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October 7, 2024

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

RE: Cleanup Work Plan for Petroleum Release at the Superpumper 74 (Former Conomart #4) 1240 South 27<sup>th</sup> Street, Billings, Yellowstone County, Montana Facility ID #56-00503, TID #29716, Release #3189, Work Plan ID #34924

Responsible Party:	C-Store Properties 11C	Consultant/ Work Plan Preparer:	Ploneer Technical
	Dennis Whitmore		Charles Peterson, 2310 Broadwater A
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Pioneer Technical Services, Inc. Charles Peterson, P.G. 2310 Broadwater Ave, Suite 1 Billings, MT 59102 <u>cpeterson@pioneer-</u> <u>technical.com</u>

Dear Mr. Shearer:

On behalf of C-Store Properties, LLC., Pioneer Technical Services, Inc. prepared the following Cleanup Work Plan and cost estimate for performing corrective action work at the Superpumper 74 (Former Conomart #4) facility in Billings, Montana. As requested in correspondence dated August 22, 2024, 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, P.G. Program Manager Pioneer Technical Services, Inc.

Attachment 1: Figures Attachment 2: Cost Estimates

cc: Mr. Dennis Whitmore, C-Store Properties, LLC., PO Box 80391, Billings, MT 59108





### **EXECUTIVE SUMMARY**

The purpose of this document is to provide a Cleanup Work Plan (work plan) for the Superpumper 74 (former Conomart #4) facility (site), located at 1240 South 27<sup>th</sup> Street, Billings, Yellowstone County, Montana, Facility ID #56-00503, as requested in electronic correspondence from Montana Department of Environmental Quality (DEQ) dated August 22, 2024. The purpose of the proposed work activities is to further clean up the petroleum source within the saturated zone associated with Release #3189 to the extent practicable via *in situ* remediation fluid injections, conduct groundwater monitoring events to evaluate the cleanup results, evaluate the potential for vapor intrusion, and to propose additional remediation work, if needed, and determine a pathway to resolve Release #3189.

Despite past remedial actions and monitored natural attenuation trends, residual petroleum impacts from former site use remain at the facility, mainly below the capillary fringe of the groundwater. These impacted zones contain subsurface soil with residual petroleum impacts above respective DEQ risk-based screening levels (RBSLs). The petroleum-impacted soil is actively contributing dissolved-phase petroleum hydrocarbons to the site's groundwater and is preventing closure of Release #3189.

Discussions between DEQ, C-Store Properties, LLC (responsible party), and Pioneer Technical Services, Inc. (Pioneer) defined the scope of this work plan, which includes the application of a remediation fluid, semi-annual groundwater monitoring, evaluation of the risk of vapor intrusion, and project reporting.

The DEQ outlined these recommendations in the work plan request letter dated August 22, 2024. These recommended actions are included in this work plan, which involves performing application of the remediation fluid PetroFix<sup>®</sup> (PetroFix), conducting two semi-annual groundwater monitoring events following remediation fluid application, evaluating the risk of vapor intrusion, and preparing a groundwater monitoring report after the first groundwater monitoring event and a cleanup report appended with a Release Closure Plan (RCP) upon completion of all activities. These activities are detailed in the following work plan.



### **1** FACILITY SUMMARY AND CURRENT CONDITIONS

### 1.1 Site Description

The Superpumper 74 (former Conomart #4) facility is located at 1240 South 27<sup>th</sup> Street, in Billings, Montana, at the corner of South 27<sup>th</sup> Street and State Avenue. The property (or site) is fairly level with an elevation of approximately 3,118 feet above mean sea level. The site is located at a busy intersection and is surrounded by roadways and other commercial properties. The site is a rectangular-shaped parcel that is bordered by South 27<sup>th</sup> Street to the east, State Avenue to the south, and 12<sup>th</sup> Avenue South to the north. A restaurant/casino property is adjacent to the west. This area of the city is served with public utility city services (potable water and sanitary and storm sewer). The site location is shown on the Location and Vicinity Map (Figure 1) and Site Map (Figure 2) provided in Attachment 1.

