



Resource Technologies, Inc.

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April 15, 2025

Daphne Ryan
Environmental Project Officer
Montana Department of Environmental Quality
Petroleum Tank Cleanup Section
1520 E 6th Avenue
Helena, Montana 59601

Subject: Pre-Excavation Activities Work Plan; Former Saco Conoco; 303 Taylor Street, Saco, Phillips County Montana; Facility ID 36-00573 (TID 26203), Release 2763, Workplan 34936

Responsible Party: Ms. Deborah Taylor
3730 South 76th Drive
Phoenix, AZ 85042, MT 59261
Contact: (406) 690-6681
dbtaylormt@gmail.com

Dear Ms. Ryan,

Pursuant to the DEQ Corrective Action Plan request letter to Deborah Taylor dated September 10, 2024; our phone conversation of April 7, 2025; and your e-mail of April 8, 2025; Resource Technologies, Inc. (RTI), is submitting the following workplan for completing a site visit to the former Saco Conoco located at 303 Taylor Street in Saco, Montana (Figure 1). The site visit is necessary to refine excavation project specifics, locate a local one-time landfarm site, and complete background soil sampling at the proposed landfarm site.

BACKGROUND

The former Saco Conoco is located at 303 Taylor Street in Saco, Montana (Figure 1). Release 2763 was discovered in October 1995 during removal of nine underground storage tanks and product piping. Approximately 80 cubic yards of impacted soil were excavated and landfarmed at that time.

The site is currently owned by Ms. Deborah Taylor. The on-site building is currently used as a fabrication shop. The Taylor's closed the Saco Conoco in 1995; however, four double-wall concrete aboveground storage tanks (ASTs) with cardtrol dispensers were

operated at the site by Ezzie's Wholesale until the mid 2000s. The ASTs have been removed.

RTI conducted a remedial investigation (RI) at the site in 2016. The initial investigation included installation of three groundwater monitoring wells and collection of groundwater samples. The investigation identified soil and groundwater impacts on the south side and to the west of the facility building. RI results are documented in *Final Abbreviated Site Investigation Report, Saco Conoco* dated September 14, 2016.

CTA Environmental conducted additional remedial investigation in 2020 that included installation of seven soil boreholes with five of the boreholes completed as groundwater monitoring wells. Soil impacts exceeding applicable Montana Tier 1 Risk Based Screening Levels (RBSLs) were identified in boreholes SB-1 and SB-2, and monitoring well boreholes MW-2 through MW-5 (Figure 2). RI results are documented in *Report of Remedial Investigation, Former Saco Conoco Station* dated October 27, 2020.

In 2022, RTI conducted additional RI activities that included installation of seven additional monitoring wells (MW-6 through MW-12) and collection of soil and groundwater samples. RI results are documented in *Phase III Remedial Investigation Report, Former Saco Conoco* dated July 18, 2022.

The three phases of RI successfully delineated the extent of soil and groundwater impacts. Soil impacts reside in the former UST area south of the site building and extend into Taylor Street. Soil impacts also reside on the southwestern portion of the property. Soil impacts are generally encountered at depths of six to 12 feet. Due to site soils being composed primarily of tight clay, in-situ remediation of soil impacts is not a practical option. Consequently, excavation of impacted soils has been chosen as the preferred remedial option. A site map with the anticipated extent of excavation is included as Figure 2.

SCOPE OF WORK

The nearest landfill where impacted soil could be disposed is the Valley County Landfill in Glasgow, an approximate 100 mile round-trip haul from the site. Consequently, RTI has determined that permitting a one-time landfarm in the Saco area for surface treatment of excavated soil will be a more cost effective disposal option than landfill disposal. RTI has discussed landfarming with the site owner who has indicated they have land available for siting a one-time landfarm.

The primary objective of this workplan is to locate a one-time landfarm site, document the location and conditions at the proposed landfarm, and collect the required background soil samples. The disposal location must be determined prior to soliciting subcontractor bids for excavation and hauling.

Additional objectives of the site visit include meeting Town of Saco personnel; determining the locations, burial depths, and construction of utilities located in Taylor Street that may be impacted by excavation; determining the extent of US Highway 2 right-of-way and whether excavation will extend into that right-of-way; determine how much paved surface in Taylor Street will be disrupted; determine Town requirements for encroachment, backfilling, and repaving; and determine what monitoring wells will be abandoned prior to excavation.

Specific tasks include:

- Travel to Saco;
- Meet representative of site owner and view potential landfarm sites;
- Photodocument potential landfarm sites;
- Collect background soil samples at preferred landfarm site in accordance with DEQ Solid Waste Division requirements;
- Meet Town of Saco personnel to determine what Town will require for project to be completed;
- Prepare excavation specifications based on information obtained during site visit and location of landfarm;
- Prepare excavation workplan as described in DEQ Workplan Request Letter dated September 10, 2024.

Project Management

RTI will coordinate site visit date and meeting times with site owner representative and Town of Saco personnel.

