Olympus Technical Services, Inc.

July 31, 2026

Donnie McCurry
Department of Environmental Quality
PO Box 200901
Helena, MT 59620-0901

Re: Groundwater Monitoring Work Plan
Keith's Country Store, 1621 10th Avenue South, Great Falls, Cascade County, Montana
Facility ID 07-01418, TID 18394, Release 3212, WPID 35208

Dear Mr. McCurry,

This letter presents a groundwater monitoring work plan for Keith's Country Store (Site) located at 1621 10th Avenue South in Great Falls, Montana as shown on Figure 1. Olympus Technical Services, Inc. (Olympus) has prepared this work plan in response to a Department of Environmental Quality (DEQ) letter issued June 25, 2026, requesting groundwater monitoring at the Site to confirm groundwater conditions before restarting the hydrogen peroxide system, which was shut down in 2022. A Site Map is provided as Figure 2. This work plan presents a detailed scope of work and a groundwater monitoring unit cost worksheet for the proposed scope of work.

Scope of Work

Groundwater Monitoring

The proposed scope of work includes groundwater sampling during seasonal low and high groundwater conditions (anticipated November/December 2026 and May/June 2027). Static water levels (SWLs) will be measured at eight Site wells (MW-3, MW-4, MW-5, MW-9, MW-10, MW-15, MW-16, and SDW-4) using an electronic water level probe during each event. The results will be used to develop a groundwater potentiometric map of the Site.

Groundwater sampling will be conducted at four wells (MW-4, MW-10, MW-15, and MW-16) in accordance with Olympus' standard operating procedures for low flow sampling. Groundwater will be purged from wells using a peristaltic pump operating in general accordance with DEQ Groundwater Sampling Guidance. Groundwater field parameters of dissolved oxygen (DO), specific conductivity (SC), temperature, pH, oxidation reduction potential (ORP) and turbidity will be measured during purging, and measurements will be recorded on groundwater sample information forms, which will be included in a summary report. Upon parameter stabilization, groundwater samples will be collected into laboratory-supplied containers, preserved, stored on ice, and submitted under chain-of-custody procedure to Energy Laboratories (Energy) in Helena, Montana, for analysis of volatile petroleum hydrocarbon (VPH), lead scavenger 1,2-dichloroethane (DCA), and intrinsic biodegradation indicators (IBIs) of sulfate, nitrate, nitrate+nitrite, methane, and dissolved ferrous iron.

Quality assurance/quality control (QA/QC) procedures will be followed for the provision of reliable, accurate, and defensible data. QA/QC samples will be collected into laboratory supplied containers, stored on ice, and submitted to Energy under chain-of-custody procedure. One duplicate groundwater sample will be collected during each event to test for precision related to sampling methods. The QA/QC samples will be analyzed for VPH.

Release Closure Plan

A Release Closure Plan (RCP) was developed for the Site in 2021, which includes discussion and results of investigative, post-investigative, and corrective action work to date. The RCP will be updated to reflect current Site conditions following the groundwater monitoring. The Site summary, remedial investigation results, conceptual Site model and evaluation of exposure pathways, evaluation of cleanup alternatives and costs for compliance monitoring will be re-evaluated and updated as appropriate. An RCP will not be submitted if Site closure is recommended.

Groundwater Monitoring Report

Olympus will present the results for the 2026-2027 groundwater monitoring event in one Groundwater Monitoring Report. The summary report will include a discussion of groundwater monitoring results, site maps, tabulated analytical data, groundwater sample information forms, analytical laboratory reports, data validation summary, time trend graphs, and conclusions and recommendations based on the monitoring results.

Cost Estimate

Work Plan development, mobilization, groundwater monitoring and sample collection, and reporting tasks will be invoiced at unit cost rates approved by the Petroleum Tank Release Compensation Board (PTRCB). A unit cost worksheet for groundwater monitoring is attached to this work plan. Project management will be invoiced on a time and materials basis.