Currently, the site is developed as a convenience store and retail fueling facility. It is occupied by a one-story, slab-on-grade, brick and masonry building and metal fueling canopy and fuel dispensing islands. It is surrounded by a concrete asphalt lot with parking areas and landscaped lawn. Three underground storage tanks (USTs) are located to the east of the store building, which is located on the northwest corner of the site along South 27<sup>th</sup> Street. A large retail fueling area is located in the center of the site and is covered with a metal canopy. The eastern and southern borders are landscaped with grass, trees, and curb and gutters. The western portion is bordered by a city alley.

Eight groundwater monitoring wells, installed in 1999 and 2013, are located on the site. The groundwater monitoring well network is spread across the site, and existing groundwater testing results indicate that the dissolved-phase gasoline plume is limited to the southeastern portion of the site. No light non-aqueous phase liquids (LNAPLs) have been measured at the site since monitoring began in 1999.

### **1.2** Historical Operation of Petroleum Storage Tanks at the Facility

The Superpumper 74 (former Conomart #4) facility has been operated at this location as a retail gasoline sale facility since the 1970s by the former owner, G.M. Petroleum, Inc. (G.M. Petroleum). The facility is currently owned by Parkland Corporation, Inc. In the fall of 1998, the original retail sales store building and associated UST systems were completely removed and replaced with the current existing building and fueling systems. The former facility was composed of a single story, slab-on-grade, wood and masonry convenience store building and the UST basin and fueling islands, which were all located in the southwestern portion of the site. The new building and UST system (with three USTs) are now located at the north and northeastern portion of the site. The former UST system had three USTs (two 10,000-gallon steel tanks and one 6,000-gallon steel tank) and four pump islands, each containing two dispensers. The former locations of these features are shown on the Site Map, Figure 2, in Attachment 1.

According to a DEQ file review, there were two generations of USTs at the facility. The first set consisted of three tanks located to the southwest of the former facility building. These were



installed in the 1970s and removed in 1998. The second and current set consists of three tanks located in the northeastern portion of the site. This second set of tanks was installed in 1998 and remains in use today.

G.M. Petroleum operated the first set of USTs associated with the facility. During the removal of this set in 1998, it was determined that a release had occurred at the UST basin. In response, DEQ was notified, and the 30-day release was filed. The Petroleum Tank Release Compensation Board (Petro Board) determined that the G.M. Petroleum facility was eligible for cost reimbursement. No compliance violations were noted. Details on the 1998 UST removal and subsequent actions are summarized in the sections below.

#### 1.2.1 1998 UST Removal

During removal of the USTs in 1998, gasoline-impacted soil was encountered in the former UST basin. The release was reported to DEQ, and the site information was submitted for eligibility consideration to the Petro Board. The Petro Board deemed the site eligible for reimbursement of cleanup costs and assigned it Release #3189.

The former USTs were located behind the old station building to the southwest. The two 10,000gallon USTs stored unleaded and plus-grade gasolines, while the 6,000-gallon tank held a super unleaded grade. The fuel was dispensed at four separate dispenser islands located to the east and south of the building.

Review of the DEQ file of the tank removal efforts indicates that soil samples were collected below each end of each tank, below each of the four pump islands, and along the supply and vent line piping runs. These samples were tested for gasoline range organics. The test results indicated that most samples were below action levels except for the east end of the 6,000-gallon UST and the east end of the southernmost 10,000-gallon UST. These samples contained total purgeable hydrocarbons at concentrations of 3,900 milligrams per kilogram (mg/kg) and 2,700 mg/kg, respectively. The depth from which these samples were collected is unclear, but it is noted that they were collected from above water, and water was at 8 feet below ground surface (bgs) at the time of the removals. It can be assumed that these samples were collected from between 6 to 8 feet bgs.

The tank/piping closure forms from permit number 98-0595 indicate that the two 10,000-gallon tanks were rusted but in good condition, whereas the 6,000-gallon tank was rusted and perforated. Based on the condition of the tanks when they were removed in conjunction with the result of the soil samples collected below the 6,000-gallon UST, it can be assumed the main source of the release was from the super unleaded 6,000-gallon UST. Additionally, overfills during filling events were common during these years of operations, and it is likely that overfills were a contributing source of the release. The results of the soil samples collected from below the underground piping and dispenser islands contained much lower concentrations than samples collected in the immediate vicinity of the former USTs. This indicates that these areas did not experience releases.



