email
 Special Report/Formats:
 LEVEL IV NELAC EDD/EDT (contact laboratory) Other

Comments

If EPH Screen Exceeds 200 mg/lly, please fractionate
 ← neg

Project Information

Project Name, PWSID, Permit, etc. MDT WSS ~~Remediation~~ Maintenance Facility
 Sampler Name Robyn Sargent Sampler Phone 214.662.3528
 Sample Origin State MT EPA/State Compliance Yes No
 URANIUM MINING CLIENTS MUST indicate sample type
 Unprocessed Ore
 Processed Ore (Ground or Refined) **CALL BEFORE SENDING
 11(e)2 Byproduct Material (Can ONLY be Submitted to ELI Casper Location)

Matrix Codes

- A - Air
- W - Water
- S - Soils/Solids
- V - Vegetation
- B - Bioassay
- O - Oil
- DW - Drinking Water

Analysis Requested

Sample ID	Matrix	Analysis	Analysis	Analysis	Analysis	Analysis	Analysis	Analysis	Analysis
1	S	VPH	EPH Screen	Lead scavengers	EDB + 1/2 DCA				
2	S	X	X	X					
3	S	X	X	X					
4	S	X	X	X					
5	S	X	X	X					
6	S	X	X	X					
7									
8									
9									

All turnaround times are standard unless marked as RUSH.
 Energy Laboratories MUST be contacted prior to RUSH sample submittal for charges and scheduling - See Instructions Page

See Attached
 RUSH
 TAT

ELI LAB ID

Laboratory Use Only
H24100357

ELI is REQUIRED to provide preservative traceability. If the preservatives supplied with the bottle order were NOT used, please attach your preservative information with this COC.

Custody Record MUST be signed	Relinquished by (print) <u>Robyn Sargent</u>	Date/Time <u>10/9/24 1205</u>	Signature <u>[Signature]</u>	Received by (print) <u>Nevada Strandberg</u>	Date/Time <u>10/9/24 1205</u>	Signature <u>[Signature]</u>
	Relinquished by (print) <u>Nevada Strandberg</u>	Date/Time <u>10/9/24 1327</u>	Signature <u>[Signature]</u>	Received by Laboratory (print) <u>Ke Seena Tolson</u>	Date/Time <u>10-9-24 1327</u>	Signature <u>[Signature]</u>
LABORATORY USE ONLY						
Shipped By <u>humb</u>	Cooler ID(s) <u>4</u>	Custody Seals <u>Y N C B</u>	Intact <u>Y N</u>	Receipt Temp <u>see com</u> °C	Temp Blank <u>Y N</u>	On Ice <u>Y N</u>
Payment Type <u>CC</u>			Cash	Check	Amount \$	Receipt Number (cash/check only)

In certain circumstances, samples submitted to Energy Laboratories, Inc. may be subcontracted to other certified laboratories in order to complete the analysis requested. This serves as notice of this possibility. All subcontracted data will be clearly notated on your analytical report.



ANALYTICAL SUMMARY REPORT

November 06, 2024

MT Dept of Transportation
PO Box 201001
Helena, MT 59620-1001

Work Order: B24101170

Project Name: MDT WSS Maintenance Facility

Energy Laboratories Inc Billings MT received the following 31 samples for MT Dept of Transportation on 10/11/2024 for analysis.

Lab ID	Client Sample ID	Collect Date	Receive Date	Matrix	Test
B24101170-001	MW-7 (15-18)	10/09/24 15:55	10/11/24	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Moisture Moisture Prep SW3550C Percent Moisture EDB in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
B24101170-002	MW-7 (18-20)	10/09/24 16:00	10/11/24	Soil	Same As Above
B24101170-003	SB-18 (10-12)	10/09/24 12:30	10/11/24	Soil	Same As Above
B24101170-004	SB-18 (14-15)	10/09/24 12:40	10/11/24	Soil	Same As Above
B24101170-005	SB-19 (4-6)	10/10/24 8:05	10/11/24	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 EPH Fractionation Hydrocarbons, Aliphatic Extractable Petroleum Hydrocarbons, Aromatic Extractable Petroleum Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Moisture Moisture Prep SW3550C Percent Moisture EDB in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List



ANALYTICAL SUMMARY REPORT

B24101170-006	SB-19 (8-10)	10/10/24 8:15	10/11/24	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Moisture Moisture Prep SW3550C Percent Moisture EDB in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
B24101170-007	SB-19 (16-18)	10/10/24 8:25	10/11/24	Soil	Same As Above
B24101170-008	MW-8 (5-7)	10/10/24 9:45	10/11/24	Soil	Same As Above
B24101170-009	MW-8 (12-14)	10/10/24 10:10	10/11/24	Soil	Same As Above
B24101170-010	MW-8 (18-20)	10/10/24 10:30	10/11/24	Soil	Same As Above
B24101170-011	MW-9 (8-10)	10/10/24 11:30	10/11/24	Soil	Same As Above
B24101170-012	MW-9 (16-18)	10/10/24 11:50	10/11/24	Soil	Same As Above
B24101170-013	SB-20 (8-10)	10/10/24 12:55	10/11/24	Soil	Same As Above
B24101170-014	SB-20 (12-15)	10/10/24 13:15	10/11/24	Soil	Same As Above
B24101170-015	SB-21 (2-5)	10/10/24 14:30	10/11/24	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 EPH Fractionation Hydrocarbons, Aliphatic Extractable Petroleum Hydrocarbons, Aromatic Extractable Petroleum Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Moisture Moisture Prep SW3550C Percent Moisture EDB in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List

ANALYTICAL SUMMARY REPORT

B24101170-016	SB-21 (10-12)	10/10/24 14:45	10/11/24	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Moisture Moisture Prep SW3550C Percent Moisture EDB in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
B24101170-017	SB-21 (18-20)	10/10/24 14:55	10/11/24	Soil	Same As Above
B24101170-018	SB-22 (2-5)	10/10/24 15:40	10/11/24	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 EPH Fractionation Hydrocarbons, Aliphatic Extractable Petroleum Hydrocarbons, Aromatic Extractable Petroleum Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Moisture Moisture Prep SW3550C Percent Moisture EDB in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
B24101170-019	SB-22 (7.5-10)	10/10/24 0:00	10/11/24	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Moisture Moisture Prep SW3550C Percent Moisture EDB in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
B24101170-020	SB-23 (7-10)	10/10/24 0:00	10/11/24	Soil	Same As Above
B24101170-021	Duplicate #1	10/09/24 0:00	10/11/24	Soil	Same As Above

ANALYTICAL SUMMARY REPORT

B24101170-022	Duplicate #2	10/10/24 0:00	10/11/24	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 EPH Fractionation Hydrocarbons, Aliphatic Extractable Petroleum Hydrocarbons, Aromatic Extractable Petroleum Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Moisture Moisture Prep SW3550C Percent Moisture EDB in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
B24101170-023	Duplicate #3	10/10/24 0:00	10/11/24	Soil	Same As Above
B24101170-024	Duplicate #4	10/10/24 0:00	10/11/24	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Moisture Moisture Prep SW3550C Percent Moisture EDB in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
B24101170-025	Duplicate #5	10/10/24 0:00	10/11/24	Soil	Same As Above
B24101170-026	Duplicate #6	10/10/24 0:00	10/11/24	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 EPH Fractionation Hydrocarbons, Aliphatic Extractable Petroleum Hydrocarbons, Aromatic Extractable Petroleum Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Moisture Moisture Prep SW3550C Percent Moisture EDB in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
B24101170-027	Trip Blank 1	10/09/24 12:40	10/11/24	Trip Blank	Methanol Extraction for Volatiles SW5035 Volatile Petroleum Hydrocarbons
B24101170-028	Trip Blank 2	10/10/24 9:45	10/11/24	Trip Blank	Same As Above



ANALYTICAL SUMMARY REPORT

B24101170-029	Trip Blank 3	10/09/24 12:30	10/11/24	Trip Blank	Same As Above
B24101170-030	Trip Blank 4	10/09/24 16:00	10/11/24	Trip Blank	Same As Above
B24101170-031	Trip Blank 5	10/10/24 11:30	10/11/24	Trip Blank	Same As Above

The analyses presented in this report were performed by Energy Laboratories, Inc., 1120 So. 27th Street, Billings, MT 59101, unless otherwise noted. Any exceptions or problems with the analyses are noted in the report package. Any issues encountered during sample receipt are documented in the Work Order Receipt Checklist.

The results as reported relate only to the item(s) submitted for testing. This report shall be used or copied only in its entirety. Energy Laboratories, Inc. is not responsible for the consequences arising from the use of a partial report.

Energy Laboratories, Inc. verifies the reported results for the analysis has been technically reviewed and approved for release.

If you have any questions regarding these test results, please contact your Project Manager.



CLIENT: MT Dept of Transportation
Project: MDT WSS Maintenance Facility
Work Order: B24101170

Report Date: 11/06/24

CASE NARRATIVE

Fractionation without PAHs was added to the following sample(s) per client's request on 10/25/2024:

- B24101170-005 SB-19 (4-6)
- B24101170-015 SB-21 (2-5)
- B24101170-018 SB-22 (2-5)
- B24101170-022 Duplicate #2
- B24101170-023 Duplicate #3
- B24101170-026 Duplicate #6



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Chain of Custody & Analytical Request Record

www.energylab.com

Account Information (Billing information)

Company/Name <u>Montana Department of Transportation</u>		
Contact <u>Kendall Gustafson</u>		
Phone <u>406-461-2193</u>		
Mailing Address <u>2701 Prospect Avenue</u>		
City, State, Zip <u>Helena, MT 59620</u>		
Email <u>kgustafson@mt.gov</u>		
Receive Invoice <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> Email	Receive Report <input type="checkbox"/> Hard Copy <input type="checkbox"/> Email	
Purchase Order	Quote	Bottle Order <u>187513</u>

Report Information (if different than Account Information)

Company/Name <u>Pioneer Technical Services</u>		
Contact <u>Robyn Sargent</u>		
Phone <u>406-545-4805</u>		
Mailing Address <u>2310 Broadwater Ave., Ste 1</u>		
City, State, Zip <u>Billings, MT 59102</u>		
Email <u>rsargent@pioneer-technical.com</u>		
Receive Report <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> Email		
Special Report/Formats: <input type="checkbox"/> LEVEL IV <input type="checkbox"/> NELAC <input type="checkbox"/> EDD/EDT (contact laboratory) <input type="checkbox"/> Other _____		

Comments

If EPH Screen exceeds 200 mg/kg, please fractionate

Project Information

Project Name, PWSID, Permit, etc. <u>MDT WSS Maintenance Facility</u>	
Sampler Name <u>Robyn Sargent</u>	Sampler Phone <u>214.662.3528</u>
Sample Origin State <u>MT</u>	EPA/State Compliance <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
URANIUM MINING CLIENTS MUST indicate sample type <input type="checkbox"/> Unprocessed Ore <input type="checkbox"/> Processed Ore (Ground or Refined) **CALL BEFORE SENDING <input type="checkbox"/> 11(e)2 Byproduct Material (Can ONLY be Submitted to ELI Casper Location)	

Matrix Codes

- A - Air
- W - Water
- S - Soils/Solids
- V - Vegetation
- B - Bioassay
- O - Oil
- DW - Drinking Water

Analysis Requested

Sample ID	Matrix	Analysis	Analysis	Analysis	Analysis	Analysis	Analysis	Analysis	Analysis	Analysis
3 1	MW-7 (15-18)	VPH	EPH Screen	Lead Scavengers	EDB + 1,2-DC4					
4 2	MW-7 (18-20)	X	X	X						
3 3	SB-18 (10-12)	X	X	X						
1 4	SB-18 (14-15)	X	X	X						
3 5	SB-19 (4-6)	X	X	X						
3 6	SB-19 (8-10)	X	X	X						
1 7	SB-19 (16-18)	X	X	X						
2 8	MW-8 (5-7)	X	X	X						
2 9	MW-8 (12-14)	X	X	X						

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 Energy Laboratories MUST be contacted prior to RUSH sample submittal for charges and scheduling - See Instructions Page

ELI LAB ID

Laboratory Use Only

Bell101170

Sample Identification (Name, Location, Interval, etc.)	Collection		Number of Containers	Matrix (See Codes Above)
	Date	Time		
3 1 MW-7 (15-18)	10/9/24	1555	4	S
4 2 MW-7 (18-20)	10/9/24	1600	4	
3 3 SB-18 (10-12)	10/9/24	1230	4	
1 4 SB-18 (14-15)	10/9/24	1240	4	
3 5 SB-19 (4-6)	10/10/24	0805	4	
3 6 SB-19 (8-10)	10/10/24	0815	4	
1 7 SB-19 (16-18)	10/10/24	0825	4	
2 8 MW-8 (5-7)	10/10/24	0945	4	
2 9 MW-8 (12-14)	10/10/24	1010	4	

ELI is REQUIRED to provide preservative traceability. If the preservatives supplied with the bottle order were NOT used, please attach your preservative information with this COC.

Custody Record MUST be signed	Relinquished by (print) <u>Robyn Sargent</u>	Date/Time <u>10/11/24 1655</u>	Signature <u>[Signature]</u>	Received by (print)	Date/Time	Signature
	Relinquished by (print)	Date/Time	Signature	Received by Laboratory (print) <u>[Signature]</u>	Date/Time <u>10-11-24 1655</u>	Signature <u>[Signature]</u>
LABORATORY USE ONLY						
Shipped By	Cooler ID(s)	Custody Seals Y N C B	Intact Y N	Receipt Temp °C	Temp Blank Y N	On Ice Y N
Payment Type CC Cash Check			Amount \$	Receipt Number (cash/check only)		

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Chain of Custody & Analytical Request Record

www.energylab.com

Account Information (Billing information)

Company/Name <u>Montana Department of Transportation</u>		
Contact <u>Kendall Gustafson</u>		
Phone <u>406-461-2193</u>		
Mailing Address <u>2701 Prospect Avenue</u>		
City, State, Zip <u>Helena, MT 59620</u>		
Email <u>kgustafson@mt.gov</u>		
Receive Invoice <input type="checkbox"/> Hard Copy	<input checked="" type="checkbox"/> Email	Receive Report <input type="checkbox"/> Hard Copy <input type="checkbox"/> Email
Purchase Order	Quote	Bottle Order <u>187513</u>

Report Information (if different than Account Information)

Company/Name <u>Pioneer Technical Services</u>		
Contact <u>Robyn Sargent</u>		
Phone <u>406.545.4805</u>		
Mailing Address <u>2310 Broadwater Ave., Ste. 1</u>		
City, State, Zip <u>Billings, MT 59102</u>		
Email <u>rsargent@pioneer-technical.com</u>		
Receive Report <input type="checkbox"/> Hard Copy	<input checked="" type="checkbox"/> Email	
Special Report/Formats: <input type="checkbox"/> LEVEL IV <input type="checkbox"/> NELAC <input type="checkbox"/> EDD/EDT (contact laboratory) <input type="checkbox"/> Other _____		

Comments

If EPH Screen exceeds 200 mg/kg, Please fractionate

Project Information

Project Name, PWSID, Permit, etc <u>MDT WSS Maintenance Facility</u>	
Sampler Name <u>Robyn Sargent</u>	Sampler Phone <u>246.62.3528</u>
Sample Origin State <u>MT</u>	EPA/State Compliance <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
URANIUM MINING CLIENTS MUST indicate sample type <input type="checkbox"/> Unprocessed Ore <input type="checkbox"/> Processed Ore (Ground or Refined) **CALL BEFORE SENDING <input type="checkbox"/> 11(e)2 Byproduct Material (Can ONLY be Submitted to ELI Casper Location)	

Matrix Codes

- A - Air
- W - Water
- S - Soils/ Solids
- V - Vegetation
- B - Bioassay
- O - Oil
- DW - Drinking Water

Analysis Requested

Sample ID	Matrix	VPH	EPH Screen	Lead Scavengers	EDB+12-DCA													
1	MW-8 (18-20)	X	X	X														
2	MW-9 (8-10)	X	X	X														
3	MW-9 (16-18)	X	X	X														
4	SB-20 (8-10)	X	X	X														
5	SB-20 (12-15)	X	X	X														
6	SB-21 (2-5)	X	X	X														
7	SB-21 (10-12)	X	X	X														
8	SB-21 (18-20)	X	X	X														
9	SB-22 (2-5)	X	X	X														

All turnaround times are standard unless marked as RUSH.
 Energy Laboratories MUST be contacted prior to RUSH sample submittal for charges and scheduling - See Instructions Page

Sample Identification (Name, Location, Interval, etc.)	Collection		Number of Containers	Matrix (See Codes Above)	VPH	EPH Screen	Lead Scavengers	EDB+12-DCA	See Attached	RUSH TAT	ELI LAB ID Laboratory Use Only
	Date	Time									
1 MW-8 (18-20)	10/10/24	1030	4	S	X	X	X				B2410170
2 MW-9 (8-10)	10/10/24	1130	4		X	X	X				
3 MW-9 (16-18)	10/10/24	1150	4		X	X	X				
4 SB-20 (8-10)	10/10/24	1255	4		X	X	X				
5 SB-20 (12-15)	10/10/24	1315	4		X	X	X				
6 SB-21 (2-5)	10/10/24	1430	4		X	X	X				
7 SB-21 (10-12)	10/10/24	1445	4		X	X	X				
8 SB-21 (18-20)	10/10/24	1455	4		X	X	X				
9 SB-22 (2-5)	10/10/24	1540	4		X	X	X				

ELI is REQUIRED to provide preservative traceability. If the preservatives supplied with the bottle order were NOT used, please attach your preservative information with this COC.

