Olympus Technical Services, Inc.

Revised February 13, 2026

Eric Krueger
Montana Department of Environmental Quality
Petroleum Tank Cleanup Section
P.O. Box 200901
Helena, MT 59620-0901

Re: Groundwater Monitoring Work Plan Required for the Petroleum Release at the Former GW Sales Bulk Plant, BNSF Right-of-Way
Stanford, Judith Basin County, Montana
Facility ID No. 23-12064 (TID 31119); Release No. 2766
DEQ Work Plan ID No. 35148
Olympus Work Order No. A5015

Dear Mr. Krueger:

Olympus Technical Services, Inc. (Olympus), on behalf of Wyatt Woodhall Estate with Woodhall Distributing (Woodhall), is submitting this Groundwater Monitoring Work Plan for the above-referenced facility (Site). The Montana Department of Environmental Quality (DEQ) Petroleum Cleanup Section requested a Groundwater Monitoring Work Plan in correspondence dated February 10, 2026. The purpose of the work is to monitor petroleum-contaminated groundwater at the Site and evaluate the effects of soil removal performed in 2024. Additionally, work will also include passive non-aqueous phase liquid (NAPL) recovery. This will be achieved by performing two years of semiannual groundwater monitoring, installation of NAPL recovery socks, and preparing and submitting a Groundwater Monitoring Report, Interim Data Submittals (IDS), and updating the Release Closure Plan (RCP) detailing the results of the investigation and path for closure of the release.

Site Description

This Site is located along County Road 202, off 4th Avenue North, in Stanford, Montana. The approximate coordinates are 47.15555 degrees latitude, -110.21666 degrees longitude. The coordinates were obtained via Google Earth. The Site is located on the BNSF Railway Right-of-Way and lies within Section 16, Township 16 North, Range 12 East, Principal Meridian, Montana. The Site is bordered by BNSF rail lines to the west, 4th Avenue North to the north, Main Street to the south, and Calvary Community Church Property to the east. The Site consists of a looping gravel drive, and native vegetation. The Site is no longer in operation and all Site infrastructure has been removed. Some farming equipment is staged on the Site but is outside of the investigation area. A Topographic Map, Aerial Photograph map, and Site Map are included as Figures 1, 2, and 3, respectively.

Site History

The property is located on BNSF Railway Company (BNSF) property that has been leased to several tenants. The Site was leased to Continental Oil Company (Conoco) in the early 1940s for storing and selling bulk oil products, until the property was leased to Stanford Oil Company in 1945 for the storage of bulk petroleum products. Mr. George Woodhall, acquired the lease in 1981 for the purpose of storing bulk petroleum products and maintaining two warehouses, and several aboveground storage tanks (ASTs). The Woodhall Estate is the current lessee of the

property. A release was reported to DEQ in August 1995 when approximately 25 gallons of diesel overfilled an AST during a product delivery. At the time of the release, seven ASTs were operating at the Site. Woodhall Distributing ceased operation by 2003, and the Site has been abandoned since. All infrastructure remaining onsite was removed in 2021 prior to a remedial excavation.

Previous Site Investigations

A Limited Phase I/II Environmental Site Assessment was completed by NTL Engineering and Geoscience, Inc. (NTL) in 1995. Results of the investigation revealed the property to be developed with improvements including two oil storage buildings, a pump house, seven ASTs with piping systems, and a fuel loading/unloading rack area with concrete slab. A 24-hour initial release response report was submitted in August 1995 after a release from the ASTs was discovered during tank/piping removal. Four test pits (TPs) were excavated in August 1995 and soil samples were collected from three of the TPs. Elevated levels of petroleum hydrocarbon contaminants were detected in the soil near the loading/unloading rack and ASTs. Soil was excavated in two locations in October 1995 along the north side of the bulk plant near the diesel fuel fill pipes and along the east side of the bulk plant near the vertical AST. Soil samples were collected from both excavations, and elevated levels of diesel compounds were detected in both excavations. A minor amount of discolored soil was left in place due to physical obstacles. A 30-day release report was submitted in October 1995.