The file review found that after the tanks were removed from the subsurface, gasoline-impacted soil was removed and disposed of in the Billings Regional Landfill. Approximately 400 cubic yards of soil were excavated in this effort and replaced with clean fill material. No information was available in the file that showed the extent of the excavation or if samples were collected from the base of the excavation. The depth of the excavation appears to have not exceeded the groundwater depth of 8 feet. No confirmation soil sampling results were available in the files reviewed.

#### 1.2.2 1999 Groundwater Well Installation and Sampling

In response to the release and after the UST basin was over-excavated of petroleum-impacted soil, DEQ requested that the facility undergo a subsurface remedial investigation. In September 1999, after the new facility was constructed, four soil borings were installed at the facility and constructed into groundwater monitoring wells. All four of these wells remain at the facility. Soil and groundwater samples were collected at the time of well installation from each of the four borings (MW-1 through MW-4) at a depth of 5 to 7 feet bgs and submitted for laboratory analyses. Each sample was analyzed for extractable petroleum hydrocarbons (EPH) and volatile petroleum hydrocarbons (VPH) in accordance with the January 1998 Massachusetts Department of Environmental Protection (MADEP) methods as modified by DEQ. The borings were then constructed into 2-inch groundwater monitoring wells.

Results of the 1999 soil testing showed that no VPH constituents were present above detection limits in any of the four samples collected. Results of the groundwater sampling showed that only one of the wells contained VPH constituents above the respective RBSLs; well MW-1 contained benzene at the concentration of 11 micrograms per Liter ( $\mu$ g/L). Results indicated that the gasoline release was not widespread and that no impacts to soil or groundwater had occurred along the assumed downgradient (eastern) portion of the site along South 27<sup>th</sup> Street.

#### 1.2.3 2000 Quarterly Groundwater Monitoring

During 2000, as requested by DEQ, four quarterly sampling events were conducted at the site. The results showed that each of the four wells contained trace levels of VPH constituents; however, none of the concentrations were above the respective RBSLs, and closure was recommended by the consultant conducting the events. Between 2000 and 2012, no other work was performed at the site. In 2013, a Phase II Remedial Investigation was completed to further investigate the area near and surrounding the former UST basin (see Section 1.2.4).

#### 1.2.4 2013 Groundwater Well Installation and Sampling

To further investigate the magnitude and extent of the releases near the former UST basin, DEQ requested additional subsurface soil and groundwater investigations. On July 18, 2012, DEQ requested that G.M. Petroleum prepare and submit a Standardized Soil Boring and Monitoring Well Installation Work Plan. On September 21, 2012, Northern Industrial Hygiene, Inc. submitted a Phase II Remedial Investigation Work Plan, which was approved by DEQ on December 7, 2012. Between February and April 2013, Northern Industrial Hygiene, Inc. completed the investigation, which included screening soil, installing monitoring wells, and collecting and analyzing groundwater



samples. Soil borings were advanced to 13 feet using a BK-81 truck-mounted drill rig equipped with 8.5-inch outside diameter hollow-stemmed augers, and the borings were completed as monitoring wells. The additional wells and borings helped to further determine the extent and magnitude of the gasoline impacts from the former UST system (Northern Industrial Hygiene, Inc., 2013).

The monitoring well locations were selected based on the groundwater gradient and the former locations of the USTs, underground supply piping, and fuel pump islands. One well (MW13-05) was located to the south of the new store building. Two other wells (MW13-06 and MW13-07) were located west of the current pump island canopy. The fourth well (MW13-08) was located south of the pump island canopy.

Soil samples were collected from the depths of 5 to 7 feet from each of the borings and submitted to Energy Laboratories, Inc. (Energy) in Billings, Montana, for EPH screen and VPH analyses. The results showed that gasoline-impacted soil exists in and around the former UST basin both above and below the groundwater interface. The highest concentrations were present in the samples collected from MW13-07 and MW13-08 from a depth of 5 to 7 feet bgs. These samples contained total purgeable hydrocarbons at concentrations of 1,250 mg/kg and 1,290 mg/kg, respectively. Results for groundwater collected from wells MW13-06, MW13-07, and MW13-08 all contained VPH constituents above the respective RBSLs (Northern Industrial Hygiene, Inc., 2013).