Custody Record MUST be signed	Relinquished by (print) <u>Robyn Sargent</u>	Date/Time <u>10/11/24 1655</u>	Signature <u>[Signature]</u>	Received by (print)	Date/Time	Signature			
	Relinquished by (print)	Date/Time	Signature	Received by Laboratory (print) <u>[Signature]</u>	Date/Time <u>10-11-24 1655</u>	Signature <u>[Signature]</u>			
LABORATORY USE ONLY									
Shipped By	Cooler ID(s)	Custody Seals Y N C B	Intact Y N	Receipt Temp °C	Temp Blank Y N	On Ice Y N	Payment Type CC Cash Check	Amount \$	Receipt Number (cash/check only)

In certain circumstances, samples submitted to Energy Laboratories, Inc. may be subcontracted to other certified laboratories in order to complete the analysis requested. This serves as notice of this possibility. All subcontracted data will be clearly notated on your analytical report.



Chain of Custody & Analytical Request Record

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Account Information (Billing information)

Company/Name <u>Montana Department of Transportation</u>		
Contact <u>Kendall Gustafson</u>		
Phone <u>406-461-2193</u>		
Mailing Address <u>2701 Prospect Ave</u>		
City, State, Zip <u>Helena, MT 59620</u>		
Email <u>kgustafson@mt.gov</u>		
Receive Invoice <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> Email	Receive Report <input type="checkbox"/> Hard Copy <input type="checkbox"/> Email	
Purchase Order	Quote	Bottle Order <u>187513</u>

Report Information (if different than Account Information)

Company/Name <u>Pioneer Technical Services</u>		
Contact <u>Robyn Sargent</u>		
Phone <u>406-545-4805</u>		
Mailing Address <u>2310 Broadwater Ave., Ste 1</u>		
City, State, Zip <u>Billings, MT 59102</u>		
Email <u>rsargent@pioneer-technical.com</u>		
Receive Report <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> Email		
Special Report/Formats: <input type="checkbox"/> LEVEL IV <input type="checkbox"/> INELAC <input type="checkbox"/> EDD/EDT (contact laboratory) <input type="checkbox"/> Other _____		

Comments

If EPH Screen exceeds 200ng/kg, please fractionate

Project Information

Project Name, PWSID, Permit, etc. <u>MDTWSS Maintenance Facility</u>	
Sampler Name <u>Robyn Sargent</u>	Sampler Phone <u>214.662.3528</u>
Sample Origin State <u>MT</u>	EPA/State Compliance <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
URANIUM MINING CLIENTS MUST indicate sample type <input type="checkbox"/> Unprocessed Ore <input type="checkbox"/> Processed Ore (Ground or Refined) **CALL BEFORE SENDING <input type="checkbox"/> 11(e)2 Byproduct Material (Can ONLY be Submitted to ELI Casper Location)	

Matrix Codes

- A - Air
- W - Water
- S - Soils/Solids
- V - Vegetation
- B - Bioassay
- O - Oil
- DW - Drinking Water

Analysis Requested

Sample ID	Matrix	Analysis	Analysis	Analysis	Analysis	Analysis	Analysis	Analysis	Analysis	Analysis
1	S	VPH	EPH Screen	Lead Scavengers	EDB + 1/2-DCA					
2	S	X	X	X						
3	S	X	X	X						
4	S	X	X	X						
5	S	X	X	X						
6	S	X	X	X						
7	S	X	X	X						
8	S	X	X	X						

All turnaround times are standard unless marked as RUSH.
 Energy Laboratories MUST be contacted prior to RUSH sample submittal for charges and scheduling - See Instructions Page

Sample Identification (Name, Location, Interval, etc.)	Collection		Number of Containers	Matrix (See Codes Above)	Analysis Requested										See Attached	RUSH TAT	ELI LAB ID Laboratory Use Only
	Date	Time															
1 SB-22 (7.5-10)	10/10/24	1605	4	S	X	X	X										B24101170
2 SB-23 (7-10)	10/10/24	1720	4	S	X	X	X										
3 Duplicate #1	10/9/24	10/10/24	4	S	X	X	X										
4 Duplicate #2	10/10/24		4	S	X	X	X										
5 Duplicate #3	10/10/24		4	S	X	X	X										
6 Duplicate #4	10/10/24		4	S	X	X	X										
7 Duplicate #5	10/10/24		4	S	X	X	X										
8 Duplicate #6	10/10/24		4	S	X	X	X										

ELI is REQUIRED to provide preservative traceability. If the preservatives supplied with the bottle order were NOT used, please attach your preservative information with this COC.

Custody Record MUST be signed	Relinquished by (print) <u>Robyn Sargent</u>	Date/Time <u>10/14/24 1655</u>	Signature <u>[Signature]</u>	Received by (print)	Date/Time	Signature			
	Relinquished by (print)	Date/Time	Signature	Received by Laboratory (print) <u>Marie Mack</u>	Date/Time <u>10/24/24 1655</u>	Signature <u>[Signature]</u>			
LABORATORY USE ONLY									
Shipped By	Cooler ID(s)	Custody Seals Y N C B	Intact Y N	Receipt Temp °C	Temp Blank Y N	On Ice Y N	Payment Type CC Cash Check	Amount \$	Receipt Number (cash/check only)

In certain circumstances, samples submitted to Energy Laboratories, Inc. may be subcontracted to other certified laboratories in order to complete the analysis requested. This serves as notice of this possibility. All subcontracted data will be clearly notated on your analytical report.



ANALYTICAL SUMMARY REPORT

March 25, 2025

MT Dept of Transportation
PO Box 201001
Helena, MT 59620-1001

Work Order: H25030209

Project Name: MDT WSS Maintenance Facility

Energy Laboratories Inc Helena MT received the following 18 samples for MT Dept of Transportation on 3/6/2025 for analysis.

Lab ID	Client Sample ID	Collect Date	Receive Date	Matrix	Test
H25030209-001	MW-10 [5-7]	03/04/25 13:00	03/06/25	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Percent Moisture EDB & EDC in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
H25030209-002	MW-10 [12.5-14.5]	03/04/25 13:30	03/06/25	Soil	Same As Above
H25030209-003	MW-10 [20-22]	03/04/25 14:15	03/06/25	Soil	Same As Above
H25030209-004	MW-11 [2.5-4.5]	03/05/25 8:30	03/06/25	Soil	Same As Above
H25030209-005	MW-11 [12.5-14.5]	03/05/25 9:15	03/06/25	Soil	Same As Above
H25030209-006	MW-11 [20-22]	03/05/25 10:00	03/06/25	Soil	Same As Above
H25030209-007	Dupe	03/05/25 8:30	03/06/25	Soil	Same As Above
H25030209-008	Dupe	03/04/25 13:00	03/06/25	Soil	Same As Above
H25030209-009	MW-12 [10-12]	03/05/25 11:45	03/06/25	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 EPH-Fractionation Hydrocarbons, Aliphatic Extractable Petroleum Hydrocarbons, Aromatic Extractable Petroleum Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Percent Moisture EDB & EDC in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List



ANALYTICAL SUMMARY REPORT

H25030209-010	MW-12 [15-17]	03/05/25 12:30	03/06/25	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Percent Moisture EDB & EDC in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
H25030209-011	MW-12 [20-22]	03/05/25 13:00	03/06/25	Soil	Same As Above
H25030209-012	SB-24 [5-7]	03/05/25 15:30	03/06/25	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 EPH-Fractionation Hydrocarbons, Aliphatic Extractable Petroleum Hydrocarbons, Aromatic Extractable Petroleum Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Percent Moisture EDB & EDC in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
H25030209-013	SB-24 [10-12]	03/05/25 15:45	03/06/25	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Percent Moisture EDB & EDC in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
H25030209-014	SB-24 [20-22]	03/05/25 16:15	03/06/25	Soil	Same As Above
H25030209-015	SB-25 [7.5-9.5]	03/06/25 8:30	03/06/25	Soil	Same As Above
H25030209-016	SB-25 [12.5-14.5]	03/06/25 9:00	03/06/25	Soil	EPH-Ultrasonic Extraction SW3550C Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Percent Moisture EDB & EDC in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List



ANALYTICAL SUMMARY REPORT

H25030209-017	SB-25 [20-22]	03/06/25 9:45	03/06/25	Soil	EPH-Ultrasonic Extraction SW3550C Methanol Extraction for Volatiles SW5035 Hydrocarbons, Extractable Petroleum-Scrn Volatile Petroleum Hydrocarbons Percent Moisture EDB & EDC in soil by ECD Prep SW8011 for EDB & EDC by ECD Volatile Organics, Methanol Extraction SW5035 8260-VOCs, Low Level - Short List
H25030209-018	Trip Blank T2	03/04/25 13:00	03/06/25	Trip Blank	Methanol Extraction for Volatiles SW5035 Volatile Petroleum Hydrocarbons

The analyses presented in this report were performed by Energy Laboratories, Inc., 3161 E. Lyndale Ave., Helena, MT 59604, unless otherwise noted. Any exceptions or problems with the analyses are noted in the report package. Any issues encountered during sample receipt are documented in the Work Order Receipt Checklist.

The results as reported relate only to the item(s) submitted for testing. This report shall be used or copied only in its entirety. Energy Laboratories, Inc. is not responsible for the consequences arising from the use of a partial report.

Energy Laboratories, Inc. verifies the reported results for the analysis has been technically reviewed and approved for release.

If you have any questions regarding these test results, please contact your Project Manager.



CLIENT: MT Dept of Transportation
Project: MDT WSS Maintenance Facility
Work Order: H25030209

Report Date: 03/25/25

CASE NARRATIVE

Tests associated with analyst identified as ELI-B were subcontracted to Energy Laboratories, 1120 S. 27th St., Billings, MT, EPA Number MT00005.

Prep Comments for Sample H25030209-001B, Test VOC-5035A: The prep hold time was exceeded by 0.140 days.

Prep Comments for Sample H25030209-002B, Test VOC-5035A: The prep hold time was exceeded by 0.119 days.

Prep Comments for Sample H25030209-003B, Test VOC-5035A: The prep hold time was exceeded by 0.0882 days.

Prep Comments for Sample H25030209-008B, Test VOC-5035A: The prep hold time was exceeded by 0.140 days.

The VPH vial for sample SB-25 (12.5-14.5) was received with low methanol. Proceed with lab extraction past 48 hour hold per email from Robyn Sargent on 03/10/25. TKJ 03/10/25

Samples MW-12 and SB-24 were over the MCL for EPH Screen. Proceeded with fractionation without PAHs per email from Robyn Sargent on 03/17/25. TKJ 03/17/25

Matrix Spike Duplicate quality control sample was turned off for EPH Frac Prep Batch 76713 due to sample evaporation causing the sample between screen analysis and frac preparation to be compromised. KMH 3/25/25



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Page 1 of 2

Account Information (Billing information)			Report Information (if different than Account Information)			Comments <i>If EPH Screen exceeds 200 mg/kg, please fractionate</i>
Company/Name <i>Montana Department of Transportation</i>			Company/Name <i>Pioneer Technical Services</i>			
Contact <i>Kendall Gustafson</i>			Contact <i>Robyn Sargent</i>			
Phone <i>406-461-2193</i>			Phone <i>406-545-4805</i>			
Mailing Address <i>2701 Prospect Avenue</i>			Mailing Address <i>2310 Broadwater Ave, Ste 1</i>			
City, State, Zip <i>Helena, MT, 59620</i>			City, State, Zip <i>Billings, MT, 59102</i>			
Email <i>kgustafson@MT.Gov</i>			Email <i>rsargent@Pioneer-technical.com</i>			
Receive Invoice	<input type="checkbox"/> Hard Copy	<input checked="" type="checkbox"/> Email	Receive Report	<input type="checkbox"/> Hard Copy	<input checked="" type="checkbox"/> Email	
Purchase Order	Quote	Bottle Order	Special Report/Formats:			
		<i>187513</i>	<input type="checkbox"/> LEVEL IV <input type="checkbox"/> NELAC <input type="checkbox"/> EDD/EDT (contact laboratory) <input type="checkbox"/> Other			

Project Information			Matrix Codes		Analysis Requested								See Attached	RUSH TAT	ELI LAB ID <i>LA5030 209</i>				
Project Name, PWSID, Permit, etc. <i>MDT WSS Maintenance Fac</i>			A - Air	W - Water												All turnaround times are standard unless marked as RUSH. Energy Laboratories MUST be contacted prior to RUSH sample submittal for charges and scheduling - See Instructions Page			
Sampler Name <i>Damon Taylor</i> Sampler Phone <i>406-439-0226</i>			S - Soils/Solids	V - Vegetation									URANIUM MINING CLIENTS MUST indicate sample type <input type="checkbox"/> Unprocessed Ore <input type="checkbox"/> Processed Ore (Ground or Refined) **CALL BEFORE SENDING <input type="checkbox"/> 11(e)2 Byproduct Material (Can ONLY be Submitted to ELI Casper Location)						
Sample Origin State <i>MT</i> EPA/State Compliance <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			B - Bioassay	O - Oil												Cooler #2			
			DW - Drinking Water										9						
Sample Identification <small>(Name, Location, Interval, etc.)</small>		Collection <small>Date Time</small>		Number of Containers	Matrix <small>(See Codes Above)</small>														
<i>TI</i>	<i>1 MW-10 (5-7)</i>	<i>3/4/25</i>	<i>1300</i>	<i>4</i>	<i>S</i>	<i>X</i>	<i>X</i>	<i>X</i>											
<i>TI</i>	<i>2 MW-10 (12.5-14.5)</i>	<i>3/4/25</i>	<i>1330</i>	<i>4</i>	<i>S</i>	<i>X</i>	<i>X</i>	<i>X</i>											
<i>TI</i>	<i>3 MW-10 (20-22)</i>	<i>3/4/25</i>	<i>1415</i>	<i>4</i>	<i>S</i>	<i>X</i>	<i>X</i>	<i>X</i>											
<i>TI</i>	<i>4 MW-11 (2.5-4.5)</i>	<i>3/4/25</i>	<i>0830</i>	<i>4</i>	<i>S</i>	<i>X</i>	<i>X</i>	<i>X</i>											
<i>TI</i>	<i>5 MW-11 (12.5-14.5)</i>	<i>3/5/25</i>	<i>0915</i>	<i>4</i>	<i>S</i>	<i>X</i>	<i>X</i>	<i>X</i>											
<i>TI</i>	<i>6 MW-11 (20-22)</i>	<i>3/5/25</i>	<i>1000</i>	<i>4</i>	<i>S</i>	<i>X</i>	<i>X</i>	<i>X</i>											
<i>TI</i>	<i>7 Dupe</i>	<i>3/5/25</i>		<i>4</i>	<i>S</i>	<i>X</i>	<i>X</i>	<i>X</i>											
<i>TI</i>	<i>8 Dupe</i>	<i>3/4/25</i>		<i>4</i>	<i>S</i>	<i>X</i>	<i>X</i>	<i>X</i>											

ELI is REQUIRED to provide preservative traceability. If the preservatives supplied with the bottle order were NOT used, please attach your preservative information with this COC.

Custody Record MUST be signed	Relinquished by (print)	Date/Time	Signature	Received by (print)	Date/Time	Signature
		<i>Damon Taylor</i>	<i>3/6/25 11:30</i>	<i>Damon Taylor</i>	<i>Nevada Strandberg</i>	<i>3/6/25 11:30</i>
	<i>Nevada Strandberg</i>	<i>3/6/25 1305</i>	<i>Nevada Strandberg</i>	Received by Laboratory (print)	Date/Time	Signature
				<i>Nevada Strandberg</i>	<i>3/6/25 1305</i>	<i>Nevada Strandberg</i>

LABORATORY USE ONLY									
Shipped By	Cooler ID(s)	Custody Seals	Intact	Receipt Temp	Temp Blank	On Ice	Payment Type	Amount	Receipt Number (cash/check only)
<i>h-dal</i>	<i>Y</i>	<i>N</i>	<i>N</i>	<i>01-0.6</i>	<i>N</i>	<i>Y</i>	<i>CC</i>		

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Trust our People. Trust our Data.

Chain of Custody & Analytical Request Record

www.energylab.com

Account Information (Billing information)			Report Information (if different than Account Information)			Comments	
Company/Name <u>Montana Department of Transportation</u>			Company/Name <u>Pioneer Technical Services</u>				<u>Same as first page</u>
Contact <u>Kendall Gustafson</u>			Contact <u>Robyn Sargent</u>				
Phone <u>406-461-2193</u>			Phone <u>406-545-4805</u>				
Mailing Address <u>2701 Prospect Avenue</u>			Mailing Address <u>2310 Billings Broadwater Ave Ste 1</u>				
City, State, Zip <u>Helena, MT, 59620</u>			City, State, Zip <u>Billings, MT, 59102</u>				
Email <u>Kgustafson@mt.gov</u>			Email <u>rsargent@pioneer-technical.com</u>				
Receive Invoice <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> Email			Receive Report <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> Email				
Purchase Order		Quote	Bottle Order				
			<u>187513</u>				
Special Report/Formats: <input type="checkbox"/> LEVEL IV <input type="checkbox"/> NELAC <input type="checkbox"/> EDD/EDT (contact laboratory) <input type="checkbox"/> Other _____							

Project Information				Matrix Codes		Analysis Requested							See Attached	RUSH TAT	ELI LAB ID Laboratory Use Only	
Project Name, PWSID, Permil, etc. <u>MDT WSS Maintenance Facility</u>				A - Air												All turnaround times are standard unless marked as RUSH. Energy Laboratories MUST be contacted prior to RUSH sample submittal for charges and scheduling - See Instructions Page
Sampler Name <u>Damon Taylor</u>		Sampler Phone <u>406-439-0220</u>		W - Water												
Sample Origin State <u>MT</u>		EPA/State Compliance <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		S - Soils/Solids												
URANIUM MINING CLIENTS MUST indicate sample type				V - Vegetation									See Attached	RUSH TAT	ELI LAB ID Laboratory Use Only	
<input type="checkbox"/> Unprocessed Ore <input type="checkbox"/> Processed Ore (Ground or Refined) **CALL BEFORE SENDING <input type="checkbox"/> 11(e)2 Byproduct Material (Can ONLY be Submitted to ELI Casper Location)				B - Bioassay												
Sample Identification (Name, Location, Interval, etc.)			Collection		Number of Containers	Matrix (See Codes Above)	Analysis Requested							See Attached	RUSH TAT	ELI LAB ID Laboratory Use Only
			Date	Time												
<u>T1</u>	<u>MW-12 (10-12)</u>	<u>3/5/25</u>	<u>11:45</u>	<u>4</u>	<u>S</u>	<u>X</u>	<u>X</u>	<u>X</u>								
<u>T2</u>	<u>MW-12 (15-17)</u>	<u>3/5/25</u>	<u>12:30</u>			<u>X</u>	<u>X</u>	<u>X</u>								
<u>T3</u>	<u>MW-12 (20-22)</u>	<u>3/5/25</u>	<u>13:00</u>			<u>X</u>	<u>X</u>	<u>X</u>								
<u>T4</u>	<u>SB-24 (5-7)</u>	<u>3/5/25</u>	<u>15:30</u>			<u>X</u>	<u>X</u>	<u>X</u>								
<u>T5</u>	<u>SB-24 (10-12)</u>	<u>3/5/25</u>	<u>15:45</u>			<u>X</u>	<u>X</u>	<u>X</u>								
<u>T6</u>	<u>SB-24 (20-22)</u>	<u>3/5/25</u>	<u>16:15</u>			<u>X</u>	<u>X</u>	<u>X</u>								
<u>T7</u>	<u>SB-25 (7.5-9.5)</u>	<u>3/6/25</u>	<u>0830</u>			<u>X</u>	<u>X</u>	<u>X</u>								
<u>T8</u>	<u>SB-25 (12.5-14.5)</u>	<u>3/6/25</u>	<u>0900</u>			<u>X</u>	<u>X</u>	<u>X</u>								
<u>T9</u>	<u>SB-25 (20-22)</u>	<u>3/6/25</u>	<u>0945</u>			<u>X</u>	<u>X</u>	<u>X</u>								

ELI is REQUIRED to provide preservative traceability. If the preservatives supplied with the bottle order were NOT used, please attach your preservative information with this COC.