In January 1996, a Limited Phase II Remedial Investigation (RI) was completed by NTL. One soil boring was advanced and completed as a monitoring well (MW-1) near the area with the highest subsurface contamination. Soil recovery rates were limited during the RI, and one soil sample was collected from the boring. It was indicated by NTL that minimal petroleum hydrocarbon contamination was present in the upper 20 feet of the boring. One groundwater sample was collected from well MW-1, and low concentrations of diesel compounds and gasoline compounds were detected. SWLs were measured in well MW-1 at 18.66 feet below ground surface (bgs). Well MW-1 was sampled again in April 1996. The data from these two groundwater samples indicated the presence of low concentrations of gasoline and diesel compounds.

In November 1996, an additional soil boring was advanced and completed as a monitoring well (MW-2) near the eastern end of the fueling/unloading rack. Soil recovery rates were limited during this portion of the RI, and one soil sample was collected from the boring. NAPL was observed in well MW-1 and it was not sampled. One groundwater sample was collected from the newly installed well MW-2. The data indicated the presence of low concentrations of gasoline and diesel compounds. A Keck Free Product Recovery canister was placed in well MW-1 in November 1996 to begin passive recovery of NAPL from the well. The canister was being checked every three to four days by the Site owner.

Semiannual groundwater monitoring was conducted by NTL in 1997. NAPL was not detected in February 1997 in well MW-1. The Keck Free Product Recovery canister was removed from the well and had collected approximately one gallon of NAPL since November 1996. The monitoring data indicated that hydrocarbon concentrations had increased in well MW-1, and decreased in well MW-2, and that a dissolved phase plume existed in the groundwater near the heating fuel tank with moderately high concentrations of hydrocarbon contamination. The Site was requested for closure by NTL.

An additional RI was conducted by NTL in 1998 to determine regional groundwater flow using domestic groundwater wells on several neighboring properties. Three wells (the Worm well, the Baker well, and the Calvary Church well) were selected based on their proximity to the Site and the depth of the wells. The three wells were surveyed by NTL and their SWLs were recorded with an interface probe. The two Site wells were also gauged. NAPL was observed in Site well MW-1, and the well was purged, and the free product was placed in a barrel at the Site that was used previously for a similar purpose. Groundwater was sampled from both Site wells, MW-1, and MW-2. The results of the RI indicated high concentrations of diesel compounds still existed near well MW-1. The increase in diesel compounds in the analytical results from April 1998 can likely be attributed to the presence of NAPL in the well. A minor amount NAPL was recovered from well MW-1 on several occasions in 1998 by NTL during the monitoring events and by the Site owner. The potentiometric surface of the groundwater in the region was determined to slope in a northeast direction at a calculated gradient of 0.014 ft/ft. The Site was requested for closure by NTL, with the recommendation that well MW-1 continued to be monitored for the presence of NAPL, and that any accumulated free product be removed and placed in the storage barrel on Site.

A limited Phase II Assessment of the Site was conducted by Environmental Management Resources, Inc. (EMR) in July 2003. At the time of the assessment, the property was out of operation and abandoned. Current improvements included two warehouse/storage buildings, one loading rack, one pump house, six empty ASTs, one concrete pad located near the loading rack, and a chain-link fence and an earthen berm surrounding the storage tank farm. Seven underground storage tanks (USTs) that were excavated from a fuel station off parcel and discarded on the property, three abandoned vehicles, and several discarded fuel pumps and piping located adjacent to the north warehouse storage building were also observed on the property. One circular gravel access road covered the central portion of the property. Also noted were several small concrete piles, and a flush-mount monitoring well. Surface petroleum staining was noted beneath the pump house and the loading rack. The two buildings were not accessible; but discarded fuel pumps and hose were observed inside the buildings. The interior floor appeared to be petroleum-stained. Four soil borings were advanced to depths ranging from 7- to 11-feet bgs. Soil samples were collected continuously during advancement of the borings, and four samples were submitted for laboratory analysis at depths ranging from 2- to 11-feet bgs. Groundwater samples were not collected.

