PIONEER TECHNICAL SERVICES

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February 27, 2026

Mr. Jonathan Love
Environmental Science Specialist
Petroleum Tank Cleanup Section
Montana Department of Environmental Quality
P.O. Box 200901
Helena MT 59620-0901

RE: Rev 1: Groundwater Monitoring Work Plan for Former Bair's Truck Stop (Former Broadway Truck Stop), 315 13th Street West, Hardin, Big Horn County, Montana
Facility ID #02-05752, TID #17781, Release #2603, Work Plan ID #35108

Owner/ Responsible Party:	Broadway Truck Stops 6409 E. Sharp Ave. Spokane, WA 99212 damon@broadwaygroup.com	**Consultant/ Work Plan Preparer:**	Pioneer Technical Services, Inc. Charles Peterson, PG 2310 Broadwater Ave, Suite 1 Billings, MT 59102 cpeterson@pioneer-technical.com

Dear Mr. Love:

On behalf of Broadway Truck Stops, Pioneer Technical Services, Inc. prepared the following Groundwater Monitoring Work Plan and cost estimate for performing groundwater monitoring at the former Bair's Truck Stop (former Broadway Truck Stop) in Hardin, Montana. As requested in correspondence dated December 5, 2025, from Montana Department of Environmental Quality, our scope of work and associated proposed costs are outlined below.

If you have any questions concerning this project or the proposed scope of work, please contact me at (406) 702-2430 or cpeterson@pioneer-technical.com.

Sincerely,

Charles Peterson, PG
Program Manager
Pioneer Technical Services, Inc.

Attachment 1: Figures
Attachment 2: Cost Estimates

cc: Mr. Damon Borden, Broadway Truck Stops
Taylor Bienvenue, G.I.T., Pioneer Technical Services, Inc.

EXECUTIVE SUMMARY

The purpose of this document is to provide a Groundwater Monitoring Work Plan (work plan) for the former Bair's Truck Stop (former Broadway Truck Stop) (site) (Facility ID #02-05752) located at 315 13th Street West, Hardin, Big Horn County, Montana, as requested in electronic correspondence from Montana Department of Environmental Quality (DEQ) dated December 5, 2025. The purpose of the proposed work activities is to monitor the response of groundwater impacted by Release #2603 to cleanup efforts completed in 2024 under Work Plan #34805 (Pioneer, 2024). Under Work Plan #34805, approximately 2,006 tons (approximately 1,337 cubic yards) of petroleum-impacted material were removed from the site and disposed of at the Big Horn County landfill, and approximately 2,800 pounds of remediation fluid, PetroFix™ (PetroFix), were applied to the pooled groundwater, excavation base, and sidewalls of the former underground storage tank (UST) basin excavation area to remediate Release #2603.

Montana DEQ requested Work Plan #35108 be developed to perform groundwater monitoring at the site. The groundwater monitoring results will be used to evaluate the cleanup and to propose additional work needed to resolve Release #2603. This work plan provides the details for one year of semi-annual groundwater monitoring at the site. Following completion of both groundwater monitoring events, this work plan includes the development and submittal of a Groundwater Monitoring Report appended with an updated Release Closure Plan (RCP).

1 FACILITY SUMMARY AND CURRENT CONDITIONS

1.1 Physical Location

The former Bair's Truck Stop Hardin (former Broadway Truck Stop) facility is located at 315 13th Street West, Hardin, Big Horn County, Montana. The property (or site) is fairly level with an elevation of approximately 2,902 feet above mean sea level. The subject property is located in a commercial area within the boundaries of the city of Hardin. The property is bounded to the north by 14th Street West, across from which are several eateries and a hotel, to the east by a retail store, to the south by 13th Street West, across from which is an eatery and vacant lot, and to the west by North Crawford Avenue, across from which is a casino, motel, and vacant retail fuel and convenience store building. This area of the city is served by public utility services (municipal potable water, sanitary and storm sewer, natural gas, and electric). The location of the site is shown on the Location and Vicinity Map (Figure 1) and Site Map (Figure 2) in Attachment 1.