Custody Record MUST be signed	Relinquished by (print)		Date/Time		Signature		Received by (print)		Date/Time		Signature	
		<u>Damon Taylor</u>		<u>3/6/25 11:30</u>		<u>[Signature]</u>		<u>Nevada Strandberg</u>		<u>3/6/25 11:30</u>		<u>[Signature]</u>
	<u>Nevada Strandberg</u>		<u>3/6/25 1305</u>		<u>[Signature]</u>		<u>[Signature]</u>		<u>3-6-25 13</u>		<u>[Signature]</u>	
LABORATORY USE ONLY												
Shipped By <u>[Signature]</u>	Cooler ID(s) <u>1</u>	Custody Seals <u>(Y) N (C) B</u>	Intact <u>(Y) N</u>	Receipt Temp <u>21-0.29</u>	Temp Blank <u>(Y) N</u>	On Ice <u>(Y) N</u>	Payment Type <u>CC</u>	Cash	Check	Amount \$	Receipt Number (cash/check only)	

In certain circumstances, samples submitted to Energy Laboratories, Inc. may be subcontracted to other certified laboratories in order to complete the analysis requested. This serves as notice of this possibility. All subcontracted data will be clearly notated on your analytical report.



ANALYTICAL SUMMARY REPORT

December 06, 2024

MT Dept of Transportation
PO Box 201001
Helena, MT 59620-1001

Work Order: B24110499

Project Name: MDT WSS Maintenance Facility

Energy Laboratories Inc Billings MT received the following 9 samples for MT Dept of Transportation on 11/7/2024 for analysis.

Lab ID	Client Sample ID	Collect Date	Receive Date	Matrix	Test
B24110499-003	MW-3	11/06/24 13:50	11/07/24	Ground Water	Volatile Petroleum Hydrocarbons
B24110499-005	MW-5	11/06/24 14:30	11/07/24	Ground Water	Metals by ICP/ICPMS, Dissolved Alkalinity to pH 4.5 Carbon, Dissolved Inorganic EPH-Liquid-Liquid Extraction SW3520C Hydrocarbons, Extractable Petroleum Screen Headspace Gas Analysis Volatile Petroleum Hydrocarbons Anions by Ion Chromatography Nitrogen, Nitrite Nitrogen, Nitrate + Nitrite Nitrogen, Nitrate pH SW8011 Microextraction EDB in Water by ECD 8260-Volatile Organic Compounds-Short List
B24110499-006	MW-6	11/06/24 12:00	11/07/24	Ground Water	Metals by ICP/ICPMS, Dissolved Alkalinity to pH 4.5 Carbon, Dissolved Inorganic EPH-Liquid-Liquid Extraction SW3520C EPH Fractionation Hydrocarbons, Aliphatic Extractable Petroleum Hydrocarbons, Aromatic Extractable Petroleum Hydrocarbons, Extractable Petroleum Screen Headspace Gas Analysis Volatile Petroleum Hydrocarbons Anions by Ion Chromatography Nitrogen, Nitrite Nitrogen, Nitrate + Nitrite Nitrogen, Nitrate pH SW8011 Microextraction EDB in Water by ECD 8260-Volatile Organic Compounds-Short List



ANALYTICAL SUMMARY REPORT

B24110499-007	MW-7	11/06/24 13:15	11/07/24	Ground Water	Metals by ICP/ICPMS, Dissolved Alkalinity to pH 4.5 Carbon, Dissolved Inorganic EPH-Liquid-Liquid Extraction SW3520C Hydrocarbons, Extractable Petroleum Screen Headspace Gas Analysis Volatile Petroleum Hydrocarbons Anions by Ion Chromatography Nitrogen, Nitrite Nitrogen, Nitrate + Nitrite Nitrogen, Nitrate pH SW8011 Microextraction EDB in Water by ECD 8260-Volatile Organic Compounds-Short List
B24110499-008	MW-8	11/06/24 14:10	11/07/24	Ground Water	Volatile Petroleum Hydrocarbons
B24110499-010	Duplicate #1	11/06/24 14:30	11/07/24	Ground Water	Metals by ICP/ICPMS, Dissolved Alkalinity to pH 4.5 Carbon, Dissolved Inorganic EPH-Liquid-Liquid Extraction SW3520C Hydrocarbons, Extractable Petroleum Screen Headspace Gas Analysis Volatile Petroleum Hydrocarbons Anions by Ion Chromatography Nitrogen, Nitrite Nitrogen, Nitrate + Nitrite Nitrogen, Nitrate pH SW8011 Microextraction EDB in Water by ECD 8260-Volatile Organic Compounds-Short List
B24110499-012	Trip Blank 1	11/06/24 13:50	11/07/24	Trip Blank	Volatile Petroleum Hydrocarbons
B24110499-013	Trip Blank 2	11/06/24 14:30	11/07/24	Trip Blank	Same As Above
B24110499-014	Trip Blank 3	11/06/24 12:00	11/07/24	Trip Blank	Same As Above

The analyses presented in this report were performed by Energy Laboratories, Inc., 1120 So. 27th Street, Billings, MT 59101, unless otherwise noted. Any exceptions or problems with the analyses are noted in the report package. Any issues encountered during sample receipt are documented in the Work Order Receipt Checklist.

The results as reported relate only to the item(s) submitted for testing. This report shall be used or copied only in its entirety. Energy Laboratories, Inc. is not responsible for the consequences arising from the use of a partial report.

Energy Laboratories, Inc. verifies the reported results for the analysis has been technically reviewed and approved for release.

If you have any questions regarding these test results, please contact your Project Manager.



CLIENT: MT Dept of Transportation
Project: MDT WSS Maintenance Facility
Work Order: B24110499

Report Date: 12/06/24

CASE NARRATIVE

Fractionation without PAHs was added to the following sample(s) on 11/19/2024 per client instructions:

B24110499-006E MW-6



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Chain of Custody (COC) & Analytical Request Record

Lab Workorder #: **B24110499**

Project Information		Laboratory Use	
Client: MT Dept of Transportation	Quote: N/A	Critical Hold Time: 48 Hours	
Project: MDT WSS Maintenance Facility	BO#: 189303	# of Samples: 12	
Purchase Order:	EE#: 63992	Matrix: Ground Water	
Contact/Phone: Kendall Gustafson (406) 461-2193	Turn-Around Time: Standard		

Comments: Dissolved metals will be field filtered and then preserved with HNO3. Dissolved Inorganic Carbon should be field filtered and unpreserved. Copy of results to: Pioneer Technical Services, Robyn Sargent, rsargent@pioneer-technical.com

Analysis Requested

Hold Time (Days)	14	28	2	Fld	180	28	28	28	14	14	14	14	14
# of Containers													
Matrix													
RUSH TAT													
Alkalinity to pH 4.5 (A2320 B)													
Anions by Ion Chromatography (E300.0)													
Nitrogen, Nitrite (E353.2)													
pH (A4500-H B)													
Metals by ICP/ICPMS, Dissolved (E200.7_8)													
Nitrogen, Nitrate + Nitrite (E353.2)													
Nitrogen, Nitrate (Calculation)													
Carbon, Dissolved Inorganic (A5310 C)													
Hydrocarbons, Extractable Petroleum Screen (SW8015M)													
Headspace Gas Analysis (SW8015M)													
Volatile Petroleum Hydrocarbons (MA-VPH)													
EDB in Water by ECD (SW8011)													
8260-Volatile Organic Compounds-Short List (SW8260D)													

	Sample Identification	Collection Date/Time	# of Containers	Matrix	RUSH TAT	Alkalinity to pH 4.5 (A2320 B)	Anions by Ion Chromatography (E300.0)	Nitrogen, Nitrite (E353.2)	pH (A4500-H B)	Metals by ICP/ICPMS, Dissolved (E200.7_8)	Nitrogen, Nitrate + Nitrite (E353.2)	Nitrogen, Nitrate (Calculation)	Carbon, Dissolved Inorganic (A5310 C)	Hydrocarbons, Extractable Petroleum Screen (SW8015M)	Headspace Gas Analysis (SW8015M)	Volatile Petroleum Hydrocarbons (MA-VPH)	EDB in Water by ECD (SW8011)	8260-Volatile Organic Compounds-Short List (SW8260D)	
1	MW-1		17	W		X	X	X	X	X	X	X	X	X	X	X	X	X	X
2	MW-2		17	W		X	X	X	X	X	X	X	X	X	X	X	X	X	X
3	MW-3	11/6/24 1350	3	X	W	X	X	X	X	X	X	X	X	X	X	X	X	X	X
4	MW-4		17	W		X	X	X	X	X	X	X	X	X	X	X	X	X	X
5	MW-5	11/6/24 1430	3	X	W	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6	MW-6	11/6/24 1200	17	W		X	X	X	X	X	X	X	X	X	X	X	X	X	X
7	MW-7	11/6/24 1315	17	W		X	X	X	X	X	X	X	X	X	X	X	X	X	X
8	MW-8	11/6/24 1410	17	W		X	X	X	X	X	X	X	X	X	X	X	X	X	X
9	MW-9		17	W		X	X	X	X	X	X	X	X	X	X	X	X	X	X
10	Duplicate #1	11/6/24 1430	17	W		X	X	X	X	X	X	X	X	X	X	X	X	X	X
11	Duplicate #2		17	W		X	X	X	X	X	X	X	X	X	X	X	X	X	X

Date Printed: 10/30/2024

EE: BL - 63992

COC: Page 1 of 2



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Chain of Custody (COC) & Analytical Request Record

Client: MT Dept of Transportation

MDT WSS Maintenance Facility

Lab Workorder #: **B24110499**

Comments: Dissolved metals will be field filtered and then preserved with HNO3. Dissolved Inorganic Carbon should be field filtered and unpreserved. Copy of results to: Pioneer Technical Services Robyn Sargent rsargent@pioneer-technical.com			Analysis Requested																
			Hold Time (Days)	14	28	2	Fld	180	28	28	28	14	14	14	14	14			
Contact ELI prior to RUSH sample submittal for charges, availability & scheduling. Samples submitted may be subcontracted to other laboratories to complete the test(s) requested; this will be clearly noted on the analytical report.			# of Containers	Matrix	RUSH TAT	Alkalinity to pH 4.5 (A2320 B)	Anions by Ion Chromatography (E300.0)	Nitrogen, Nitrite (E353.2)	pH (A4500-H B)	Metals by ICP/ICPMS, Dissolved (E200.7_8)	Nitrogen, Nitrate + Nitrite (E353.2)	Nitrogen, Nitrate (Calculation)	Carbon, Dissolved Inorganic (A5310 C)	Hydrocarbons, Extractable Petroleum Screen (SW8015M)	Headspace Gas Analysis (SW8015M)	Volatile Petroleum Hydrocarbons (MA-VPH)	EDB in Water by ECD (SW8011)	8260-Volatile Organic Compounds-Short List (SW8260D)	
			Sample Identification	Collection Date/Time															
12	Trip Blank		1	W												X			
13																			
14																			
15																			
16																			
17																			
18																			
19																			
20																			
21																			
22																			
23																			
24																			
25																			
26																			
27																			

Custody Record MUST be signed	Lab provided preservatives were used <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Sampler Name (if different than Relinquished by):			Sampler Phone: 406-855-7360		
	Relinquished by (print) <i>Taylor Bienvenue</i>	Date/Time <i>11/7/24 10:17</i>	Signature <i>[Signature]</i>	Received by (print)		Date/Time	Signature	
	Relinquished by (print)	Date/Time	Signature	Received by Laboratory (print) <i>Kyle Heston</i>		Date/Time <i>11-07-24 10:17</i>	Signature <i>[Signature]</i>	

Date Printed: 10/30/2024

EE: BL - 63992

COC: Page 2 of 2



ANALYTICAL SUMMARY REPORT

December 16, 2024

MT Dept of Transportation
PO Box 201001
Helena, MT 59620-1001

Work Order: B24111727

Project Name: MDT WSS Maintenance Facility

Energy Laboratories Inc Billings MT received the following 2 samples for MT Dept of Transportation on 11/22/2024 for analysis.

Lab ID	Client Sample ID	Collect Date	Receive Date	Matrix	Test
B24111727-001	MW-03	11/21/24 11:30	11/22/24	Aqueous	Metals by ICP/ICPMS, Dissolved Alkalinity to pH 4.5 Carbon, Dissolved Inorganic EPH-Liquid-Liquid Extraction SW3520C EPH Fractionation Hydrocarbons, Aliphatic Extractable Petroleum Hydrocarbons, Aromatic Extractable Petroleum Hydrocarbons, Extractable Petroleum Screen Headspace Gas Analysis Anions by Ion Chromatography Nitrogen, Nitrite Nitrogen, Nitrate + Nitrite Nitrogen, Nitrate pH SW8011 Microextraction EDB in Water by ECD 8260-Volatile Organic Compounds-Short List
B24111727-002	Trip Blank	11/21/24 11:30	11/22/24	Trip Blank	8260-Volatile Organic Compounds-Short List

The analyses presented in this report were performed by Energy Laboratories, Inc., 1120 So. 27th Street, Billings, MT 59101, unless otherwise noted. Any exceptions or problems with the analyses are noted in the report package. Any issues encountered during sample receipt are documented in the Work Order Receipt Checklist.

The results as reported relate only to the item(s) submitted for testing. This report shall be used or copied only in its entirety. Energy Laboratories, Inc. is not responsible for the consequences arising from the use of a partial report.

Energy Laboratories, Inc. verifies the reported results for the analysis has been technically reviewed and approved for release.

If you have any questions regarding these test results, please contact your Project Manager.



CLIENT: MT Dept of Transportation
Project: MDT WSS Maintenance Facility
Work Order: B24111727

Report Date: 12/16/24

CASE NARRATIVE

Tests associated with analyst identified as ELI-CA were subcontracted to Energy Laboratories, PO Box 247, Casper, WY, EPA Number WY00002.

Fractionation without PAHs was added to the following sample(s) per client's request on 12/05/2024:

B24111727-001 MW-03



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Chain of Custody & Analytical Request Record

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Account Information (Billing information)

Company/Name <u>Montana Dept of Transp</u>		
Contact <u>Kendall Gustafson</u>		
Phone <u>406-461-2193</u>		
Mailing Address <u>2701 Prospect Ave</u>		
City, State, Zip <u>Helena MT, 59620</u>		
Email <u>kgustafson@mt.gov</u>		
Receive Invoice <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> Email	Receive Report <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> Email	
Purchase Order	Quote	Bottle Order <u>187513</u>

Report Information (if different than Account Information)

Company/Name <u>Pioneer Technical Services</u>		
Contact <u>Robyn Sargent</u>		
Phone <u>406-545-4805</u>		
Mailing Address <u>2310 Broadwater Ave, Suite</u>		
City, State, Zip <u>Billings MT 59102</u>		
Email <u>rsargent@pioneer-technical.com</u>		
Receive Report <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> Email		
Special Report/Formats: <input type="checkbox"/> LEVEL IV <input type="checkbox"/> NELAC <input type="checkbox"/> EDD/EDT (contact laboratory) <input type="checkbox"/> Other _____		

Comments

If EPH Screen exceeds 200 mg/kg please fractionate
No UPH required

Project Information

Project Name, PWSID, Permit, etc. <u>MDT WSS Maintenance Proj</u>	
Sampler Name <u>Eli Costin</u>	Sampler Phone <u>406 927 6846</u>
Sample Origin State <u>MT</u>	EPA/State Compliance <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
URANIUM MINING CLIENTS MUST indicate sample type <input type="checkbox"/> Unprocessed Ore <input type="checkbox"/> Processed Ore (Ground or Refined) **CALL BEFORE SENDING <input type="checkbox"/> 11(e)2 Byproduct Material (Can ONLY be Submitted to ELI Casper Location)	

Matrix Codes

- A - Air
- W - Water
- S - Soils/Solids
- V - Vegetation
- B - Bioassay
- O - Oil
- DW - Drinking Water

Analysis Requested

- Alkalinity to pH 4.5 (A320 B)
- Anions by Ion Chromatography (E3)
- Nitrogen, Nitrate (E353.2)
- PH (A4500-H B)
- Metals by ICP/MS
- Dissolved (E200.7-B)
- Nitrogen + Nitrate + Nitrite (E353.2)
- Nitrogen, Nitrate (Calculation)
- Carbon, Dissolved
- Inorganic (A5310C)
- Hydro Carbon by Extractable
- Petroleum Screen (S1805PH)

All turnaround times are standard unless marked as RUSH.
Energy Laboratories MUST be contacted prior to RUSH sample submittal for charges and scheduling - See Instructions Page

Sample Identification (Name, Location, Interval, etc.)	Collection		Number of Containers	Matrix (See Codes Above)	Analysis Requested										RUSH TAT	ELI LAB ID Laboratory Use Only	
	Date	Time			Alkalinity to pH 4.5 (A320 B)	Anions by Ion Chromatography (E3)	Nitrogen, Nitrate (E353.2)	PH (A4500-H B)	Metals by ICP/MS	Dissolved (E200.7-B)	Nitrogen + Nitrate + Nitrite (E353.2)	Nitrogen, Nitrate (Calculation)	Carbon, Dissolved	Inorganic (A5310C)			Hydro Carbon by Extractable
1 MW-03	11/21/24	11:30	17	W	X	X	X	X	X	X	X	X	X	X	X	X	B24111727
2																	
3																	
4																	
5																	
6																	
7																	
8																	
9																	

ELI is REQUIRED to provide preservative traceability. If the preservatives supplied with the bottle order were NOT used, please attach your preservative information with this COC.