Landfarm Siting

RTI will discuss attributes of appropriate landfarm sites with site owner representative prior to site visit. Appropriate landfarm attributes are described in DEQ Solid Waste Division *Guidelines for Establishing One-Time Landfarms for Remediation of Hydrocarbon Contaminated Soils*. RTI and site owner representative will inspect potential landfarm sites, RTI will document preferred landfarm location by Township and Range and latitude and longitude; RTI will photograph preferred landfarm site; and RTI will collect background soil samples for Volatile Petroleum Hydrocarbons (VPH) and Extractable Petroleum Hydrocarbons (EPH) analyses.

Meet Town of Saco Personnel

RTI will contact the Town of Saco prior to the site visit to determine Town personnel that RTI will be working with during the project. RTI will schedule a meeting with town personnel on site to demonstrate the anticipated extent of excavation; determine if excavation is likely to approach sewer and water utilities underlying Taylor Street; discuss potential procedures if impacted soil intersects utility corridors; and determine Town requirements for encroachment, backfilling, and repaving.

Site Inspection

RTI will inspect the excavation area to assess if there are any obstructions to be moved or removed prior to excavation.

Reporting

Information obtained during the site visit will be incorporated in the Soil Excavation Corrective Action Plan as requested in the DEQ Corrective Action Plan request letter dated September 10, 2024.

SCHEDULE AND BUDGET

Following approval of this work plan by MDEQ, we anticipate completing the site visit within two weeks. RTI will submit the Corrective Action Workplan within 30 days of completing the site visit.

The attached cost estimate provides a breakdown of costs for activities described in this workplan. The total estimated cost for the site visit and Corrective Action Plan Preparation is \$5,716.00.

Respectfully Submitted,
Resource Technologies, Inc.



Joe Laudon
Senior Geologist

Attachment

cc: Deborah Taylor

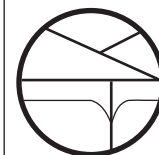
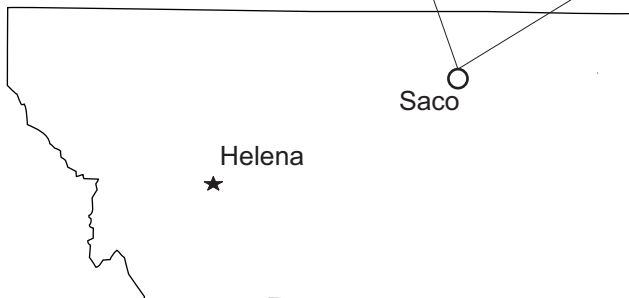
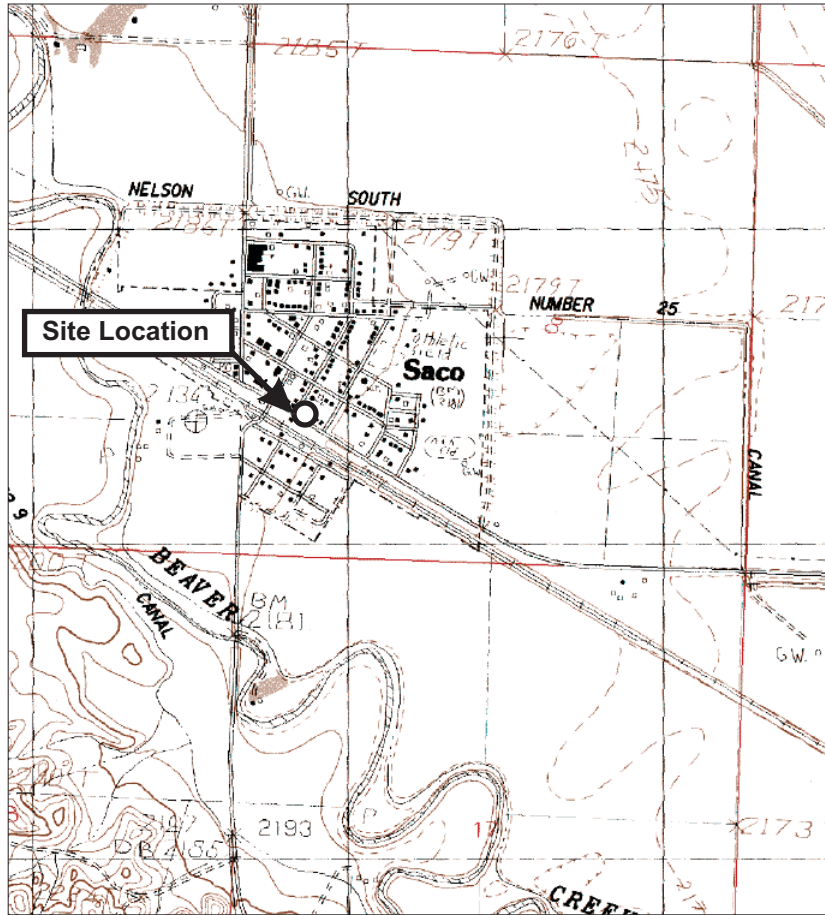


Figure 1

Site Location Map
Former Saco Conoco
Saco, Montana

Resource
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