In June 2024, all USTs and associated supply piping, dispensers, and canopies were removed from the site. On July 29, 2024, the former convenience store building was still on site, but the building was vacant, and business operations had ceased. The building has since been removed from the site. The western half of the site is covered with gravel, asphalt, and the former building slab. The eastern half of the site is covered with gravel. Currently, no buildings are present on the property.

The site is underlain by clay-rich, alluvial soil, and groundwater exists from 6 to 10 feet below ground surface (bgs). Sandy gravel exists at depths greater than 17 feet at the site. The groundwater flow direction is toward the east-northeast.

1.2 Facility History and Release Background

This section summarizes the history of site operations and environmental history at the former Bair's Truck Stop Hardin (former Broadway Truck Stop) facility.

1.3 Ownership and Operations

At the time of this report, the property is owned by Hardin 2 RE2, LLC (Town Pump). The previous property owner, Broadway Group, sold the facility to Town Pump at the end of 2023. The Broadway Group has retained responsibility for Release #2603.

The site operated as a retail fuel sales facility from at least the 1970s to 2023. In 1995, the site contained four USTs, four gasoline dispenser islands, and four diesel dispenser islands

(Mountain States Petroleum, 1995a). In 1998, one 8,000-gallon gasoline tank was removed from the site (Osborne, 1999).

During the final year of operation, the site contained the following fuel system components:

- One 20,000-gallon steel diesel UST
- One 20,000-gallon steel unleaded gasoline UST
- One 12,000-gallon steel premium gasoline UST
- Four gasoline dispensers and associated piping
- Four diesel dispensers and associated piping

All the former fuel system components (i.e., USTs, dispensers, and associated piping) were removed from the site in June 2024. No business operations are currently being conducted at the site.

1.4 Summary of Work Conducted

The site has had four separate releases (Releases #1040, #1982, #2603, and #4936). Release #1040 was resolved on September 14, 1995, Release #1982 was resolved on July 6, 1995, and Release #4936 was resolved on February 23, 2015. Release #2603 is an active release and is the focus of Work Plan #35108. Release #2603 was initially reported via a DEQ 24-Hour Release Report on May 24, 1995 (Mountain States Petroleum, 1995b). According to the 30-Day Release Report dated June 8, 1995, Release #2603 occurred from a hole in an 8,000-gallon gasoline tank labeled as Tank #2. The release was estimated to be approximately 1,700 gallons and occurred between November 1994 and May 1995 (Mountain States Petroleum, 1995a). According to available historical data, monitoring wells MW-1, MW-2, MW-3, MW-4, and MW-5 were first sampled in November 1996, and groundwater monitoring wells FJ-06-12, FJ-07-12, and FJ-08-12 were first sampled in 2012 (Portage, 2015).

The commercial fuel system, including tanks, canopies, underground piping, concrete footings and aprons, and dispensers at the facility, was removed in June 2024. The previous investigative and monitoring reports and recent fuel system removal indicate that Release #2603 has impacted soil and groundwater above respective risk-based screening levels (RBSLs), as defined in the *Montana Risk-Based Corrective Action Guidance for Petroleum Releases* (DEQ, 2024), within and near the UST basin and dispenser islands.