Custody Record MUST be signed	Relinquished by (print) <u>Eli Costin</u>	Date/Time <u>11/23/24 12:05</u>	Signature <u>Eli Costin</u>	Received by (print)	Date/Time	Signature			
	Relinquished by (print)	Date/Time	Signature	Received by Laboratory (print) <u>Cristal Jones</u>	Date/Time <u>11/24 12:05</u>	Signature			
LABORATORY USE ONLY									
Shipped By	Cooler ID(s)	Custody Seals Y N C B	Intact Y N	Receipt Temp °C	Temp Blank Y N	On Ice Y N	Payment Type CC Cash Check	Amount \$	Receipt Number (cash/check only)

In certain circumstances, samples submitted to Energy Laboratories, Inc. may be subcontracted to other certified laboratories in order to complete the analysis requested. This serves as notice of this possibility. All subcontracted data will be clearly notated on your analytical report.



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Chain of Custody & Analytical Request Record

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Account Information (Billing Information)

Company/Name	MT Dept of Transportation		
Contact	Kendall Gustafson		
Phone	406-461-2193		
Mailing Address	2701 Prospect Ave		
City, State, Zip	Helena MT, 59620		
Email	kgustafson@mt.gov		
Receive Invoice	<input type="checkbox"/> Hard Copy	<input checked="" type="checkbox"/> Email	Receive Report <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> Email
Purchase Order	Quote	Bottle Order	

Report Information (if different than Account Information)

Company/Name	Pioneer Technical Services		
Contact	Robyn Sargent		
Phone	406-545-4805		
Mailing Address	2310 Broadwater Ave St I		
City, State, Zip	Billings MT 59102		
Email	rsargent@pioneer-technical.com		
Receive Report	<input type="checkbox"/> Hard Copy	<input checked="" type="checkbox"/> Email	
Special Report/Formats:	<input type="checkbox"/> LEVEL IV <input type="checkbox"/> NELAC <input type="checkbox"/> EDD/EDT (contact laboratory) <input type="checkbox"/> Other		

Comments

See page 1

Project Information

Project Name, PWSID, Permit, etc.	MDT WSS Maintenance Facility		
Sampler Name	Eli Costin	Sampler Phone	406 927 6846
Sample Origin State	MT	EPA/State Compliance	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
URANIUM MINING CLIENTS MUST indicate sample type			
<input type="checkbox"/> Unprocessed Ore <input type="checkbox"/> Processed Ore (Ground or Refined) **CALL BEFORE SENDING <input type="checkbox"/> 11(e)2 Byproduct Material (Can ONLY be Submitted to ELI Casper Location)			

Matrix Codes

- A - Air
- W - Water
- S - Soils/Solids
- V - Vegetation
- B - Bioassay
- O - Oil
- DW - Drinking Water

Analysis Requested

Headspace Gas Analysis (SW 8015 M)
 EDB in water by ECD (SW 8011)
 B260 - Volatile Organic Compounds Short List (SW 8100)

All turnaround times are standard unless marked as RUSH. Energy Laboratories MUST be contacted prior to RUSH sample submittal for charges and scheduling - See Instructions Page

Sample Identification (Name, Location, Interval, etc.)	Collection		Number of Containers	Matrix (See Codes Above)	Analysis Requested										See Attached	RUSH TAT	ELI LAB ID Laboratory Use Only		
	Date	Time			1	2	3	4	5	6	7	8	9	10				11	12
1 MW-03	11/21/24	11:30	17	W	X	X	X												B24111727
2																			
3																			
4																			
5																			
6																			
7																			
8																			
9																			

ELI is REQUIRED to provide preservative traceability. If the preservatives supplied with the bottle order were NOT used, please attach your preservative information with this COC.

Custody Record MUST be signed	Relinquished by (print) Eli Costin	Date/Time 11/22/24 12:05	Signature <i>Eli Costin</i>	Received by (print)	Date/Time	Signature			
	Relinquished by (print)	Date/Time	Signature	Received by Laboratory (print) Amrita Jindal	Date/Time 11/22/24 12:05	Signature <i>Amrita Jindal</i>			
LABORATORY USE ONLY									
Shipped By	Cooler ID(s)	Custody Seals Y N C B	Intact Y N	Receipt Temp °C	Temp Blank Y N	On Ice Y N	Payment Type CC Cash Check	Amount \$	Receipt Number (cash/check only)

In certain circumstances, samples submitted to Energy Laboratories, Inc. may be subcontracted to other certified laboratories in order to complete the analysis requested. This serves as notice of this possibility. All subcontracted data will be clearly notated on your analytical report.



ANALYTICAL SUMMARY REPORT

April 07, 2025

MT Dept of Transportation
PO Box 201001
Helena, MT 59620-1001

Work Order: B25031219

Project Name: MDT WSS Maintenance Facility

Energy Laboratories Inc Billings MT received the following 5 samples for MT Dept of Transportation on 3/18/2025 for analysis.

Lab ID	Client Sample ID	Collect Date	Receive Date	Matrix	Test
B25031219-001	MW-12	03/17/25 13:36	03/18/25	Aqueous	Metals by ICP/ICPMS, Dissolved Alkalinity to pH 4.5 EPH-Liquid-Liquid Extraction SW3520C EPH Fractionation Hydrocarbons, Aliphatic Extractable Petroleum Hydrocarbons, Aromatic Extractable Petroleum Hydrocarbons, Extractable Petroleum Screen Headspace Gas Analysis Volatile Petroleum Hydrocarbons Anions by Ion Chromatography Nitrogen, Nitrite Nitrogen, Nitrate + Nitrite Nitrogen, Nitrate pH SW8011 Microextraction EDB in Water by ECD 8260-Volatile Organic Compounds-Short List
B25031219-002	MW-12 DUP	03/17/25 13:36	03/18/25	Aqueous	Same As Above
B25031219-003	MW-11	03/17/25 15:26	03/18/25	Aqueous	Same As Above
B25031219-004	Trip Blank 1	03/17/25 13:36	03/18/25	Aqueous	Volatile Petroleum Hydrocarbons
B25031219-005	Trip Blank 2	03/17/25 15:26	03/18/25	Aqueous	Same As Above

The analyses presented in this report were performed by Energy Laboratories, Inc., 1120 So. 27th Street, Billings, MT 59101, unless otherwise noted. Any exceptions or problems with the analyses are noted in the report package. Any issues encountered during sample receipt are documented in the Work Order Receipt Checklist.

The results as reported relate only to the item(s) submitted for testing. This report shall be used or copied only in its entirety. Energy Laboratories, Inc. is not responsible for the consequences arising from the use of a partial report.

Energy Laboratories, Inc. verifies the reported results for the analysis has been technically reviewed and approved for release.

If you have any questions regarding these test results, please contact your Project Manager.



CLIENT: MT Dept of Transportation
Project: MDT WSS Maintenance Facility
Work Order: B25031219

Report Date: 04/07/25

CASE NARRATIVE

Fractionation without PAHs was added to the following sample(s) per client instructions on 3/25/2025:

B24031219-001E MW-12

B24031219-002E MW-12 DUP

B24031219-003E MW-11



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Chain of Custody & Analytical Request Record

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Page 2 of 1

Account Information (Billing information)

Company/Name Montana Department of Transportation
 Contact Kendall Gustafson
 Phone 406-461-2193
 Mailing Address 2701 Prospect Ave.
 City, State, Zip Helena, MT 59620
 Email kgustafson@mt.gov
 Receive Invoice Hard Copy Email
 Receive Report Hard Copy Email
 Purchase Order Quote Bottle Order 192838

Report Information (if different than Account Information)

Company/Name Pioneer Technical Services
 Contact Robyn Sargent
 Phone 406-206-7066
 Mailing Address 2310 Broadwater Ave., Ste. 1
 City, State, Zip Billings, MT 59102
 Email rsargent@pioneer-technical.com
 Receive Report Hard Copy Email
 Special Report/Formats:
 LEVEL IV NELAC EDD/EDT (contact laboratory) Other _____

Comments

IP EPH Screen exceeds 1,000 ug/L, please fractionate

Project Information

Project Name, PWSID, Permit, etc. MDT WSS Maintenance Facility
 Sampler Name Eli Costin Sampler Phone 406 927 6846
 Sample Origin State MT EPA/State Compliance Yes No
URANIUM MINING CLIENTS MUST indicate sample type
 Unprocessed Ore
 Processed Ore (Ground or Refined) **CALL BEFORE SENDING
 11(e)2 Byproduct Material (Can ONLY be Submitted to ELI Casper Location)

Matrix Codes

- A - Air
- W - Water
- S - Soils/Solids
- V - Vegetation
- B - Bioassay
- O - Oil
- DW - Drinking Water

Analysis Requested

Analysis Requested	Analysis Requested	Analysis Requested	Analysis Requested	Analysis Requested	Analysis Requested	Analysis Requested	Analysis Requested	Analysis Requested	Analysis Requested
VPH	EPH Screen	Lead Scavengers	EDB + 1,2+BCA						

All turnaround times are standard unless marked as RUSH.
 Energy Laboratories MUST be contacted prior to RUSH sample submittal for charges and scheduling - See Instructions Page

Sample Identification (Name, Location, Interval, etc.)	Collection		Number of Containers	Matrix (See Codes Above)	Analysis Requested										See Attached	RUSH TAT	ELI LAB ID Laboratory Use Only
	Date	Time															
1 MW-12	3/17/25	13:36	17	W	X	X	X										B25031219
2 MW-12 DUP	3/17/25	13:36	17	↓	X	X	X										
3 MW-11	3/17/25	15:26	17	↓	X	X	X										
4 NFE 3/17/25																	
5																	
6																	
7																	
8																	
9																	

ELI is REQUIRED to provide preservative traceability. If the preservatives supplied with the bottle order were NOT used, please attach your preservative information with this COC.

Custody Record MUST be signed	Relinquished by (print) <u>Eli Costin</u>	Date/Time <u>3/17/25 19:35</u>	Signature <u>Eli Costin</u>	Received by (print) <u>Robyn Sargent</u>	Date/Time <u>3/17/25 19:35</u>	Signature <u>Robyn Sargent</u>
	Relinquished by (print) <u>Robyn Sargent</u>	Date/Time <u>3/18/25 11:44</u>	Signature <u>Robyn Sargent</u>	Received by Laboratory (print) <u>Kyle R. Stok</u>	Date/Time <u>03-18-25 11:40</u>	Signature <u>Kyle R. Stok</u>

LABORATORY USE ONLY									
Shipped By	Cooler ID(s)	Custody Seals Y N C B	Intact Y N	Receipt Temp °C	Temp Blank Y N	On Ice Y N	Payment Type CC Cash Check	Amount \$	Receipt Number (cash/check only)

In certain circumstances, samples submitted to Energy Laboratories, Inc. may be subcontracted to other certified laboratories in order to complete the analysis requested. This serves as notice of this possibility. All subcontracted data will be clearly notated on your analytical report.

RATIFICATION OF WEEKLY REIMBURSEMENTS

WEEKLY CLAIM REIMBURSEMENTS June 22, 2026, BOARD MEETING		
Week of	Number of Claims	Funds Reimbursed
4-15-26	27	\$146,479.01
4-29-26	26	\$245,607.88
5-6-26	31	\$148,119.43
5-20-26	22	\$207,127.71
5-27-26	17	\$75,369.11
Total	123	\$822,703.14



Petroleum Tank Release Compensation Board

Weekly Reimbursement Summary for 4/15/2026

Org Unit: 993050

Account: 67201

Claim ID	Facility ID	Release ID	Facility Name	City	Initial Claim	Reimbursement	Cumulative Reimb	Adjustments	Task Description
20250930O	3108719	6498	Town Pump Inc Superior	Superior	2/19/2025	\$1,795.00	\$30,430.95		Work Plan
20260126C	1605753	6598	Former Flying J Inc Belgrade	Belgrade	11/8/2024	\$9,246.25	\$134,684.89	\$394.20	Fieldwork
20251020J	3108719	6498	Town Pump Inc Superior	Superior	2/19/2025	\$15,844.82	\$30,430.95	\$110.00	Laboratory Analysis w/fee
20260217B	4203363	3606	Horizon Resources Fairview Store	Fairview	5/24/2001	\$5,481.90	\$71,164.84	\$2,428.27	Mobilization
20260202A	5605074	4416	Lockwood Interstate Exxon	Billings	12/18/2006	\$837.50	\$51,614.35	\$837.50	Report
20251020K	3108719	6498	Town Pump Inc Superior	Superior	2/19/2025	\$8,568.70	\$30,430.95		Report
20260202B	5605074	5058	Lockwood Interstate Exxon	Billings	1/12/2026	\$418.75	\$4,152.37	\$1,256.25	Report
20251126P	9995091	4729	Guaranteed Muffler Shop	Helena	2/17/2010	\$24,532.63	\$228,973.40	\$0.00	Soil Removal
20251229G	9995076	4681	Cross Petroleum Bulk Plant	Glendive	3/10/2009	\$500.00	\$576,745.01		GW Interim Data Submittal
20260120C	1507361	2697	Bigfork Outdoor Rentals Inc	Bigfork	2/27/1996	\$2,057.69	\$233,361.10	\$3,547.50	Report
20251128E	1509705	5036	CHS - Central	Kalispell	1/14/2016	\$3,761.74	\$293,013.44	\$2,441.51	Well Abandonment
20251229I	1105497	3807	Cenex Harvest States	Glendive	12/15/1999	\$500.00	\$427,198.98	\$774.00	GW Interim Data Submittal
20260120I	3108719	6498	Town Pump Inc Superior	Superior	2/19/2025	\$4,222.43	\$30,430.95		Soil Removal
20260120K	1506101	1850	Kelly Raes	Kalispell	9/30/1994	\$3,125.10	\$331,114.79		Monitoring
20260212A	1408711	5278	Town Pump Inc Lewistown	Lewistown	2/6/2019	\$5,973.64	\$174,589.22		Laboratory Analysis w/fee
20260219B	9995173	5093	Bennett Motors Parking Lot	Great Falls	11/20/2017	\$7,750.00	\$316,083.26	\$22.50	Report
20260219C	5607797	4744	Lynch Flying Service	Billings	11/18/2009	\$15,491.26	\$100,350.51		Well Installation
20260225B	2404530	873	Cenex Supply & Marketing Ronan	Ronan	7/27/1992	\$4,590.00	\$368,279.68		Laboratory Analysis w/fee
20260226G	5600062	5134	Caseys Corner 12	Billings	12/8/2025	\$4,444.50	\$8,287.29	\$7,407.49	Well Installation
20250908F	3301083	506	Roundup Car Care	Roundup	1/6/1992	\$4.20	\$317,393.23	\$882.00	Rem Sys Op & Maint
20260309F	5605861	3799	Pelican Oil Inc	Billings	4/21/2003	\$3,482.50	\$169,012.85		Laboratory Analysis w/fee
20260302G	206445	253	Hardin Auto Co	Hardin	1/25/1991	\$4,996.75	\$104,091.14		Report
20260302I	5600134	4480	Johnson Ford	Laurel	7/6/2006	\$3,055.00	\$29,722.29		Report

Wednesday, April 29, 2026

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Payment Reports _ Weekly Reimbursement by Date

Claim ID	Facility ID	Release ID	Facility Name	City	Initial Claim	Reimbursement	Cumulative Reimb	Adjustments	Task Description
20260120R	202296	2068	Big Horn County Road Dept	Hardin	6/9/2004	\$8,228.40	\$51,668.62		Report
20260120S	202296	2068	Big Horn County Road Dept	Hardin	6/9/2004	\$5,567.25	\$51,668.62		Laboratory Analysis w/fee
20260120T	202296	2068	Big Horn County Road Dept	Hardin	6/9/2004	\$1,028.00	\$51,668.62		Work Plan
20260121A	4708686	6541	Town Pump Inc Butte 8	Butte	3/10/2025	\$975.00	\$14,354.48	\$1,025.00	Laboratory Analysis w/fee