#### 1.2.5 2016 Groundwater Monitoring

To further monitor the magnitude and extent of the dissolved-phase plume near the former UST basin, DEQ requested additional groundwater monitoring at the site. On December 21, 2015, DEQ requested that Petro Services Company, Inc. prepare and submit a Standardized Generic Application Work Plan. On January 28, 2016, Portage, Inc. submitted a Groundwater Monitoring and Evaluation of Cleanup Alternatives Work Plan, which was approved by DEQ on February 8, 2016. On May 6, 2016, Portage submitted a groundwater monitoring report, which detailed the results of a monitoring event performed on March 15, 2016. Results for groundwater collected from wells MW13-06, MW13-07, and MW13-08 all contained VPH constituents above the respective RBSLs (Portage, 2016).

#### 1.2.6 2018 Groundwater Monitoring

Based on the results of the 2016 groundwater monitoring, DEQ determined that additional monitoring and evaluation of natural attenuation was required to determine a pathway to remediation and closure of the release. On October 25, 2017, DEQ requested that Petro Services Company, Inc. prepare and submit a Standardized Groundwater Monitoring Work Plan for 2 years of groundwater monitoring. In response (under contract to Petro Services Company, Inc.), Pioneer submitted a Standardized Groundwater Monitoring Work Plan on December 18, 2017, which was approved by DEQ on December 19, 2017. The Petro Board also approved the costs associated with the work plan in a letter dated March 7, 2018.

Pioneer completed two sample events during 2018. One monitoring event occurred in April 2018 and one event occurred during October 2018. The results of these monitoring events were



presented in a summary report dated December 12, 2018. Results for the 2018 groundwater monitoring continued to demonstrate that wells MW13-06, MW13-07, and MW13-08 all contained VPH constituents above the respective RBSLs (Pioneer, 2018).

#### 1.2.7 2019 Groundwater Monitoring

Based on the results of the 2018 groundwater monitoring, DEQ determined that additional monitoring and evaluation of natural attenuation was required. Pioneer completed two sampling events during 2019. One monitoring event occurred in April 2019 and one event occurred during November 2019. The results of these monitoring events were presented in a summary report dated January 22, 2020. Results for the 2019 groundwater monitoring continued to demonstrate that wells MW13-06, MW13-07, and MW13-08 all contained VPH constituents above the respective RBSLs (Pioneer, 2020).

# 2 OBJECTIVES OF CLEANUP WORK PLAN

The primary objective of this work plan is to safely and cost effectively address the remaining residual petroleum impacts located within the saturated zone of the former UST basin through the subsurface application of the remediation fluid PetroFix.

# **3** CLEANUP METHOD CHOSEN

Both excavation and landfill disposal and application of a subsurface remediation fluid were evaluated. The excavation and landfill disposal of petroleum-impacted soil was considered the least feasible, least safe, and least cost-effective method of addressing petroleum source areas at the site. This conclusion was based on several reasons, but the most significant include the lack of shallow, unsaturated, petroleum-impacted soil, and the presence of shallow groundwater conditions, which make excavation efforts difficult to impossible. The former UST basin (source area) was previously over-excavated in 1998, and this area of the site has been redeveloped with concrete asphalt, a canopy, and dispenser islands.

Relative to the excavation and landfill disposal method, the subsurface application of the remediation fluid PetroFix will be less intrusive and disruptive to the current ongoing business operations, safer, and more cost-effective. The injection program will be followed by 1 year of semi-annual groundwater monitoring to monitor the attenuation of the dissolved-phase plume.

# 4 CLEANUP WORK PLAN TASKS

In summary, the scope for this work plan includes applying remediation fluid, conducting two semiannual groundwater monitoring events following the remediation fluid application, preparing a groundwater monitoring report upon completion of the remediation fluid injection and first groundwater sampling event, and performing a Petroleum Vapor Intrusion (PVI) evaluation followed by a cleanup report appended with a RCP after the second groundwater monitoring event. Specifically, this work plan proposes the following actions to achieve these goals:



- Applying the remediation fluid PetroFix through injection as designed by the manufacturer, REGENESIS, Inc.
- Performing two semi-annual groundwater monitoring events.
- Validating all laboratory analytical data using DEQ's Data Validation Summary Form.
- Discussing 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.
- Updating the RCP and discussing the results with DEQ's project manager.
- Performing a PVI evaluation.
- Submitting a groundwater monitoring report that details the results of the first groundwater monitoring event.
- Submitting a cleanup report that details the results of the remedial injection, PVI study, and both groundwater sampling events.
- Work plan and reports will be submitted electronically following the Petroleum Tank Cleanup Section submittal requirements.