In June, July, and October 2024, remedial excavation of the former UST basin and eastern and western pump islands and application of PetroFix in the former UST basin were completed under Work Plan #34805. Approximately 2,006 tons (approximately 1,337 cubic yards) of petroleum-impacted material were removed from the site and disposed of at the Big Horn County landfill. Approximately 2,800 pounds of PetroFix were applied to the pooled groundwater, excavation base, and sidewalls of the former UST basin excavation area. Per soil

confirmation samples taken during the 2024 soil excavations, petroleum-impacted soil remained above regulatory action levels for volatile petroleum hydrocarbon (VPH) constituents in the southeast, east, and northeast portions of the former UST tank basin, in the northeast portion of the western dispenser island, and in the southwest, south, southeast, and bottom (9 feet bgs) of the eastern pump dispenser excavation area. Petroleum-impacted soil also remained above regulatory action levels for extractable petroleum hydrocarbon (EPH) constituents in the northeast portion of the former UST basin and in the west, east, and bottom (9 feet bgs) of the eastern dispenser island excavation area. Confirmation samples indicated no EPH constituents above regulatory action levels within the western dispenser island. Details of the remedial action are discussed in the April 2025 Cleanup Report (Pioneer, 2025).

After the cleanup operations under Work Plan #34805 were complete, Pioneer advanced and constructed five monitoring wells (MW24-01, MW24-02, MW24-03, MW24-04, and MW24-05) at the site in December 2024. Three soil samples were submitted for laboratory analysis of VPH and EPH screen. The soil samples were below all respective RBSLs. In March 2025 and September 2025, Pioneer sampled 10 groundwater monitoring wells on site. Monitoring wells MW-3, MW24-01, MW24-03, and MW24-05 had VPH constituents above respective RBSLs for at least one sampling event. Only MW24-01 had a sampling event with EPH constituents above respective RBSLs.

2 OBJECTIVES OF GROUNDWATER MONITORING WORK PLAN

The primary objective of this work plan is to monitor the groundwater response to cleanup activities at the site and to help determine a pathway to remediation and resolution of the release.

In summary, this work plan involves conducting two semi-annual groundwater monitoring events and preparing a Groundwater Monitoring Report appended with a RCP upon completion of all activities. These activities are detailed in the following work plan.

Specifically, this work plan proposes the following actions to achieve these goals:

- Perform two semi-annual groundwater monitoring events.
- Validate all laboratory analytical data using DEQ's Data Validation Summary Form.
- Discuss work plan tasks and results with DEQ's project manager; any modifications required to complete the work plan objectives will be submitted and agreed upon.
- Update the RCP and discuss the results with DEQ's project manager.
- Submit work plan and reports electronically following the Petroleum Tank Cleanup Section submittal requirements.

Pioneer will provide the following services to monitor the current groundwater conditions at the site:

- Task 1: Project Management Planning.
- Task 2: Semi-Annual Groundwater Monitoring.
- Task 3: Reporting.

The following sections describe each task for the proposed work along with Pioneer's cost estimate and proposed schedule.

2.1 Task 1 – Project Management and Planning

Task 1 Project Management and Planning work will include:

- Work plan and cost estimate preparation.
- Project scheduling.
- Health and Safety Plan preparation.
- Coordination with subcontractors, owners, and regulators.
- Site work preparation.

2.2 Task 2 – Semi-Annual Groundwater Monitoring

This work plan proposes performing two semi-annual groundwater monitoring events. During each semi-annual event, Pioneer will gauge all ten existing site monitoring wells (MW-3, MW-4, MW-5, FJ-MW-6-12, FJ-MW-8-12, MW24-01, MW24-02, MW24-03, MW24-04, MW24-05) and will collect groundwater samples from the following six monitoring wells: MW-3, MW24-01, MW24-02, MW24-03, MW24-04, and MW24-05. For each event, the Pioneer team will purge the wells and collect groundwater samples from the aforementioned six monitoring wells. Our team will attempt to complete the sampling events in conjunction with the typically high and low groundwater conditions.

Prior to groundwater sample collection, the team will gauge each of the 10 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 foot. Groundwater samples will be collected in wells that do not contain LNAPL. If LNAPL is detected, the team will not collect any samples, will note the conditions in a logbook, and notify the DEQ project manager.