27 claims in the report

Total Reimbursement: \$146,479.01

Reviewed for Reimbursement by: *Ann R. Reest*

Date 4/30/2026

Approved for Reimbursement by: *Jerry Madenwith*

Date 5/12/2026



Petroleum Tank Release Compensation Board

Weekly Reimbursement Summary for 4/29/2026

Org Unit: 993050

Account: 67201

Claim ID	Facility ID	Release ID	Facility Name	City	Initial Claim	Reimbursement	Cumulative Reimb	Adjustments	Task Description
20260219A	4711251	539	Montana Agri Food Industrial Com	Butte	6/29/1990	\$1,339.56	\$346,782.56	\$100.00	Project Management
20260120J	1508709	2567	Town Pump Inc Kalispell 1	Kalispell	3/8/1996	\$28,213.38	\$209,698.23		Miscellaneous
20251216I	2906376	3803	Farmers Union Oil Co Circle	Circle	3/26/2001	\$333.90	\$228,875.57		Laboratory Analysis w/fee
20260317Q	3710231	4383	Valier Coop Supply	Valier	9/18/2007	\$52,801.28	\$465,346.72		Soil Removal
20251218C	1108663	1479	Norm & Rays Car Truckstop Inc	Glendive	10/7/1993	\$2,615.00	\$428,628.77		Report
20260226A	5003596	1469	Mountain View Coop Fairfield	Fairfield	9/27/1994	\$3,701.60	\$258,205.62	\$3,015.30	Work Plan
20260226B	5003596	4385	Mountain View Coop Fairfield	Fairfield	3/8/2013	\$925.40	\$71,379.29	\$753.83	Work Plan
20260302A	4708686	6541	Town Pump Inc Butte 8	Butte	3/10/2025	\$6,010.15	\$14,354.48	\$6,120.14	Laboratory Analysis w/fee
20260302B	907081	6705	Town Pump Inc Miles City	Miles City	12/29/2025	\$10,822.40	\$116,705.07	\$406.00	Rem Sys Install
20260302C	1613115	6694	Blue Basket #4	Bozeman	1/13/2026	\$9,555.07	\$13,834.64	\$9,610.08	Well Installation
20260302F	4204828	3053	Richland County S Ellery	Fairview	5/6/1999	\$5,145.67	\$99,059.71		Report
20260309B	4709420	813	Cenex Petroleum Inc Butte	Butte	3/3/1992	\$159.00	\$599,933.90		Miscellaneous
20260309C	4705148	4397	Cenex Zip Trip #72	Butte	12/16/2005	\$1,290.00	\$69,127.59		Data Valid Form DVSF
20260309E	5605861	3799	Pelican Oil Inc	Billings	4/21/2003	\$4,465.32	\$169,012.85	\$1,320.08	Report
20260309H	3300047	235	Farmers Union Oil Co Roundup	Roundup	8/23/1991	\$8,026.00	\$119,177.30	\$1,927.00	Report
20260108B	2408739	6494	MDT Swan Lake Site	Swan Lake	1/8/2026	\$11,139.40	\$11,139.40	\$11,299.00	Well Installation
20260112F	5605074	4416	Lockwood Interstate Exxon	Billings	12/18/2006	\$9,640.92	\$51,614.35	\$9,792.92	Well Installation
20260226C	310274	2559	Farmers Union Oil Co Chinook	Chinook	9/13/1995	\$59,008.58	\$315,053.69	\$4,332.06	Laboratory Analysis w/fee
20260112G	5605074	5058	Lockwood Interstate Exxon	Billings	1/12/2026	\$3,733.62	\$4,152.37	\$11,504.81	Well Installation
20260217A	1509705	6241	CHS - Central	Kalispell	2/16/2021	\$3,584.64	\$98,037.48	\$796.11	Well Abandonment
20260310B	5609753	3131	Circle K Store 2476285	Billings	5/16/1997	\$8,705.65	\$148,407.13	\$199.75	Laboratory Analysis w/fee
20260311A	4700018	959	Corporate Air Butte	Butte	4/27/1992	\$795.00	\$124,837.22		Work Plan
20260317A	4002755	2619	Farmers Union Oil Bulk Plant	Terry	8/31/1995	\$2,006.15	\$275,236.59		Monitoring

Claim ID	Facility ID	Release ID	Facility Name	City	Initial Claim	Reimbursement	Cumulative Reimb	Adjustments	Task Description
20260317B	4002755	4948	Farmers Union Oil Bulk Plant	Terry	4/27/2015	\$2,006.15	\$151,846.21		Monitoring
20260317I	2906376	3689	Farmers Union Oil Co Circle	Circle	4/15/2015	\$4,988.52	\$521,171.02	\$7.02	Monitoring
20260317J	2906376	3803	Farmers Union Oil Co Circle	Circle	3/26/2001	\$4,595.52	\$228,875.57	\$7.02	Monitoring

26 claims in the report

Total Reimbursement: \$245,607.88

Reviewed for Reimbursement by: Ann E. Reest

Date 5-6-2026

Approved for Reimbursement by: Jay Wadsworth

Date 5/13/2026



Petroleum Tank Release Compensation Board

Weekly Reimbursement Summary for 5/6/2026

Org Unit: 993050

Account: 67201

Claim ID	Facility ID	Release ID	Facility Name	City	Initial Claim	Reimbursement	Cumulative Reimb	Adjustments	Task Description
20260317L	1401292	3040	Winifred Farmers Oil	Winifred	6/23/1997	\$3,983.00	\$221,060.57	\$21.20	Miscellaneous
20260317M	1508709	2567	Town Pump Inc Kalispell 1	Kalispell	3/8/1996	\$1,636.98	\$211,335.21		Miscellaneous
20260317N	3201458	6643	Paws Up Ranch LLC	Greenough	7/1/2024	\$780.00	\$109,881.99		Work Plan
20260317O	1506101	1850	Kelly Raes	Kalispell	9/30/1994	\$4,335.00	\$335,449.79		Report
20260317P	2404530	873	Cenex Supply & Marketing Ronan	Ronan	7/27/1992	\$600.00	\$368,879.68		Project Management
20260317R	2708699	6674	Town Pump Inc Eureka	Eureka	3/17/2026	\$4,353.50	\$4,353.50	\$4,353.50	Laboratory Analysis w/fee
20260320A	4703757	4368	Vogue Cleaners Corp	Butte	8/8/2005	\$733.50	\$274,618.23	\$96.00	Work Plan
20260323A	701418	3212	Keiths Country Store	Great Falls	10/5/2000	\$3,143.00	\$625,919.23		Report
20260323B	4812059	4036	Montana Rail Link	Columbus	12/7/2022	\$6,777.03	\$34,730.41		Report
20260323C	1102466	3854	Robins Conoco Service	Glendive	8/23/2000	\$17,572.46	\$402,325.66		Miscellaneous
20260323D	1605753	6598	Former Flying J Inc Belgrade	Belgrade	11/8/2024	\$3,480.00	\$138,164.89		Survey
20260310A	708065	2597	Holiday Stationstore 267	Great Falls	10/25/1996	\$8,835.36	\$651,398.64		Laboratory Analysis w/fee
20260326A	1513373	4494	Department of Military Affairs	Kalispell	3/1/2010	\$1,462.05	\$107,645.16	\$55.00	
20260327A	1711117	902	6 Ds Inc	Jordan	2/28/1992	\$4,404.50	\$384,829.96		Report
20260330A	4700018	959	Corporate Air Butte	Butte	4/27/1992	\$1,040.25	\$125,877.47		Monitoring
20260330B	5608670	2446	Town Pump Inc Billings 1	Billings	10/27/1994	\$4,125.00	\$222,078.41		Project Management
20260413A	5608286	2758	Market Basket Store	Billings	1/3/1996	\$1,361.70	\$128,924.52		Project Management
20250313A	5313598	4333	Former Mikes Muffler	Glasgow	2/15/2005	\$2,830.00	\$353,863.19		Report
20250929B	5613982	3965	Engel & Voelkers Billings	Billings	8/23/2000	\$10,617.90	\$54,752.39	\$47.69	Fieldwork
20251126K	5605083	138	Fastlane C Stores Frmer Kwik Way 15	Laurel	3/6/1990	\$12,509.38	\$120,050.95	\$3,286.25	Report
20260310D	5309712	2686	Circle K Store 2746281	Glasgow	5/29/1996	\$22,994.73	\$214,167.56	\$209.25	Well Installation
20260313A	1401292	3040	Winifred Farmers Oil	Winifred	6/23/1997	\$1,325.00	\$221,060.57		Laboratory Analysis w/fee
20260316B	5608211	1564	Broadwater Cenex	Billings	8/12/1993	\$4,460.01	\$255,648.42	\$656.70	Miscellaneous

Wednesday, May 20, 2026

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Payment Reports _ Weekly Reimbursement by Date

Claim ID	Facility ID	Release ID	Facility Name	City	Initial Claim	Reimbursement	Cumulative Reimb	Adjustments	Task Description
20260316C	5102025	3797	Taylor's Bulk Plant	Sunburst	4/1/2002	\$8,837.50	\$473,589.28		Report
20260316E	4701980	1058	Butte School Dist 1 Bus Barn	Butte	3/29/2013	\$1,252.60	\$392,480.03	\$31.25	Miscellaneous
20260317D	5613778	4422	Unocal Bulk Plant	Polson	1/5/2006	\$3,055.00	\$201,145.60		Report
20260317C	2710131	3287	Moore Oil Bulk Facility	Libby	5/12/1999	\$1,532.50	\$833,480.36	\$12.50	Work Plan
20260317F	6015070	4542	Former Amoco	Polson	5/15/2008	\$3,055.00	\$759,695.62		Report
20260317H	3209722	4280	Fort Lolo Hot Springs	Lolo	5/4/2005	\$1,526.98	\$744,697.74		Work Plan
20260317K	6015311	5242	Mountain View Coop	Black Eagle	5/7/2018	\$2,957.50	\$172,389.59	\$10.60	Monitoring
20260309D	4705148	4397	Cenex Zip Trip #72	Butte	12/16/2005	\$2,542.00	\$69,127.59	\$1,563.00	Report

31 claims in the report

Total Reimbursement: \$148,119.43

Reviewed for Reimbursement by: *Sharon Dine*

Date 5-6-2026

Approved for Reimbursement by: *Ann R. Reed*

Date 5-21-2026



Petroleum Tank Release Compensation Board

Weekly Reimbursement Summary for 5/20/2026

Org Unit: 993050

Account: 67201

Claim ID	Facility ID	Release ID	Facility Name	City	Initial Claim	Reimbursement	Cumulative Reimb	Adjustments	Task Description
20260310H	2108068	5212	Circle K Store 2746272	Havre	8/15/2019	\$64,651.54	\$405,209.61	\$7,600.53	Miscellaneous
20260317E	2413301	3249	Pacific Pride Polson	Polson	10/6/1998	\$600.00	\$403,684.53		GW Interim Data Submittal
20260317G	2503919	3997	Noons 439	Helena	7/20/2001	\$4,840.00	\$148,085.72		Report
20260413B	2203645	6678	Town Pump Inc Whitehall	Whitehall	9/8/2025	\$2,829.26	\$21,688.67		Laboratory Analysis w/fee
20260413C	2203645	6639	Town Pump Inc Whitehall	Whitehall	11/28/2025	\$1,475.13	\$14,927.18	\$1,475.13	Laboratory Analysis w/fee
20260413D	4708687	6653	Town Pump Inc Butte 10	Butte	5/29/2025	\$1,191.70	\$11,209.48	\$1,206.70	GW Interim Data Submittal
20260413G	9995052	4603	Golden Spike	Havre	6/12/2008	\$3,724.28	\$209,198.42	\$83.30	Rem Sys Install
20251223A	3201296	3756	Car Wash Building	Missoula	5/23/2001	\$2,737.26	\$144,119.36	\$862.51	Laboratory Analysis w/fee
20260108A	2408739	6494	MDT Swan Lake Site	Swan Lake	1/8/2026	\$13,127.62	\$24,267.02	\$8,220.59	Well Installation
20260120V	3108719	6498	Town Pump Inc Superior	Superior	2/19/2025	\$19,216.57	\$49,647.52	\$2,709.00	Report
20260422D	2404530	873	Cenex Supply & Marketing Ronan	Ronan	7/27/1992	\$2,924.80	\$381,062.48		Monitoring
20260422F	1508723	611	Town Pump Inc Whitefish	Whitefish	12/18/1991	\$644.10	\$400,589.22		GW Interim Data Submittal
20260424A	1408126	5213	PJG Motorsports	Lewistown	5/21/2021	\$10,140.13	\$203,125.35	\$42.50	Fieldwork
20260427B	2404530	873	Cenex Supply & Marketing Ronan	Ronan	7/27/1992	\$5,823.00	\$381,062.48		Laboratory Analysis w/fee
20260302J	9995062	4125	Big Hole Petroleum Bulk Plant	Wisdom	7/23/2008	\$1,000.75	\$477,784.28	\$224.25	GW Interim Data Submittal
20260309G	9995052	4603	Golden Spike	Havre	6/12/2008	\$35,576.44	\$209,198.42	\$150.28	Rem Sys Install
20260310C	713729	6497	Circle K Store 2746059	Great Falls	1/25/2024	\$7,324.52	\$36,802.91	\$1,029.26	Laboratory Analysis w/fee
20260310E	2108068	3537	Circle K Store 2746272	Havre	4/16/1999	\$17,906.61	\$202,109.97	\$156.44	Miscellaneous
20260427I	32343	5338	Gilbert Property	Havre	9/3/2020	\$7,542.10	\$103,865.60	\$152.20	Laboratory Analysis w/fee
20260501A	4701980	1058	Butte School Dist 1 Bus Barn	Butte	3/29/2013	\$1,107.00	\$394,793.63	\$54.00	Miscellaneous
20260422B	4700018	959	Corporate Air Butte	Butte	4/27/1992	\$1,538.30	\$127,415.77	\$39.48	Laboratory Analysis w/fee
20260501B	4701980	1058	Butte School Dist 1 Bus Barn	Butte	3/29/2013	\$1,206.60	\$394,793.63		Miscellaneous

22 claims in the report

Total Reimbursement: \$207,127.71

Thursday, June 11, 2026

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Payment Reports _ Weekly Reimbursement by Date

Claim ID	Facility ID	Release ID	Facility Name	City	Initial Claim	Reimbursement	Cumulative Reimb	Adjustments	Task Description
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Reviewed for Reimbursement by: Ann K. Root Date 6-5-2026

Approved for Reimbursement by: Jay Wadsworth Date 6/11/2026



Petroleum Tank Release Compensation Board

Weekly Reimbursement Summary for 5/27/2026

Org Unit: 993050

Account: 67201

Claim ID	Facility ID	Release ID	Facility Name	City	Initial Claim	Reimbursement	Cumulative Reimb	Adjustments	Task Description
20260409A	5600503	3189	Superpumper 74	Billings	11/23/1998	\$17,179.47	\$102,685.29	\$556.00	Miscellaneous
20260413E	5608211	1564	Broadwater Cenex	Billings	8/12/1993	\$7,565.80	\$263,214.22	\$471.00	Well Installation
20260413F	5605861	3799	Pelican Oil Inc	Billings	4/21/2003	\$1,792.58	\$170,805.43	\$2,194.92	Project Management
20260422C	9995030	4486	Scotts Auto Body	Chinook	6/4/2007	\$2,875.00	\$26,926.73	\$429.00	Report
20260423A	1503915	4392	Zip Trip 39 formerly Noons 437	Kalispell	9/6/2005	\$506.25	\$16,802.95	\$1,150.00	Project Management
20260504A	4702089	4367	Bobbi's Hideaway former Sinclair Retail 250	Butte	2/25/2005	\$4,138.60	\$154,502.23	\$5.40	Fieldwork
20260504B	2312064	2766	GW Sales Bulk Plant #2766	Stanford	10/30/1996	\$1,305.77	\$239,349.99		Work Plan
20260508A	4711251	539	Montana Agri Food Industrial Com	Butte	6/29/1990	\$2,172.60	\$348,955.16	\$74.80	Project Management
20260508B	1500065	473	Roy Stanley Chevrolet	Kalispell	9/29/1992	\$1,904.62	\$982,500.00		Soil Removal
20260508E	5109749	2896	Town Pump Inc Shelby	Shelby	11/16/2022	\$4,584.50	\$392,172.72		Report
20260508F	1408711	5278	Town Pump Inc Lewistown	Lewistown	2/6/2019	\$3,232.00	\$177,821.22		Report
20260518A	5003596	1469	Mountain View Coop Fairfield	Fairfield	9/27/1994	\$3,555.13	\$261,760.75	\$2,207.07	Fieldwork
20260511A	2404615	6505	Coulter Automotive Inc	Charlo	11/22/2023	\$9,099.39	\$26,138.78	\$785.61	Laboratory Analysis w/fee
20260518B	5003596	4385	Mountain View Coop Fairfield	Fairfield	3/8/2013	\$888.78	\$72,268.07	\$551.77	Fieldwork
20260518C	3701649	123	Mountain View Coop Conrad Fmr Farmers S	Conrad	10/10/1990	\$10,653.62	\$413,252.78	\$4,314.84	Monitoring
20260511B	2508659	2988	Sams High Country Travel Plaza	Helena	11/15/1996	\$480.00	\$475,713.96	\$37.50	Project Management
20260511C	2404530	873	Cenex Supply & Marketing Ronan	Ronan	7/27/1992	\$3,435.00	\$381,062.48		Report

17 claims in the report

Total Reimbursement: \$75,369.11

Reviewed for Reimbursement by: Harold Pine

Date 6-1-2026

Approved for Reimbursement by: Jerry Madeworth

Date 6/11/2026

RATIFICATION OF WEEKLY REIMBURSEMENTS
Prevention and Compliance Claims

WEEKLY CLAIM REIMBURSEMENTS June 22, 2026, BOARD MEETING		
Week of	Number of Claims	Funds Reimbursed
5-13-26	7	\$11,260.00
Total	7	\$11,260.00

Petroleum Tank Release Compensation Board

Reimbursement by Payee on 5/13/2026

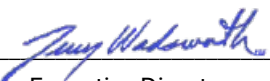
Prevention and Compliance Claims

Org Unit: 993050 Account: 672010

Accrued	Claim ID	Payee	Facility ID	Facility Name	Claim Amount	Amount Paid	Total
	20260323A_P	Papas Market 14535 Hwy 35 Bigfork, MT 59911	24-06085 TID 22990	Papa's Market	\$2,197.00	\$2,000.00	\$2,000.00
	20260423A_P	Pryor Self Service P.O. Box 130 Pryor, MT 59066	02-10164 TID 17823	Pryor Self Service	\$665.00	\$665.00	\$665.00
	20260424A_P	Town Pump Inc 6000 S Main St Butte, MT 59702	56-13825 TID 30511	Columbia Falls 2 Town Pump LLC	\$2,531.32	\$2,000.00	\$2,000.00
	20260501A_P	SNG Inc 4410 State Ave Billings, MT 59101	56-05748 TID 29946	3 G's Convenience Store #5	\$2,140.00	\$2,000.00	\$2,000.00
	20260501B_P	Friendly's Inc 1831 11th Ave Helena, MT 59601	25-01314 TID 23408	Friendly's Sinclair	\$1,920.00	\$1,920.00	\$1,920.00
	20260504A_P	First and Last Change 406 LLC 107 2nd Ave NE Wibaux, MT 59353	55-13599 29677	First and Last Change 406 LLC	\$2,665.00	\$2,000.00	\$2,000.00
	20260505A_P	Meridian Automotive 1240 Ave C Billings, MT 59102	56-05077 TID 30000	Meridian Automotive Service	\$675.00	\$675.00	\$675.00

Total Paid \$11,260.00

Reviewed By:  Date: 5-12-2026

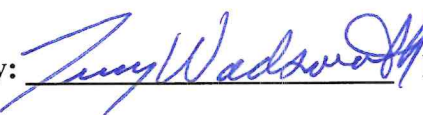
Approved By:  Date: 5/12/2026
Executive Director

CLAIMS OVER \$25,000.00 *
June 22, 2026

Facility Name Location	Facility- Release ID#	Claim#	Claimed Amount	Adjustments	Penalty	Co-pay	**Estimated Reimbursement
Air Controls Billings	32601 6793	20260416A	\$47,933.33	-0-	-0-	\$17,500.00	\$30,433.33
Town Pump Eureka	2708699 6674	20260422E	\$53,453.57	\$422.89	-0-	\$13,146.50	\$39,884.18
Caseys Corner 80206 Gallatin Gateway	1606923 6292	20260126B	\$45,036.80	\$4,351.60	-0-	\$17,500.00	\$23,195.20
Total							

* In accordance with Board delegation of authority to the Executive Director signed on December 8, 2003, the Board staff will review the claims for the Board. If the dollar amount of the claim is \$25,000.00 or greater, the claim must be approved and ratified by the Board at a regularly scheduled meeting before reimbursement can be made.