Olympus performed additional RI activities at the site in August 2021 and April 2022. The activities included the advancement of 12 soil borings (GP-5 through GP-16) to depths ranging from 4.5 feet to 25 feet bgs. Soil borings were drilled near locations of the former AST, loading rack, pump house, and storage building. Olympus returned to the site in April 2022 and installed five soil borings (MW-3 through MW-7) to depths of approximately 30 feet bgs. Borings MW-3 though MW-7 were completed as monitoring wells. Risk-based Screening Levels (RBSLs) for VPH and EPH compounds, and SVOCs, were exceeded in soil samples GP-7-3, GP-12-3, and GP-14-2, all of which are located at the approximate center, or near, the locations of the former loading rack and pump house. Additional composite soil sampling indicated direct contact RBSLs exceedances for VPH and EPH compounds from the 0 to 1.9-foot interval and 2.1 to 9.9-foot interval at the location of the former loading rack. Groundwater sampling results indicated a Human Health Standard (HHS) exceedance for benzene in MW-4, and exceedances of HHS/RBSLs in MW-7 for benzene, toluene, naphthalene, C9-C10 aromatics, C5-C8 aliphatics, and C9-C12 aliphatics. Based on the results of the additional RI activities, soil contamination extends to approximately 27 feet bgs in the approximate location of the former loading rack. Additionally, groundwater results indicate that the contaminated soil is leaching into and affecting the groundwater.

In 2024 and 2025, Olympus performed corrective actions, well reinstallation, and groundwater monitoring at the Site. Approximately 890 tons of impacted soil was excavated and disposed of offsite. Post-excavation confirmation soil samples were all reported below EPA 95% UCLs or Tier 2 RBSLs. The objective of the remedial excavation was to remove direct contact construction exceedances and it was acknowledged that deeper impacts, near MW-4, remained at the Site. Subsequent to the excavation, three monitoring wells were reinstalled (MW-1R, MW-2R, and MW-4R) and one new monitoring well was installed (MW-8). Two rounds of semiannual groundwater monitoring were performed and impacts above the HHS/RBSLs were detected in wells MW-1R, MW-2R, and MW-8 as well as NAPL in MW-7.

Scope of Work

The scope of work consists of the following primary tasks:

Task 1 – Work Plan

This letter fulfills DEQ's request for a Groundwater Monitoring Work Plan.

Task 2 – Project Management

Project management will include coordination with DEQ client, and Petroleum Tank Release Compensation Board (PTRCB) personnel; preparation of the Site Health and Safety Plan; project planning; scheduling; oversight of project details, equipment, and personnel; setup of project files; reviewing historical reports, maps and data for the facility; and other various tasks related to project management. The costs for project management are included in Task 2 of the cost estimate.

Task 3 – Mobilization

Task 3 in the cost estimate details mobilization costs out of our Billings, Montana office for:

- Monthly trips (24 total) for a Technician III to check and replace absorbent socks for passive NAPL recovery to be placed in M7. Based on the recovery amounts trips may be decreased to bi-monthly; and,
- Four mobilizations for a Technician III to complete groundwater monitoring during each sampling event (4 events) with mobilization costs included for lodging in Lewistown, Montana.

Task 4 – Fieldwork (NAPL Recovery)

Task 4 includes costs for a Technician III to check and replace absorbent socks (monthly) in MW-7 for one to two years. Used socks will be placed in a 55-gallon drum stored at the Site. The socks will be weighed before and after to determine NAPL recovery amounts. Inspections may be decreased based on NAPL recovery amounts. Once recovery efforts are completed the drum will be picked up, transported, and disposed of by Mountain States Environmental Services. Cost for disposal are approximate and will be billed at actual costs for disposal.

Task 5 – Monitoring (Groundwater)

Groundwater monitoring will be conducted semi-annually for two years during high groundwater (Spring 2026) and low groundwater (Fall 2026). Monitoring will include:

- Measurement of groundwater static water levels (SWLs) in all eight Site monitoring wells during each groundwater monitoring event using an electronic water level probe.