The groundwater samples will be collected according to low flow sampling techniques. To ensure representative groundwater samples are collected, the team 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 (plus or minus 0.1), dissolved oxygen (plus or minus 10%), specific conductance (plus or minus 3%), oxidation-reduction potential (plus or minus 10 millivolts), and turbidity (plus or minus 10%). To complete groundwater sampling according to DEQ's low-flow sampling guidance (DEQ, 2018), 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 feet) does not occur prior to sampling.

Pioneer's team will collect the groundwater samples with a peristaltic pump and disposable tubing and transfer the samples to the appropriate laboratory containers. The laboratory will supply new, decontaminated containers prior to sample collection. Groundwater samples from all six monitoring wells will be submitted for laboratory analysis of VPH and EPH. Based on their absence during the historical sampling at the site, lead scavengers have been excluded. Samples that exceed the EPH screening level (1,000 micrograms per liter) will undergo fractionation without polycyclic aromatic hydrocarbons (PAHs). For the purpose of this work plan, it is assumed that half of the samples will require fractionation without PAHs.

Analysis of groundwater samples will be in accordance with DEQ's *Risk-Based Corrective Action Guidance for Petroleum Releases* (DEQ, 2024). Pioneer's team will collect one field duplicate during each sampling event. Each sample container will be preserved as directed by the laboratory, labeled, and packaged on ice. The samples will be delivered to Energy Laboratories, Inc. 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.

2.3 Task 3 – Reporting

Pioneer will prepare one Groundwater Monitoring Report, which will include the results of both groundwater sampling events and an updated RCP under this work plan.

Following the second round of groundwater sampling, Pioneer will analyze the results and compile and submit a Groundwater Monitoring Report, prepared according to DEQ's *Montana Report Guidance for Petroleum Releases* (DEQ, 2021) that will include the following:

- Updated site maps, illustrating the locations of the new and existing monitoring wells, underground utilities, and surface features.
- Tables summarizing cumulative laboratory analytical data for the release and comparison of concentrations of petroleum compounds in soil and groundwater to their respective RBSLs listed in DEQ's Risk-Based Corrective Action Guidance (DEQ, 2024).
- Laboratory analytical reports for groundwater samples.
- Logs, field data sheets, and related field data.
- Laboratory data validation.

- Recommendations relevant for further investigation or remedial action.
- An updated RCP.

3 COST ESTIMATE

A detailed cost estimate to perform this scope of work is presented on the worksheet in Attachment 2.

4 SCHEDULES

Pioneer proposes to perform the first groundwater sampling event (Task 2) during early spring of 2026. The second groundwater sampling event will be completed during late fall of 2026. The groundwater monitoring report will be completed and submitted within 45 days of receipt of all laboratory analytical reports for groundwater samples. The full duration of the project is approximately 10 months, and the final report will be issued sometime in the late winter of 2026.

5 REFERENCES

DEQ, 2018. Groundwater Sampling Guidance. Montana Department of Environmental Quality Contaminated Site Cleanup Bureau. DEQ-WMRD-GWM-1. March 6, 2018. Helena, Montana 59601.

Montana Groundwater Monitoring Work Plan and Report Guidance for Petroleum Releases. Montana Department of Environmental Quality, Waste Management and Remediation Division, Petroleum Tank Cleanup Section. March 2021.

DEQ, 2024. Montana Risk-Based Corrective Action Guidance for Petroleum Releases. Montana Department of Environmental Quality. February 2024. Available at https://deq.mt.gov/files/Land/StateSuperFund/Documents/rbca/Update/Final%20RBCA%202024%20Update_Compiled%20PDF.pdf.

Mountain States Petroleum, 1995a. DEQ 30-Day Release Report, 315 13th Street, Hardin, MT Facility ID #02-05752, Release #2603. Mountain States Petroleum, Inc. June 8, 1995.

Mountain States Petroleum, 1995b. DEQ 24-Hour Report, 315 13th Street, Hardin, MT Facility ID #02-05752, Release #2603. Mountain States Petroleum, Inc. May 5, 1995.