**In the event that other non-Board claims are paid in the period between preparation for this Board meeting and payment of the claim listed above, the amount of co-payment remaining may differ from that projected at this time, which may change the estimated reimbursement.

Reviewed for Reimbursement by:  Date 6/11/2026

Board Approval by: _____ Date _____

BOARD ATTORNEY REPORT

June 3, 2026

- Other
 - *Cascade Cnty v. Mont. Petroleum Tank Release Comp. Bd., DA 24-0362 (Mont. Supreme Ct.):* The Montana Supreme Court's order in this matter and was remanded back to the Lewis & Clark District Court which received that order in June of 2025, and no further action has been taken by the district court. The district court must first remand the case to the Board before further action can be taken, as indicated below in the Supreme Court opinion. Council for Cascade County, Jackie Papez, suggested a meeting with Board council to discuss the status of the case, but so far no meeting has been set.
 - *The Montana Supreme Court stated that the Board had previously not denied or approved the submitted costs, as the Board had stated that the costs could not be approved or denied until they were apportioned to the releases. The Montana Supreme Court reversed the denial of the writ of mandate and remanded the case to the district court to issue a writ requiring the Board "to review and determine eligibility of the claims submitted by the County for reimbursement of costs resulting from remediating the contamination."*

Petroleum Tank Release Compensation Fund Budget Status Report Operating Statement May 31, 2026						
	Legislative Approp.	Standard Budget	Rev/Exp through 5/31/2026	Projected Rev/Exp	Total FY26 Projected Rev/Exp	Projected Fiscal Year End Balance
Revenues:						
MDT Fee Revenue Estimate	8,050,000	8,050,000	7,342,266	646,000	7,988,266	(61,734)
Estimated STIP interest earnings	300,000	300,000	286,300	27,500	313,800	13,800
Misc Revenue & Settlements	0	0	1,002	0	1,002	1,002
Total Revenues:	8,350,000	8,350,000	7,629,567	673,500	8,303,067	(46,933)
Expenditures:						
(Includes current year expenses only)						
Board						
Personal Services*	612,357	612,357	600,434	55,000	655,434	(43,077)
Contracted Services	25,000	25,000	0	2,000	2,000	23,000
Operating	316,221	316,221	201,268	18,000	219,268	96,953
Subtotal	953,578	953,578	801,702	75,000	876,702	76,876
DEQ Regulatory						
Personal Services*	1,551,615	1,551,615	1,114,629	135,000	1,249,629	301,986
Contracted Services	95,000	95,000	36,241	7,000	43,241	51,759
Operating	823,499	823,499	437,800	43,000	480,800	342,699
Subtotal	2,470,114	2,470,114	1,588,670	185,000	1,773,670	696,444
Administrative Budget Remaining						773,320
Claims/Loan						
Regular Claim Payments	4,500,000	4,500,000	4,107,018	416,137	4,523,155	(23,155)
Accrual - FY26 for use in FY27	750,000	750,000	0	750,000	750,000	0
Subtotal	5,250,000	5,250,000	4,107,018	1,166,137	5,273,155	(23,155)
Total Expenses:	8,673,692	8,673,692	6,497,390	1,426,137	7,923,527	750,165
Increase/(Decrease) of Revenues over Exp as of May 31, 2026			\$1,132,177	(\$752,637)	\$379,540	

Accrual Information	
	Claims
Accrued in FY2025 for use in FY2026	773,987
Total Payments	470,491
Accrual Balance	303,496

Average Monthly Claims	
FY26 to 05/31/26 - Current Year Only	373,365
FY26 to 05/31/26 - Current Year + Accruals	416,137
Actual Claims Paid in FY 2026 (Current Year + Accruals)	4,577,509

At \$.0075 per gallon sold, the revenue collected this year is equivalent to
979.0 million gallons sold.

	Fund Balance	Cash Balance
Beginning Balance	7,653,331	7,290,919
Revenues	8,303,067	8,303,067
Expenditures (affecting balance)	7,023,007	7,764,327
Projected Balance at 6/30/26	8,933,390	7,829,658

Revenue	
Revenue & Transportation Interim Committee	
Revenue Estimate for FY26	7,786,000
Biennial Report Revenue Estimate for FY26	7,960,000
MDT FY26 Revenue Estimate	8,050,000
MDT FY26 Revenues Collected	91% 7,342,266

Settlements	
Settlements received during FY2026	
Settlements received to date	2,511,687

* Personal Services appropriation assumes 4% vacancy savings, no overtime & no professional growth pay increases. Based on current incumbent or vacancy at snapshot.

Cash Flow Analysis - FY26

	Actual					
	July-25	August-25	September-25	October-25	November-25	December-25
Beginning Cash Balance	7,290,918.60	7,598,487.20	8,099,090.34	8,540,590.23	8,357,718.93	8,707,789.73
Revenue						
MDT Revenue (\$.0075/gallon)	661,360.00	739,708.00	839,684.00	773,496.00	721,760.00	704,069.00
STIP Earnings	0.00	27,636.62	29,981.97	30,789.51	33,035.65	29,331.55
Settlements						
Other Misc Revenue	0.00	0.00	0.00	0.00	0.00	0.00
Total Revenue	661,360.00	767,344.62	869,665.97	804,285.51	754,795.65	733,400.55
Expenditures						
Petro Board Claims	7,866.21	60,617.89	189,751.70	670,316.02	117,765.02	713,129.49
Petro Board Staff	33,563.29	63,454.77	92,682.78	72,748.34	90,135.51	69,053.31
Prior Year Adj & Accrual Adj	232,252.76	60,167.12	54,704.81	112,001.76	1,846.00	116,259.10
DEQ Regulatory	80,109.14	82,501.70	91,026.79	132,090.69	194,978.32	153,272.50
Total Expenditures	353,791.40	266,741.48	428,166.08	987,156.81	404,724.85	1,051,714.40
Ending Cash Balance	7,598,487.20	8,099,090.34	8,540,590.23	8,357,718.93	8,707,789.73	8,389,475.88

Cash Flow Analysis - FY26

	January-26	February-26	March-26	April-26	May-26	Projected June-26
Beginning Cash Balance	8,389,475.88	8,251,786.94	8,488,920.50	7,666,454.38	8,000,935.17	7,832,295.48
Revenue						
MDT Revenue (\$.0075/gallon)	612,635.00	579,670.00	560,012.00	521,635.00	628,237.00	646,000.00
STIP Earnings	29,956.15	28,017.77	25,406.15	27,527.56	24,616.60	27,500.00
Settlements						
Other Misc Revenue	0.00	0.00	0.00	1,001.50	0.00	0.00
Total Revenue	642,591.15	607,687.77	585,418.15	550,164.06	652,853.60	673,500.00
Expenditures						
Petro Board Claims	558,238.64	144,800.90	1,078,710.55	17,185.00	548,636.32	416,137.00
Petro Board Staff	64,837.24	69,477.20	105,048.43	61,572.12	79,128.89	75,000.00
Prior Year Adj & Accrual Adj	5,743.25	0.00	7,825.49	0.00	0.00	0.00
DEQ Regulatory	151,460.96	156,276.11	216,299.80	136,926.15	193,728.08	185,000.00
Total Expenditures	780,280.09	370,554.21	1,407,884.27	215,683.27	821,493.29	676,137.00
Ending Cash Balance	8,251,786.94	8,488,920.50	7,666,454.38	8,000,935.17	7,832,295.48	7,829,658.48

**Petroleum Tank Release Compensation Fund
Budget Status Report
Monthly Expenditure/Projection Summary
May 31, 2026**

6/4/2026
REPORT ITEM
INFORMATIONAL

EXPENDITURE SUMMARY		PERIOD ENDING 07/31/25	PERIOD ENDING 08/31/25	PERIOD ENDING 09/30/25	PERIOD ENDING 10/31/25	PERIOD ENDING 11/30/25	PERIOD ENDING 12/31/25	PERIOD ENDING 01/31/26	PERIOD ENDING 02/28/26	PERIOD ENDING 03/31/26	PERIOD ENDING 04/30/26	PERIOD ENDING 05/31/26	PERIOD ENDING 06/30/26	FY26 TOTALS
REVENUE														
	MDT Fees	661,360.00	739,708.00	839,684.00	773,496.00	721,760.00	704,069.00	612,635.00	579,670.00	560,012.00	521,635.00	628,237.00		7,342,266.00
	Stip Earnings		27,636.62	29,981.97	30,789.51	33,035.65	29,331.55	29,956.15	28,017.77	25,406.15	27,527.56	24,616.60		286,299.53
	Misc Revenue										1,001.50			1,001.50
	Total Revenue	661,360.00	767,344.62	869,665.97	804,285.51	754,795.65	733,400.55	642,591.15	607,687.77	585,418.15	550,164.06	652,853.60	0.00	7,629,567.03
BOARD														
	Personal Services	27,067.17	51,053.02	78,793.33	48,260.86	52,412.68	51,458.76	52,188.00	52,451.87	83,769.57	49,567.01	53,411.76		600,434.03
	Contracted Services	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00
	Operating	6,496.12	12,401.75	13,889.45	24,487.48	37,722.83	17,594.55	12,649.24	17,025.33	21,278.86	12,005.11	25,717.13		201,267.85
	Subtotal	33,563.29	63,454.77	92,682.78	72,748.34	90,135.51	69,053.31	64,837.24	69,477.20	105,048.43	61,572.12	79,128.89	0.00	801,701.88
CLAIMS														
	Regular CY Claim Payments	7,866.21	60,617.89	189,751.70	670,316.02	117,765.02	713,129.49	558,238.64	144,800.90	1,078,710.55	17,185.00	548,636.32		4,107,017.74
	Subtotal	7,866.21	60,617.89	189,751.70	670,316.02	117,765.02	713,129.49	558,238.64	144,800.90	1,078,710.55	17,185.00	548,636.32	0.00	4,107,017.74
DEQ Regulatory														
	Personal Services	58,876.32	55,492.64	74,260.63	74,751.10	117,847.85	120,710.22	115,387.70	109,707.68	164,663.07	101,914.10	121,017.58		1,114,628.89
	Contracted Services	4,991.48	8,597.00	0.00	0.00	0.00	477.57	3,115.85	2,912.62	6,339.73	1,937.13	7,869.50		36,240.88
	Operating	16,241.34	18,412.06	16,766.16	57,339.59	77,130.47	32,084.71	32,957.41	43,655.81	45,297.00	33,074.92	64,841.00		437,800.47
	Subtotal	80,109.14	82,501.70	91,026.79	132,090.69	194,978.32	153,272.50	151,460.96	156,276.11	216,299.80	136,926.15	193,728.08	0.00	1,588,670.24
CURRENT YEAR EXPENDITURE TOTALS		121,538.64	206,574.36	373,461.27	875,155.05	402,878.85	935,455.30	774,536.84	370,554.21	1,400,058.78	215,683.27	821,493.29	0.00	6,497,389.86
PRIOR YEAR EXPENDITURES		185.83	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	185.83
TOTAL EXPENDITURES		121,724.47	206,574.36	373,461.27	875,155.05	402,878.85	935,455.30	774,536.84	370,554.21	1,400,058.78	215,683.27	821,493.29	0.00	6,497,575.69
Board & DEQ Non-Claim costs		113,672.43	145,956.47	183,709.57	204,839.03	285,113.83	222,325.81	216,298.20	225,753.31	321,348.23	198,498.27	272,856.97	0.00	2,390,372.12
Claims Accrual Payments		109,028.14	60,167.12	54,704.81	112,001.76	1,846.00	116,344.62	5,743.25	0.00	7,825.49	0.00	2,830.00		470,491.19
PROJECTION SUMMARY														
REVENUE														
	MDT Fees												646,000.00	646,000.00
	Stip Earnings												27,500.00	27,500.00
	TOTAL REVENUE PROJECTED	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	673,500.00	673,500.00
BOARD														
	Personal Services												55,000.00	55,000.00
	Contracted Services												2,000.00	2,000.00
	Operating												18,000.00	18,000.00
	Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	75,000.00	75,000.00
CLAIMS														
	Regular CY Claim Payments												416,137.00	416,137.00
	FYE26 Accrual												750,000.00	750,000.00
	Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,166,137.00	1,166,137.00
DEQ Regulatory														
	Personal Services												135,000.00	135,000.00
	Contracted Services												7,000.00	7,000.00
	Operating												43,000.00	43,000.00
	Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	185,000.00	185,000.00
PROJECTION TOTALS		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,426,137.00	1,426,137.00



MEMO

TO: John Monahan, Terry Wadsworth, and Garnet Pirre, PTRCB
Brad Longcake, MPMCSA
Trent Biggers and Paul Townsend, Town Pump

FROM: Amy Steinmetz, Waste Management and Remediation Division Administrator

DATE: April 27, 2026

SUBJECT: Summary and Results of Continuous Improvement (CI) Project – Cleanup Work Plan Process

Purpose

This memo provides a high-level overview of the Cleanup Work Plan Continuous Improvement (CI) Project in which you've all participated, including DEQ's identified challenges and the solutions being implemented, along with opportunities for PTRCB consideration.

I. DEQ Key Issues and Solutions

The CI project reviewed the full cleanup work plan review and approval process. DEQ identified several systemic challenges and developed corresponding solutions to improve clarity, consistency, and efficiency.

1. Conceptual Site Model (CSM)/Remedial Alternatives Analysis (RAA) Completeness, Consistency, and Readiness

Issues Identified:

- Cleanup work plans are frequently submitted for sites with incomplete or outdated CSMs and RAAs.
- Consultants sometimes push to move forward before technical readiness is achieved.
- DEQ's CSM template is not robust and is sometimes not required to be completed fully.
- Project manager approaches vary, leading to inconsistent use of guidance.
- Differences in training, experience, and attention to detail cause additional variability.

Solution:

Require full site characterization—complete and up to date CSMs and RAAs—*before* a cleanup work plan path forward is decided on and submitted to DEQ for review.

Data gaps in the CSM must be filled and CSMs must be updated throughout the life of the release.

This aligns expectations for consultants, clarifies readiness standards, and reduces avoidable rework. This expectation was shared at PTC's Consultant's Day on April 16, 2026, and training will be developed (or referenced¹) and provided for PTC staff and consultants.

2. Sanitarian Review Process and Comment Coordination

Issues Identified:

- No unified template or tracking system exists for comment management or resolution.
- Consultants and owners lack clarity on DEQ vs. PTRCB roles.
- Feedback often arrives late in the process.
- Too many handoffs and serial review practices slow the workflow.

Solution:

Redesign the review and comment resolution process to clarify expectations across the board. Consultants will receive clear instructions on how DEQ and PTRCB comments must be addressed for DEQ to approve and PTRCB to obligate funding for the work plan. Owners will be cc'd on communications to increase transparency and ensure shared understanding. Whenever possible, DEQ and PTRCB comments will be addressed concurrently to reduce delays. We've drafted language for an email to accompany DEQ and PTRCB comments and will be sharing it for PTRCB review by May 8. We would like to implement this solution by the end of May.

II. Items for PTRCB Consideration

The following are opportunities for PTRCB to adopt, modify, or decline—based on PTRCB preference and capacity. These items reflect consistent feedback from DEQ staff, owners, and consultants.

1. Earlier Cost Eligibility Input and Participation

Many stakeholders, including DEQ staff, have expressed interest in earlier PTRCB involvement in project planning and work plan development. Early alignment among all stakeholders is critical to successful projects and efficient processes². Potential options include:

- Participation in scoping meetings (possibly centered on the RAA).
- Earlier engagement immediately following completion of the CSM/RAA.
- Pre-consultation opportunities with consultants.