These cleanup activities will be provided to remediate and resolve Release #3189. As requested by DEQ, Pioneer proposes the following scope of work:

- Task 1 Project Management, Permitting, and Planning.
- Task 2 Remediation Fluid Application.
- Task 3 Semi-Annual Groundwater Monitoring.
- Task 4 PVI Evaluation.
- Task 5 Reporting.

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

### 4.1 Task 1 – Project Management and Planning

Task 1 Project Management and Planning work will include:

- Prepare a work plan and cost estimate.
- Develop bid requests for subcontractor solicitation.
- Subcontractor selection and oversight.
- Coordinate utility locates.
- Project scheduling.
- Prepare a Health and Safety Plan.
- Coordinate with subcontractors, owners, and regulators.
- Site work preparation.

Pioneer will notify 811 for utility locates prior to drilling activities. A private utility locate company will locate the private utilities owned and maintained by the facility. Pioneer field personnel will



document the locations of marked underground and aboveground utilities on the figures provided with the final report.

### 4.2 Task 2 – Remediation Fluid Application

Pioneer is proposing the application of PetroFix, a remediation treatment fluid, into the site's subsurface through injection points and potentially a select number of groundwater wells. PetroFix is an environmentally compatible formulation of micron-scale activated carbon combined with both slow and quick release inorganic electron receptors. PetroFix is designed to remediate petroleum hydrocarbons without requiring time consuming and expensive *ex situ* soil or groundwater treatment and disposal of the soil or groundwater from the excavation. We are proposing to apply 1,200 pounds of PetroFix at the site in a 25-point grid pattern. We propose to inject 162 gallons per point for a total volume of 4,040 gallons of injectate. The injection gallery location and layout are shown on the Site Map (Figure 2 in Attachment 1). The treatment area measures approximately 30 by 30 feet square, and the injection target zone will be from 5 to 10 feet bgs. Due to the clay-rich soil present at the site, the proposed injection point spacing is 6 feet on center.

### 4.3 Task 3 – Semi-Annual Groundwater Monitoring

This work plan proposes performing two semi-annual groundwater monitoring events. The first event will be conducted 6 months after the injections are complete. The second event will be conducted 6 months later. During each semi-annual event, Pioneer will collect groundwater samples from five of the eight existing site monitoring wells. For each event, we will gauge all eight wells and purge and collect groundwater samples from wells MW-1, MW-2, MW13-06, MW13-07, and MW13-08. We will attempt to complete the sample events in conjunction with the typically high and low groundwater conditions.

Prior to groundwater sample collection, we will gauge each of the 8 monitoring wells for the presence of 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 selected well does not contain LNAPL, the team will collect groundwater samples. 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 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 (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, 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.



We 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 five monitoring wells will be submitted for laboratory analysis of VPH and EPH. Based on the absence during the historical sampling at the site, the analysis of lead scavengers has been excluded.

Analysis of groundwater samples will be in accordance with DEQ's *Risk-Based Corrective Action* (*RBCA*) *Guidance for Petroleum Releases* (DEQ, 2018, DEQ, 2020, and DEQ, 2024). We 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. 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.

### 4.4 Task 4 – Perform Petroleum Vapor Intrusion Study

Pioneer personnel will complete a desktop evaluation of the potential for PVI in the vicinity of the on-site building and adjacent utility corridors using the previous soil data, historical data (cumulative soil analytical data), current and past groundwater monitoring analytical data, and sample location and depth data according to Section 2.4 of DEQ's Vapor Intrusion Guidance (DEQ, 2021a).

### 4.5 Task 5 – Reporting

Pioneer will prepare two separate reports for this work plan: one groundwater monitoring report, which will include the first groundwater sampling event, and one cleanup report, which will include the results of remedial fluid injections, the first and second groundwater sampling events, PVI evaluation, and an updated RCP.