Osborne, 1999. Site Assessment Report of UST Sites, Broadway Flying J Trucks Stops in Hardin and Belgrade, Montana. Prepared by Osborne McDevitt EnviroScience, LLC. Prepared for Pacific Environmental Services Company. February 4, 1999.

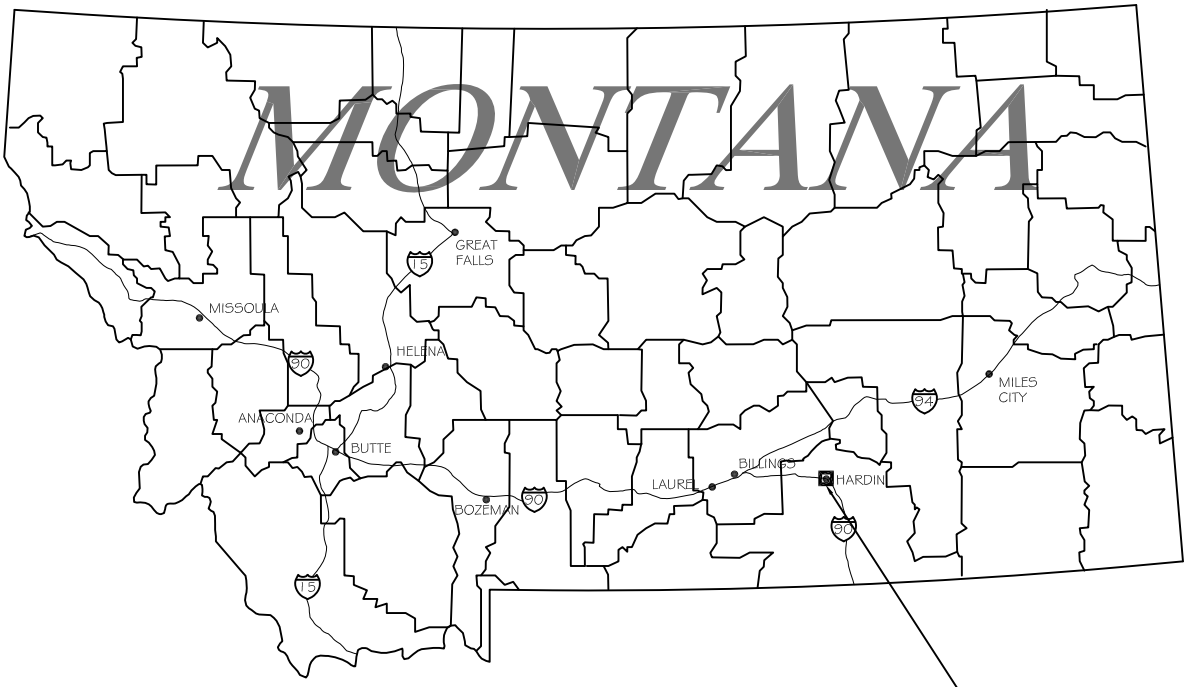
Pioneer, 2024. Additional Corrective Action Work Plan for Petroleum Release at the Former Bair's Truck Stop (Former Broadway Truck Stop), 315 13th Street West, Hardin, Big Horn County, Montana, Facility ID #02-05752, TID #17781, Release #2603, Work Plan ID #34805. March 11, 2024.

Pioneer, 2025. Cleanup Report: Former Bair's Truck Stop (Former Broadway Truck Stop), 315 13th Street West, Hardin, Big Horn County, Montana, DEQ ID #02-05752, TID #17781, Release #2603, Work Plan ID #34805. Prepared for the Montana Department of Environmental Quality. Prepared by Pioneer Technical Services, Inc. April 14, 2025.