¹ ASTM Guide E2531 is the Standard Guide for Development of Conceptual Site Models and Remediation Strategies for Light Nonaqueous-Phase Liquids Released to the Subsurface and should be read to gain a full understanding of the requirements and information necessary to construct a CSM: [ASTM Standard Guide for Developing Conceptual Site Models](#) Also refer to ITRC's LNAPL Site Management: LCSM Evolution, Decision Process, & Remedial Technologies (LNAPL-3), 2018 Section 4.

² ASTM E3488-25

- Clear advance communication outlining which activities are and are not reimbursable and criteria to determine reimbursable activities.

Earlier engagement could: prevent multiple workplan preparations; prevent consultant, owner and staff review time; reduce time to implementation; prevent avoidable costs; reduce confusion; and streamline review—especially once CSM/RAA requirements are fully standardized.

2. Review of Board Briefing Requirements

Current Board briefing requirements add approximately 30 days to the process.

PTRCB may wish to:

- Discuss with customers whether the benefit of briefings outweighs the added delay.
- Explore alternative formats or frequencies.
- Identify briefing elements that are essential versus informational.

III. Conclusion

DEQ is implementing targeted solutions to improve clarity, consistency, and efficiency in the cleanup work plan review and approval process. PTRCB has opportunities to complement these efforts through earlier involvement and potential adjustments to Board briefing practices. Continued coordination between DEQ and PTRCB will help ensure that petroleum release sites progress toward closure in a timely and transparent manner. DEQ is happy to participate in follow-up discussions and to provide more detailed information about this continuous improvement project to anyone who is interested.



Petroleum Tank Release Compensation Board

STATE OF MONTANA

Fund Activity Report Through May 2026

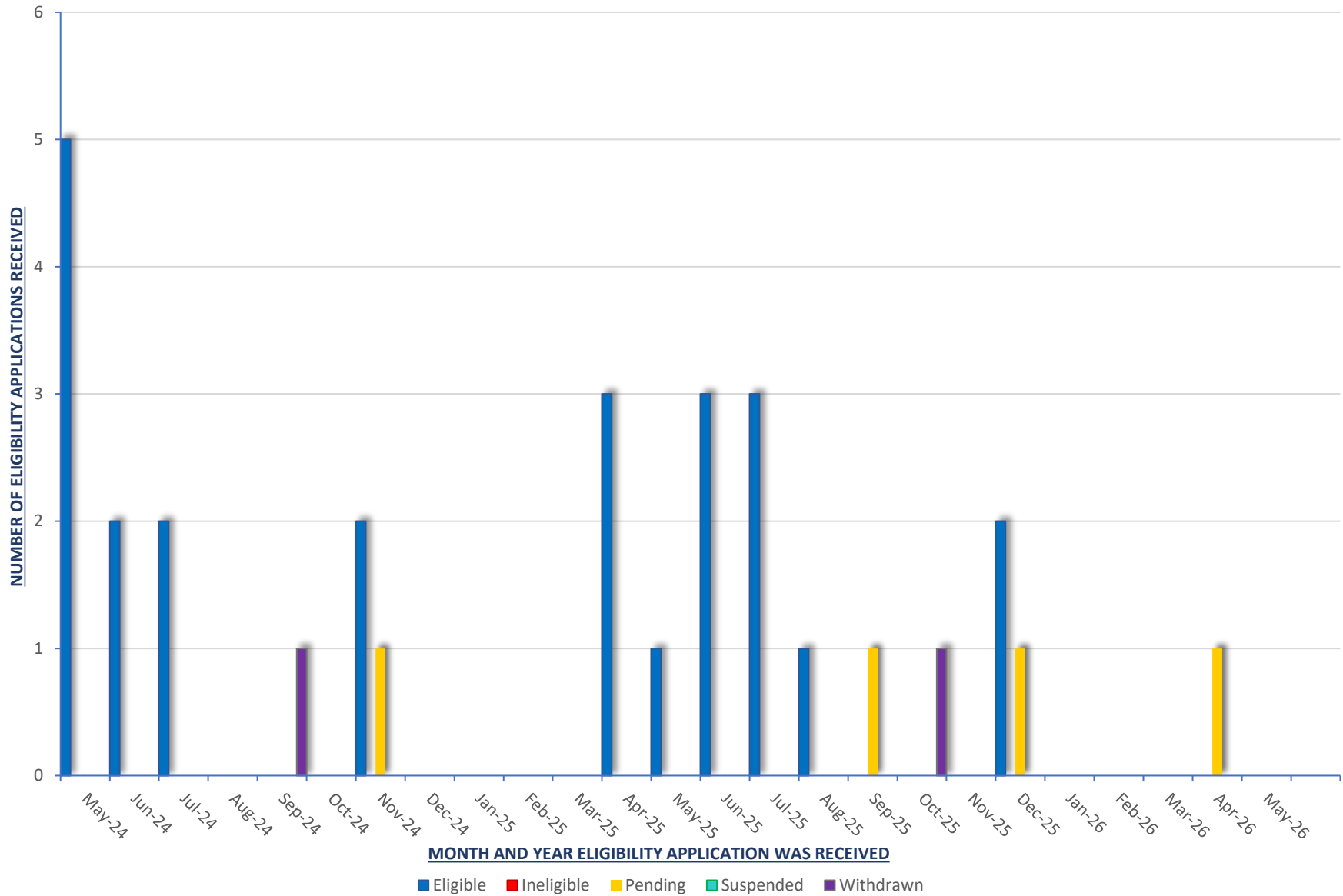
Reporting Category	Status
Amount of Fund balance in Petroleum Tank Release Cleanup Fund	\$7,832,295.48
Portion of the Fund balance that is allocated or encumbered Encumbrance is based on DEQ requesting and approving Work Plans and Board staff setting aside money for those WPs through an “obligation” process.	\$6,809,169.28
Portion of Fund Balance encumbered yearly for Prevention/Compliance	\$ 800,000.00
Total Fund Encumbrance	\$7,609,169.28
Timeliness of Board Payments for completed corrective action plans Reimbursement for corrective action plans is through the claim process.	
Average processing days for non-suspended claims since 1989	31 days
Average processing days for non-suspended claims in past 12 months	40 days

PTRCB Work Plan Activity Report Through May 2026

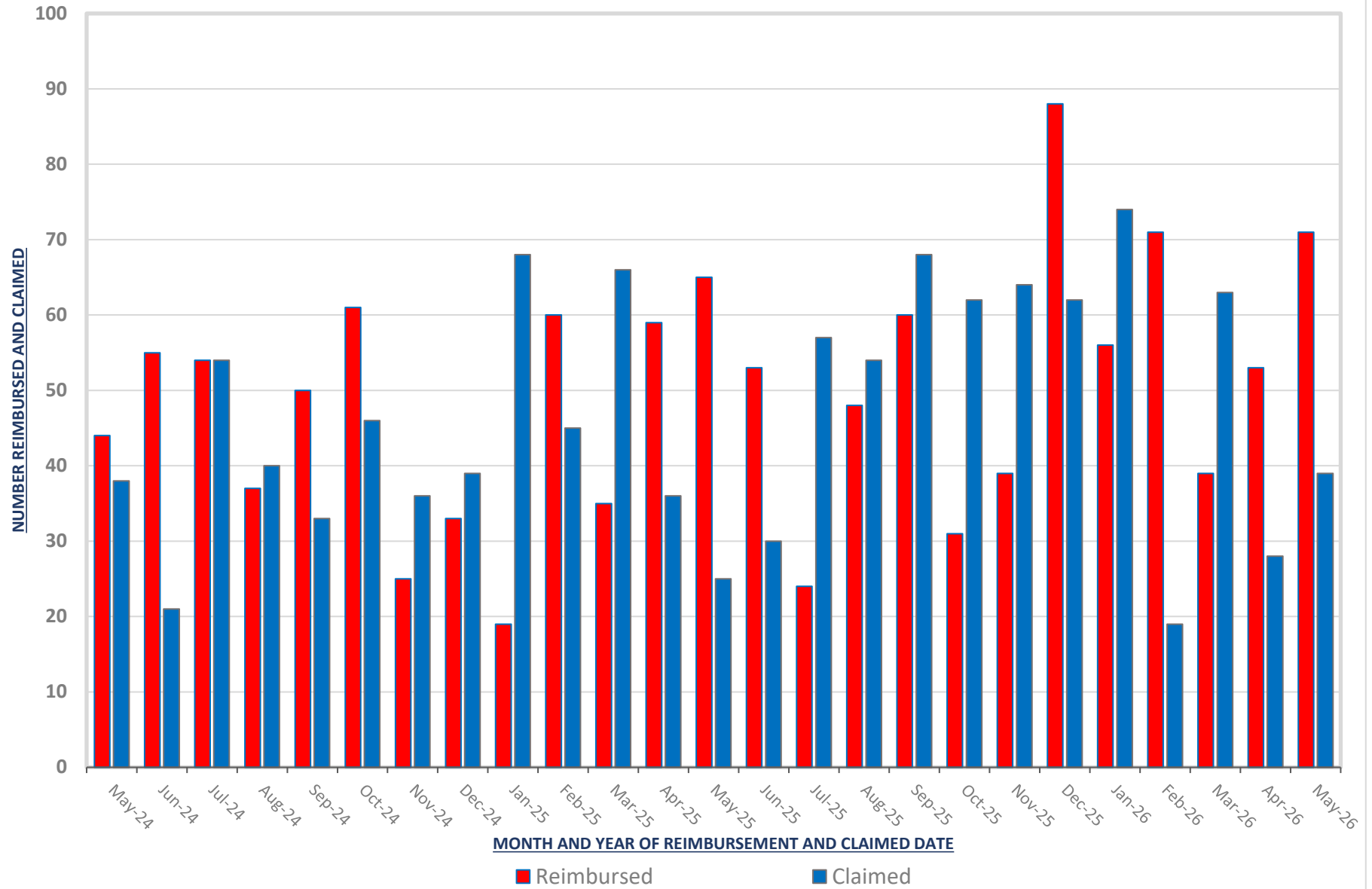
Reporting Category	Quantity
Open Eligible Releases That Have Reached Max Reimbursement	10
Open Eligible Releases in MNA without current work plan	60
Open Eligible Releases in MNA with a current work plan	47
Open Eligible Releases with no current work plan	277
Open Eligible Releases with a current work plan	192
Total Open Eligible Releases	586

Work Plans Available For Obligation Since Last Board Meeting	Dollar Value
8 Work Plans In April 2026	\$450,655.14
3 Work Plans in May 2026	\$67,035.00
Total obligated Funds in April and May	\$517,690.14
3 Work Plans Briefed in today's meeting will be picked up in July's total	

Board Staff Eligibility Graph

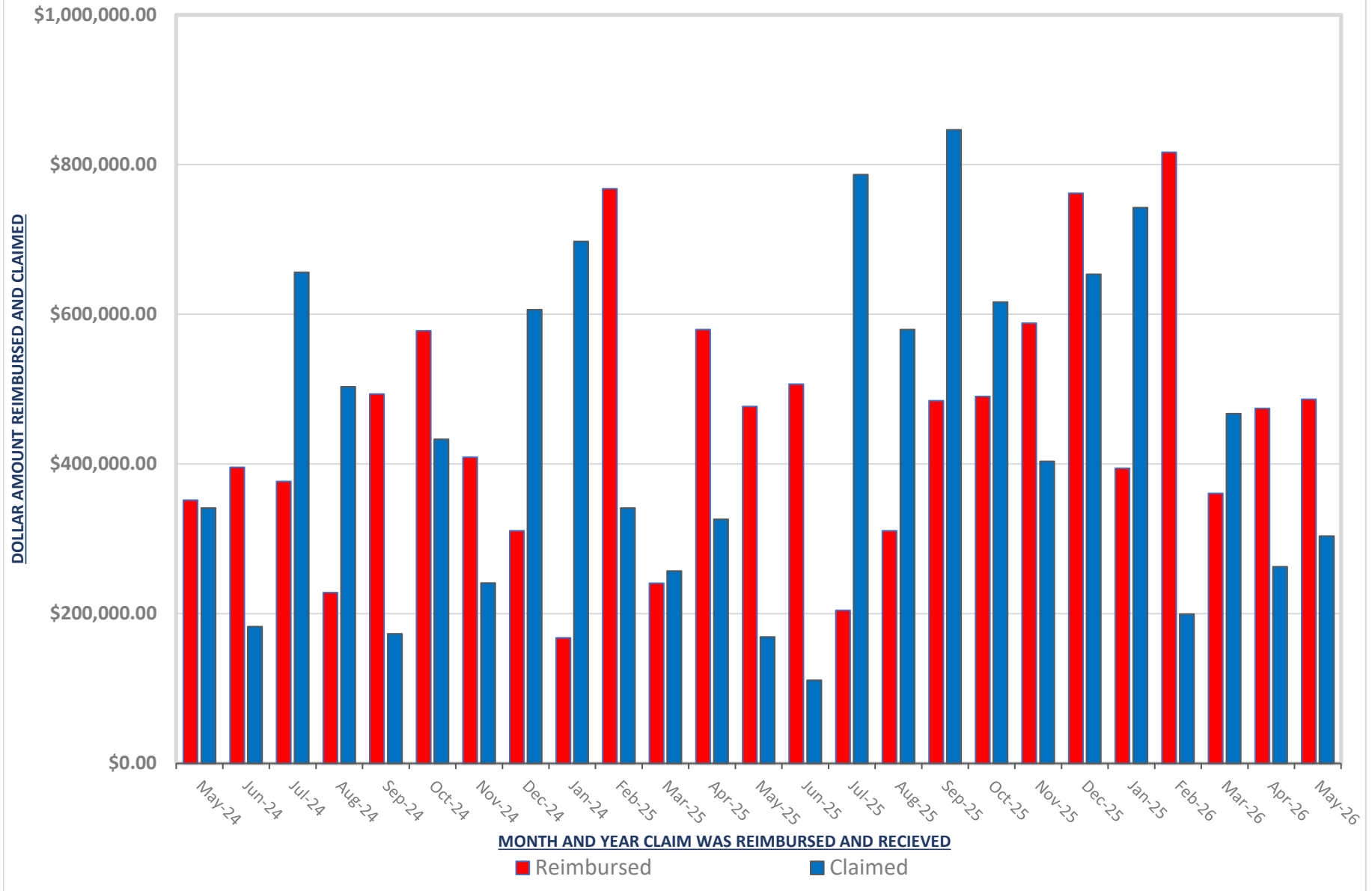


Board Staff Claim Count Graph



[Back To Agenda](#)

Board Staff Claim Value Graph



Petroleum Tank Cleanup Activity Report June 9, 2026

Summary of Confirmed and Resolved Petroleum Releases

New Petroleum Release Activity April 7, 2026 – June 9, 2026

Release Status	Activity
Suspect Releases	3
Confirmed Releases	0
Resolved Releases	2

Summary of All Petroleum Release Activity through June 9, 2026

Release Status	Activity
Total Confirmed	4925
Total Resolved	4017
Total Open	908

Summary (Current) of Petroleum Releases Managed by PTCS

Release Status	Activity
Total Open	839
Total PTRCB Eligible	579
Ineligible	81
*Other	179

*Other – Pending, Withdrawn, Suspended, Not Applied

2026 Stats
 56 Legacy Release Reminder Letters
 70 Work Plan Request Letters sent (67 on Eligible Releases)
 47 Work Plan Approval Letters sent (36 on Eligible Releases)
 176 Work Plans on Eligible Releases



Facility Name: Air Controls Billings

Physical Address: 2109 1st Ave North, Billings

Facility ID: 00-32601

TREADS ID: 32601

Release Number: 6739

Priority: 3.0 Medium Priority Cleanup

Cleanup Work Plan 35168

Air Controls, Inc. (Air Controls) – the responsible party for Release 6739 – retained Resource Technologies, Inc. (RTI) as their environmental consultant. RTI prepared and submitted cleanup work plan 35168 (WP) on behalf of Air Controls. This DEQ-approved WP is expected to clean up petroleum-contaminated media to the extent practicable via soil excavation and disposal. The estimated cost for WP 35168 is \$137,142.10.

Release Closure Plan for Release 6739

RTI submitted a Release Closure Plan (RCP) on behalf of Air Controls as part of an Interim Data Submittal for Remedial Investigation on April 30, 2026. The RCP documented consideration of four (4) cleanup alternatives: soil excavation, amendment injection, soil-vapor extraction (SVE), and monitored natural attenuation (MNA). Based on site-specific subsurface conditions, soil excavation was determined to be the most effective cleanup method at the Facility; whereas amendment injection, SVE, and MNA were all determined to be ineffective. RTI recommended cleanup via soil excavation in critical areas where petroleum contamination leached through the entire soil column to the water table.

WP tasks include the following: project management and oversight; excavation and disposal of petroleum-contaminated soil; backfill excavation; sample collection, laboratory analyses, and data validation; and reporting. Site-surface restoration is not a WP task as the cleanup excavation is within the construction area of Air Controls' ongoing property redevelopment.

Air Controls delayed their ongoing property redevelopment for the past twelve (12) months to allow for cleanup of Release 6739. The cleanup excavation is planned for July or August 2026; and when complete, Air Controls will continue their long-planned property redevelopment projects that include the Release area. Redevelopment projects include storm-drain system installation; backfill of the site-wide excavation; and paving the site. The property will be used for active equipment staging which will limit future access to the petroleum-contaminated areas.

Site History

The Air Controls property (Facility) located at 2109 1st Avenue North in Billings (Site Map) has a history of commercial and industrial use beginning in 1912 when it was an extension of a lumber yard established on an adjacent property to the west. Circa 1948, the property was developed as a fuel station that operated until at least 1975, with six (6) aboveground storage tanks (ASTs) and three (3) underground storage tanks (USTs). Components of that fuel storage system were located on the south and east parts of the Facility; a station building was located near the center (Site Map).