#### 4.5.1 Groundwater Monitoring Report

Following the remedial injection and first round of groundwater monitoring, Pioneer will prepare and submit a groundwater monitoring report following the *Montana Groundwater Monitoring Work Plan and Report Guidance for Petroleum Releases* (DEQ, 2021b). The report will follow the Montana DEQ report format and include the following:

- Cover Letter with brief (one page or less) executive summary including a discussion of the groundwater monitoring event.
- Updated facility maps illustrating locations of area of remedial injection, 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 groundwater samples.
- Laboratory analytical reports for the groundwater samples.
- Field sample data sheets and related field data.
- Data validation documentation using DEQ Data Validation Summary Forms.

#### 4.5.2 Cleanup Report

Following the second round of groundwater sampling, Pioneer will report the results of the remedial injection, PVI, and both groundwater sampling events in a cleanup report. The report will include the following:

- Updated facility maps illustrating locations of remedial injection, 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 locations/depths of field data, laboratory analytical data for soil samples, and laboratory analytical data for new and previous groundwater samples.
- Laboratory analytical reports for groundwater samples.
- PVI evaluation.
- Logs, field data sheets, and related field data.
- Data validation.
- Data interpretation and recommendations relevant for further remediation and/or closure plan for the release.
- An appended RCP.

The report will be submitted within 45 days of receipt of the analytical data for the second groundwater monitoring event.

# **5** COST ESTIMATE

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

# **6** SCHEDULES

Pioneer proposes to perform and complete the remedial injection (Task 2) during the early spring of 2025, and first round of groundwater sampling (Task 3) 6 months after that which is expected to be during the summer of 2025. The groundwater monitoring report will be completed and submitted within 45 days of receipt of all laboratory analytical reports for the first groundwater monitoring event. The second groundwater sampling event will be completed 6 months following the first monitoring event. The cleanup report will be completed and submitted within 45 days of receipt of all laboratory analytical reports for the first groundwater monitoring event. The cleanup report will be completed and submitted within 45 days of receipt of all laboratory analytical reports. The full duration of the project is approximately 12 to 14 months, and the final report will be issued sometime in the spring of 2026.



## **7 REFERENCES**

- Northern Industrial Hygiene, Inc., 2013. Phase II Remedial Investigation Report. Conomart #4, 1240 South 27<sup>th</sup> Street, Billings, Montana 59101. Facility ID #56-00503, Release #3189, WP #6938. Prepared for Montana Department of Environmental Quality Petroleum Technical Section. May 22, 2013.
- Portage, Inc., 2016. Groundwater Monitoring and Evaluation of Cleanup Alternatives Summary Report. Conomart SuperStore #4, 1240 South 27<sup>th</sup> Street, Billings, Montana 59101. Facility ID #56-00503, Release #3189, WP #10169. Prepared for Montana Department of Environmental Quality Petroleum Technical Section. May 6, 2016.
- DEQ, 2018. Montana Risk-Based Corrective Action Guidance for Petroleum Releases. Montana Department of Environmental Quality. May 2018.
- DEQ, 2020. Risk-Based Corrective Action (RBCA) Risk-Based Screening Level (RBSL) Changes Memorandum dated 7/15/2020 from Kathryn Morris. Available at Montana Department of Environmental Quality website: <u>https://deq.mt.gov/Portals/112/Land/LUST/</u> <u>Documents/TechGuidDocs/RBCA%202020%20Interim%20Update\_Naphthalene\_Memorand</u> <u>um.pdf</u>.
- DEQ, 2021a. Montana Vapor Intrusion Guide. Montana Department of Environmental Quality. September 2021. Available at <u>MontanaVI Guide FINAL.pdf (mt.gov)</u>.
- DEQ, 2021b. 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. February 2024.
- Pioneer, 2018. Standardized Groundwater Monitoring Summary Report. Conomart SuperStore #4, 1240 South 27<sup>th</sup> Street, Billings, Montana 59101. Facility ID #56-00503, Release #3189.
  Prepared for Montana Department of Environmental Quality Petroleum Technical Section. December 12, 2018.
- Pioneer, 2020. 2019 Standardized Groundwater Monitoring Report, Conomart SuperStore #4, 1240 South 27<sup>th</sup> Street, Billings, Montana 59101. Facility ID #56-00503, Release #3189. Prepared for Montana Department of Environmental Quality Petroleum Technical Section. January 22, 2020.

# Attachment 1 Figures

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







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