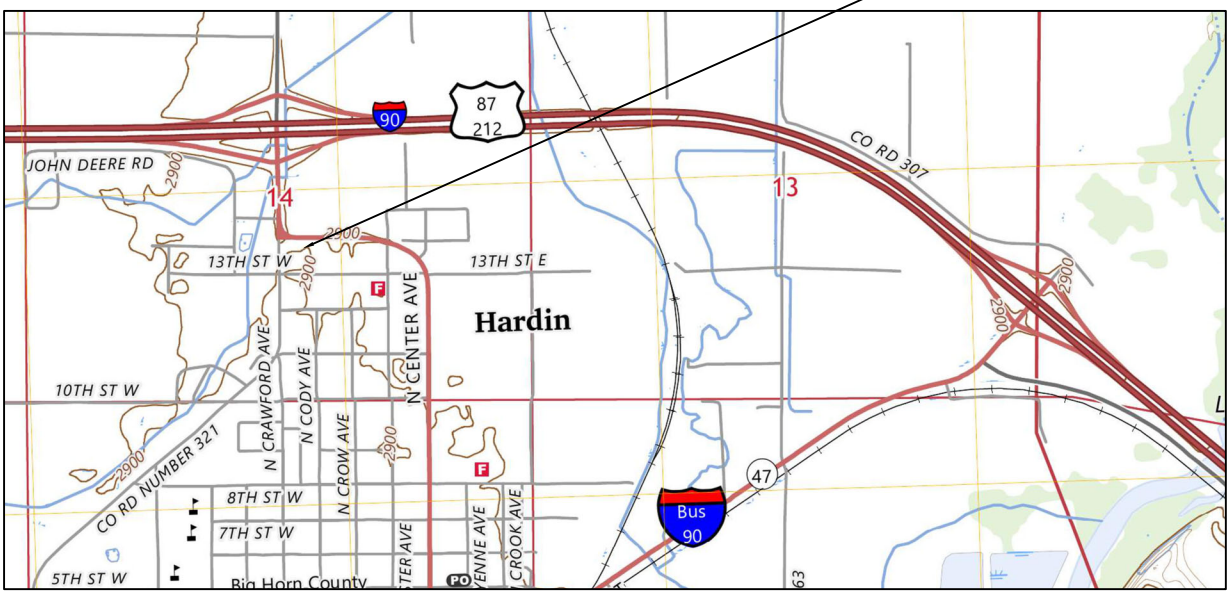
Portage, 2015. Groundwater Monitoring Report, Broadway Truck Stop, 315 13th Street West, Hardin, Big Horn County, Montana, Facility ID 02-05752, Release 2603, Work Plan 7534. Portage, Inc. January 23, 2015

Attachment 1
Figures

Figure 1. Location and Vicinity Map
Figure 2. Site Map



PROJECT LOCATION



SITE VICINITY MAP

DEQ FACILITY ID: 02-05752
RELEASE NUMBER: 2603
WORK PLAN NUMBER: 34805

315 13TH STREET WEST
HARDIN, MT 59034

DISPLAYED AS:
COORD SYS/ZONE: NAD83, NAVD88
DATUM: MSP
UNITS: INT. FEET
SOURCE: BING

SCALE IN FEET
0 1000 2000

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FIGURE 1

FORMER BAIRS TRUCK STOP LOCATION AND VICINITY MAP

DATE: NOVEMBER 2025

11/4/2025 12:21:23 PM Z:\SHARED\ACTIVE PROJECTS\BILLINGSREGIONLUSTPROJECTS\BROADWAYTRUCKSTOP\CADD\FIGURES\2025\BTS-FIG-001-25.DWG

MW MONITORING WELL

MW ABANDONED MONITORING WELL

*MONITORING WELL HAS NOT BEEN LOCATED SINCE 2014

N

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

SCALE IN FEET
0 20 40

FIGURE 2

FORMER BAIR'S TRUCK STOP
SITE MAP

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DATE: JANUARY 2026

1/14/2026 8:27:30 AM Z:\SHARED\ACTIVE PROJECTS\BILLINGSREGIONLUSTPROJECTS\BROADWAYTRUCKSTOP\CADD\FIGURES\2025\BTS-FIG-002-25.DWG