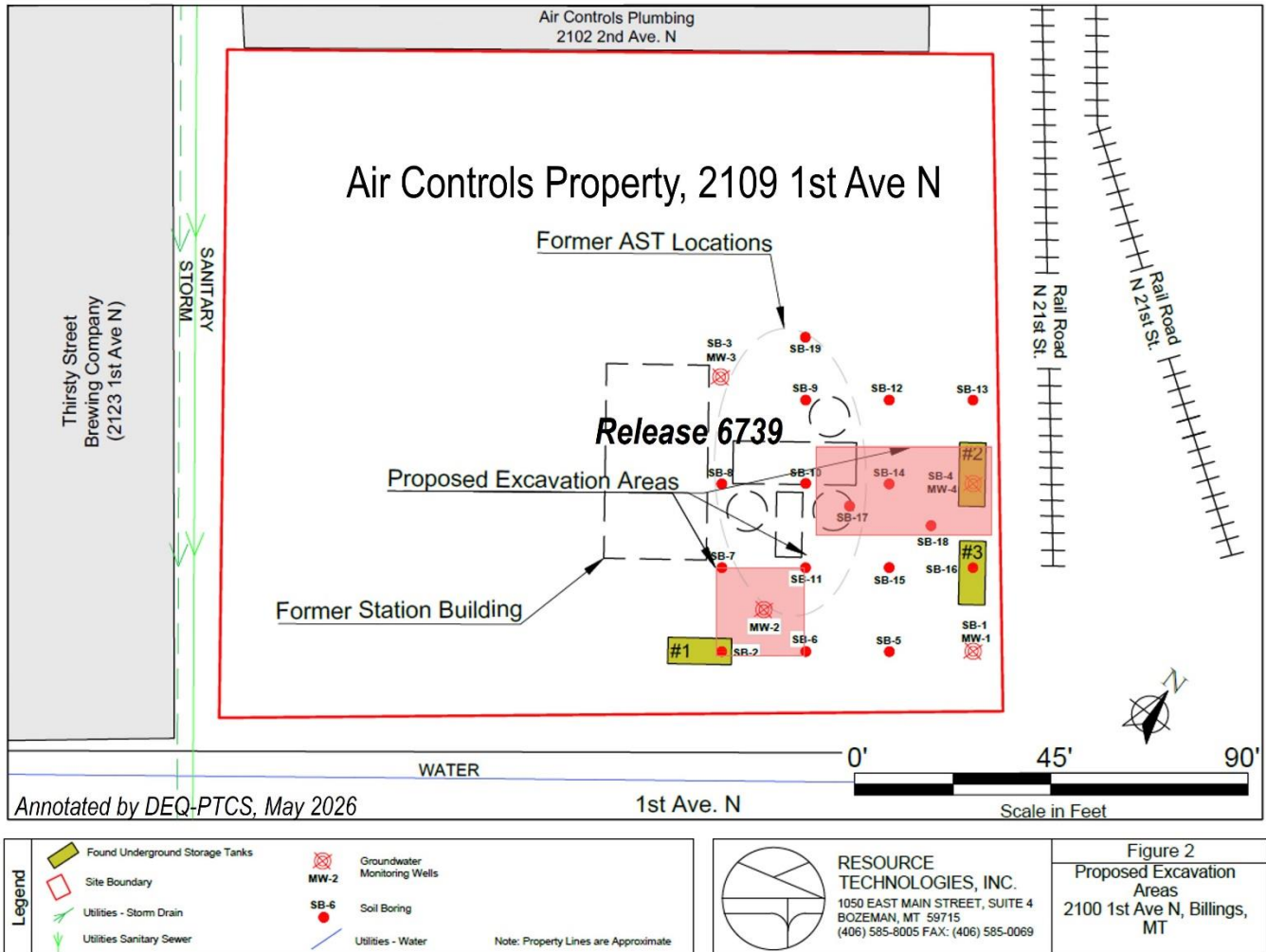
Petroleum Release 6739 was discovered July 9, 2025, during ongoing redevelopment construction work at the Facility. The former station building was demolished, and the surface area of the Facility was being excavated to a depth of approximately two (2) feet below the former ground surface (bgs). That excavation activity uncovered a previously unknown UST on the southern part of the property. Petroleum-stained soil was observed at the edge of that found UST.

Release 6739 was confirmed July 14, 2025, by a laboratory analytical report for a soil sample from a test pit at the found tank; these data documented concentrations of petroleum-fuel compounds that exceeded DEQ's Petroleum-Release Confirmation Risked-Based Screening Levels (RBSLs) for soil.

Continued surficial excavation as part of the redevelopment of the Facility's area uncovered two (2) additional previously unknown USTs along the eastern property boundary. All three found USTs were removed July 21, 2025; confirmation soil samples were collected as required beneath each end of each UST (six samples total); and the laboratory analyses demonstrated that concentrations of petroleum-fuel compounds in all six samples exceeded RBSLs for soil leaching to groundwater.

RTI installed a grid of soil borings and monitoring wells in the southeast part of the property during February 2026. The cumulative laboratory analytical data are the basis for cleanup via soil excavation in areas where petroleum contamination leached through the entire soil column to the water table.

Site Map – Facility features and excavation area for Release 6739





Petroleum Tank Release Compensation Board

Work Plan Task Costs

Facility ID: 32601

FacilityName: Air Controls Billings

City: Billings

Release ID: 6739

WP ID: 716835168

WP Name: C-B-SR/WA

WP Complete:

WP Date: 04/08/2026

Task #	Task Name	Phase	Estimated Cost	Actual Cost	Balance	Comment
1	Work Plan		\$1,050.00			
2	Project Management		\$3,500.00			
3	Mobilization		\$996.60			
4	Lodging/Per Diem		\$626.40			
5	Fieldwork		\$4,513.50			
6	Survey		\$66.00			
7	Well Abandonment		\$856.00			
8	Soil Removal		\$33,458.90			
9	Soil Disposal		\$39,000.00			
10	Laboratory Analysis w/fee		\$4,275.00			
11	Data Valid Form DVSF		\$147.00			
12	Report		\$3,500.00			
Total:			\$91,989.40			



Facility Name: Name: Town Pump Inc Eureka

Physical Address: 10 Dewey Avenue, Eureka

Facility ID: 27-08699

TREADS ID: 24240

Release Number: 6674

Priority: 1.4 High Priority Investigation

Investigation Work Plan 35145

Town Pump, Inc. (Town Pump) – the responsible party for petroleum release 6674 (Release) – has retained West Central Environmental Consultants, Inc. (WCEC) as their environmental consultant. WCEC prepared and submitted work plan 35145 (WP) dated May 26, 2026, on behalf of Town Pump. This DEQ-approved investigation WP is for the following: project management and coordination; mobilization; utility locates; installation of soil borings, groundwater monitoring wells, soil vapor probes, air sparge (AS) wells, and soil vapor extraction (SVE) wells; SVE/AS pilot study; soil, groundwater, and soil vapor monitoring and sampling; monitoring well development; survey monitoring well network; laboratory analyses and data validations; and reporting. The estimated cost for WP 35145 is \$143,075.55.

Release Closure Plan

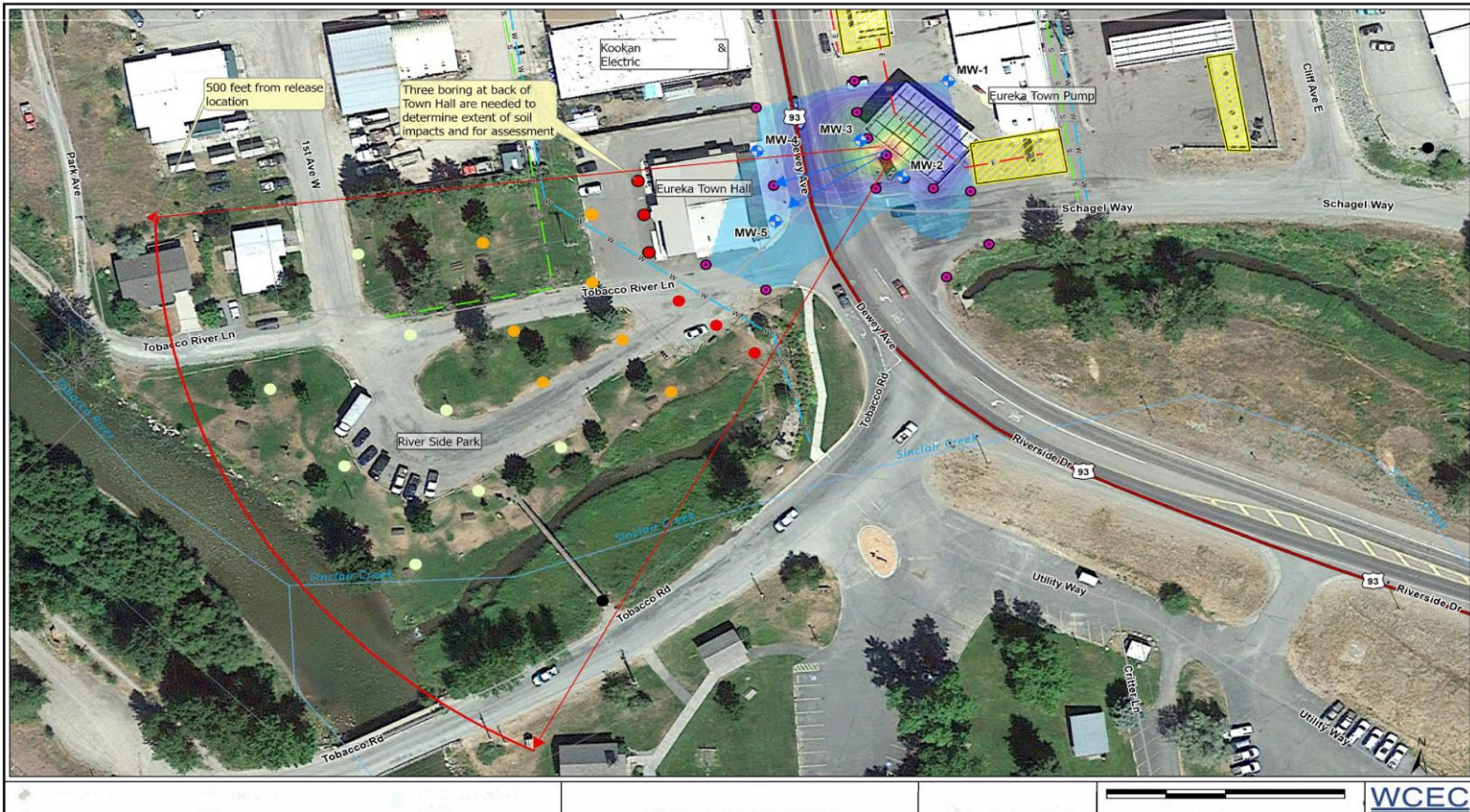
WCEC submitted a Release Closure Plan (RCP) on behalf of Town Pump as an appendix to the Soil Boring, Monitoring Well Installation and Groundwater Monitoring Report dated January 22, 2026. Based on the results from the initial remedial investigation, WCEC recommended conducting an additional remedial investigation in order to fully delineate the downgradient extent and magnitude of petroleum contamination to soil, groundwater, soil vapor, and surface water. In addition, an SVE/AS pilot study was recommended.

Site History

The Facility – located at 10 Dewey Avenue, Eureka, Lincoln County Montana. A suspect release was reported to DEQ on August 5, 2024, when the premium gasoline product line leak detection equipment shut down the product line. Town Pump completed multiple subsequent line testing tests which showed a pressure drop in the piping indicative of a leak. Laboratory analytical results, dated September 17, 2024, confirmed the Release.

In 2025, WCEC advanced seventeen soil borings and installed five groundwater monitoring wells in order to define petroleum contamination near the release location and across the right of way to the south and west.

Site Map – Facility features and Proposed Investigation Areas





Petroleum Tank Release Compensation Board

Work Plan Task Costs

Facility ID: 2708699

FacilityName: Town Pump Inc Eureka

City: Eureka

Release ID: 6674

WP ID: 716835145

WP Name: R-B-SVE-AS-RCPU

WP Complete:

WP Date:

04/01/2026

Task #	Task Name	Phase	Estimated Cost	Actual Cost	Balance	Comment
1	Work Plan		\$2,012.50			
2	Project Management		\$9,450.00			
3	Mobilization		\$6,151.27			
4	Mobilization (GeoProbe)		\$2,766.70			
5	Survey		\$2,243.90			
6	Miscellaneous (Utility Locate)		\$642.00			
7	Fieldwork (Oversight)		\$6,450.00			
8	Miscellaneous (Traffic Control)		\$750.00			
9	Soil Borings		\$5,769.60			
10	Well Installation		\$10,890.00			
11	Miscellaneous (Vapor Extraction Well Installation - 1w/6')		\$900.00			
12	Miscellaneous (Air Sparge Well Installation - 1w/18')		\$1,021.50			
13	Well Development		\$1,403.48			
14	Miscellaneous (Vapor Points - 6 Total)		\$3,849.89			
15	Miscellaneous (Soil Vapor Sampling)		\$2,950.00			
16	Miscellaneous (SVE/AS Pilot Study)		\$11,345.00			
17	Water Level Measurements (1w/2e)		\$96.00			
18	Monitoring (2e/11w, e)		\$4,952.58			
19	Equipment		\$3,353.70			
20	Miscellaneous (Cuttings Disposal)		\$2,660.00			
21	Laboratory Analysis w/fee		\$38,289.00			
22	Lodging/Per Diem		\$4,240.20			
23	Report		\$4,500.00			
24	Report		\$2,520.00			
25	Rel Closure Plan (Update)		\$700.00			

Thursday, June 11, 2026

General Reports _ Work Plan Task Cost

Total: \$129,907.32

Page 1 of 2



Facility Name: Kelly Rae's Inc.
Physical Address: 25 Batavia Lane, Kalispell
Facility ID: 15-06101
TREADS ID: 20691
Release Number: 1850
Priority: 3.0

Cleanup Work Plan 35153

Kalispell Properties LLC is the current responsible party for Release 1850 and has chosen West Central Environmental Consultants (WCEC) as their environmental consultant. WCEC prepared and submitted cleanup work plan 35153 (WP) on behalf of Kalispell Properties LLC. The DEQ approved cleanup work plan is for excavation and disposal of petroleum contaminated soil, collection of soil samples, placement and compaction of backfill, nutrient amendment, site restoration, laboratory analysis of soil samples, and reporting. The work plan is intended to address petroleum contamination in the source area that contributes to persistent petroleum contamination in groundwater under and around a dispenser island that is being moved as part of site improvements. The estimated cost for the cleanup work plan is \$122,496.80.

Release Closure Plan

WCEC submitted a Release Closure Plan (RCP) as an appendix to the PetroFix Injection & Groundwater Monitoring Report dated January 20, 2026. Based on evaluation of site conditions, including but not limited to: the apparent attenuation rates, feasibility of implementation, and estimated costs, and accessibility due to planned facility upgrades, WCEC recommended excavation of petroleum contaminated soil. WCEC revised and resubmitted WP 35153 on May 14, 2026, following a meeting with DEQ, PTRCB staff, and the owner/operator.

Site History

The site is located at 25 Batavia Lane, Kalispell, Flathead County, Montana. The Release was reported to DEQ on January 12, 1994, when petroleum was encountered on groundwater during the removal and replacement of the underground storage tanks. The release has been investigated by the installation and monitoring of 13 groundwater monitoring wells.

In 2018, the facility was upgraded by relocating above-ground storage tanks and adding dispensers. A remedial excavation was coordinated with facility upgrades that allowed for the excavation and disposal of 534 cubic yards of petroleum contaminated soil.

In 2023 seven soil borings were installed around the east dispenser island to determine the extent of additional remedial action needed. Based on these findings and cumulative groundwater data for the facility, a limited pilot test of PetroFix injection was completed near the east dispenser island in 2024. PetroFix was injected into the sandy gravel aquifer with observed petroleum contamination located at depths of 11 to 14 feet below ground surface.

In 2025, the store was destroyed by fire leading to plans to upgrade and reconfigure infrastructure at the facility. Because the east dispenser island is planned to be moved, petroleum contaminated soil observed in the vadose zone (2.5 to 10 feet below ground surface) will be accessible for excavation. Source mass removal will remove petroleum that is leaching to groundwater and enhance attenuation rates of petroleum contamination in groundwater.

Proposed Excavation Area Map





Petroleum Tank Release Compensation Board

Work Plan Task Costs

Facility ID: 1506101 **FacilityName:** Kelly Raes **City:** Kalispell

Release ID: 1850 **WP ID:** 716835153 **WP Name:** C-S-SR/WI/WA/RCP **WP Complete:** **WP Date:** 05/14/2026

Task #	Task Name	Phase	Estimated Cost	Actual Cost	Balance	Comment
1	Work Plan		\$1,050.00			
2	Project Management		\$3,850.00			
3	Mobilization		\$3,086.40			
4	Well Abandonment (4/w)		\$1,520.00			
5	Miscellaneous (Well Extension (5/w))		\$2,008.15			
6	Fieldwork (Excavation Oversight)		\$8,100.00			
7	Miscellaneous (Utility Locate)Subcontractor))		\$802.50			
8	Soil Removal (E, L, H, B (Subcontractor))		\$44,636.25			
9	Miscellaneous (Compaction Testing (Subcontractor))		\$1,605.00			
10	Soil Removal (Disposal (Flathead Landfill))		\$25,378.20			
11	Miscellaneous (Water Disposal (Subcontractor))		\$5,700.00			
12	Miscellaneous (Traffic Control)		\$525.00			
13	Miscellaneous (Dewatering)		\$900.00			
14	Equipment		\$840.90			
15	Miscellaneous (Product)		\$400.00			
16	Laboratory Analysis w/fee		\$7,472.00			
17	Lodging/Per Diem		\$1,814.00			
18	Data Valid Form DVSF		\$150.00			
19	Report		\$3,500.00			
20	Rel Closure Plan (Update)		\$700.00			
Total:			\$114,038.40			