- Collection of groundwater samples from all eight Site wells and one field duplicate per event, using low-flow methods in general accordance with DEQ's *Groundwater Sampling Guidance*. Groundwater samples will be collected with a peristaltic pump. Field measurements of groundwater quality parameters, including pH, oxidation-reduction potential, specific conductivity, dissolved oxygen, and turbidity, will be recorded during groundwater sample collection. Depth to groundwater measurements will be recorded during the low-flow pumping and sampling procedure. Purge water will be disposed of in accordance with DEQ's *Disposal of Untreated Purge Water from Monitoring Wells*, dated July 27, 2025.

- All groundwater samples will be submitted for laboratory analysis of volatile petroleum hydrocarbons (VPH), extractable petroleum hydrocarbons (EPH) screen, and intrinsic biodegradation indicators (IBIs) (last high-groundwater event only) including dissolved ferrous iron, methane, sulfate, and nitrate+nitrite as nitrogen. The cost estimate assumes up to 50% of samples may require further fractionation of EPH compounds. PAHs will also be analyzed for groundwater samples collected from MW-4R and MW-8. The field duplicate sample will be analyzed for VPH only.

Task 5 in the cost estimate includes the costs for project setup, mobilization, and well sampling on a unit cost basis. A groundwater monitoring worksheet is attached to this work plan.

Task 6 – Lodging/Per Diem

Task 6 includes per diem and lodging costs for two days and one night during each sampling event. Lodging will be reserved in Lewistown, MT.

Task 7 – Laboratory Analysis w/ Fee (Groundwater Monitoring)

Task 7 in the cost estimate presents the laboratory analytical costs for the four groundwater monitoring events. Groundwater samples will be analyzed for VPH, EPH screen, and IBIs (last high-groundwater event only) including dissolved ferrous iron, methane, sulfate, and nitrate+nitrite as nitrogen. The cost estimate assumes up to 50% of samples may require further fractionation of EPH compounds. PAHs will also be analyzed for groundwater samples collected from MW-4R and MW-8. Samples will be submitted to Energy Laboratories, Inc. in Billings, Montana (Energy). One duplicate will be collected during each event and analyzed for VPH only.

Task 8 – Data Validation

Task 8 in the cost estimate includes four hours of staff scientist time to validate analytical data for each sampling event.

Task 9 – Interim Data Submittal

An IDS will be prepared and submitted after the first three sampling events. After each sampling events decisions will be made regarding the frequency of NAPL recovery efforts, its effectiveness, and if NAPL recovery should continue. The IDS will include a cover letter, figures, tables, groundwater sampling forms, data validation summary forms and review, and laboratory analytical reports. Task 9 of the cost estimate includes unit cost prices for completing the IDS.

Task 10 – Release Closure Plan

The Release Closure Plan will be updated for the Site. Task 10 of the cost estimate includes unit cost prices for completing the RCP.

Task 11 – Reporting

A Groundwater Monitoring Report will be prepared following the fourth sampling event in accordance with the DEQ *Montana Groundwater Monitoring Work Plan and Report Guidance for Petroleum Releases* Guidance. Task 11 of the cost estimate includes unit cost prices for completing the report.

Cost

The cost to complete the scope of work outlined above is estimated at $76,188.80, detailed on the attached cost schedule. The cost estimate is based on the following assumptions:

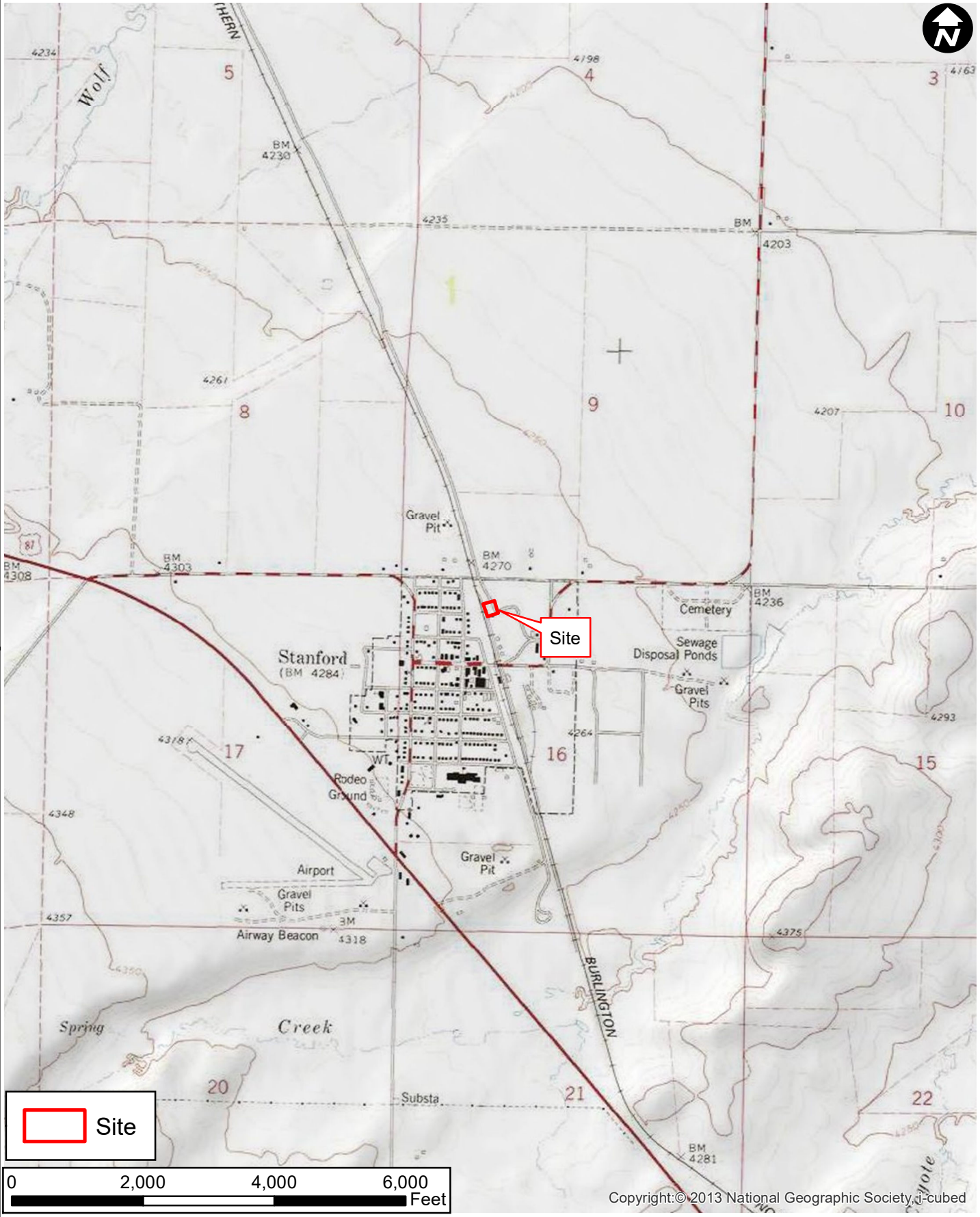
- Existing Facility wells do not require replacement or repair;
- Semi-annual groundwater sampling will be conducted for two years;
- Only one drum will be required for spent sorbent sock storage; and,
- Disposal of the sorbent sock storage drum will be handled by MSES and will be invoiced at actual cost for disposal.

Please contact me if you have any questions regarding this plan.

Sincerely,

Ethan J. Perro, PG
Project Geologist

Attachments: Figure 1: Topographic Map
Figure 2: Aerial Photograph
Figure 3: Site Map
Work Plan Cost Estimate
Groundwater Monitoring and Sampling Unit Cost Worksheet
SOPs



Olympus Technical Services, Inc.	Topographic Map	FIGURE 1

Olympus Technical Services, Inc.	Aerial Photograph	FIGURE 2

Olympus Technical Services, Inc.	Site Map	Figure 3