Schedule

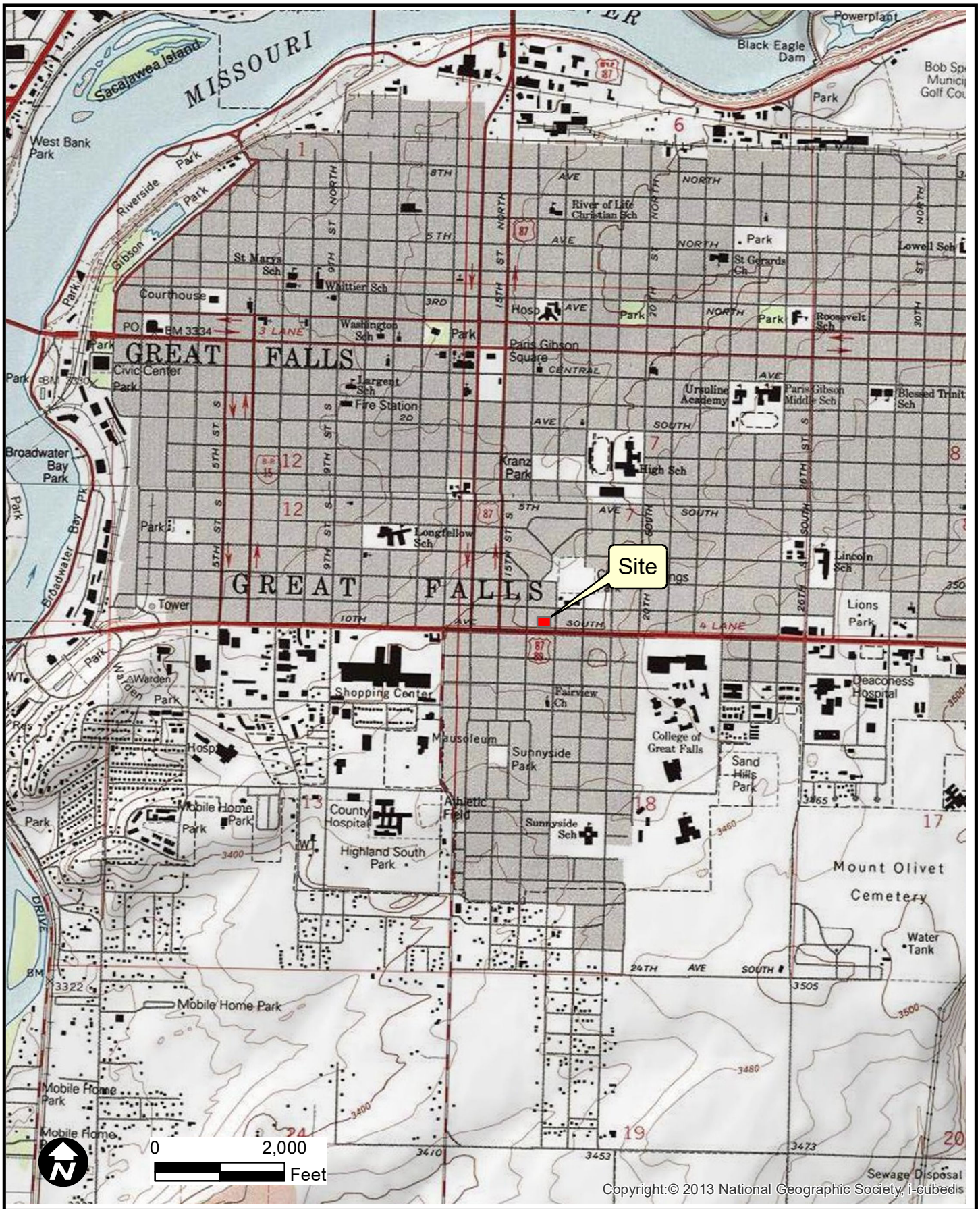
Olympus appreciates the opportunity to assist you with this project. Site work will commence upon approval of the work plan by DEQ. The first groundwater monitoring event is tentatively scheduled for the fourth quarter of 2026 pending workplan approval and PTRCB obligation. Please call me at 406-443-3087 with comments or questions regarding the proposed scope of work or the project.

Sincerely,
Olympus Technical Services, Inc.

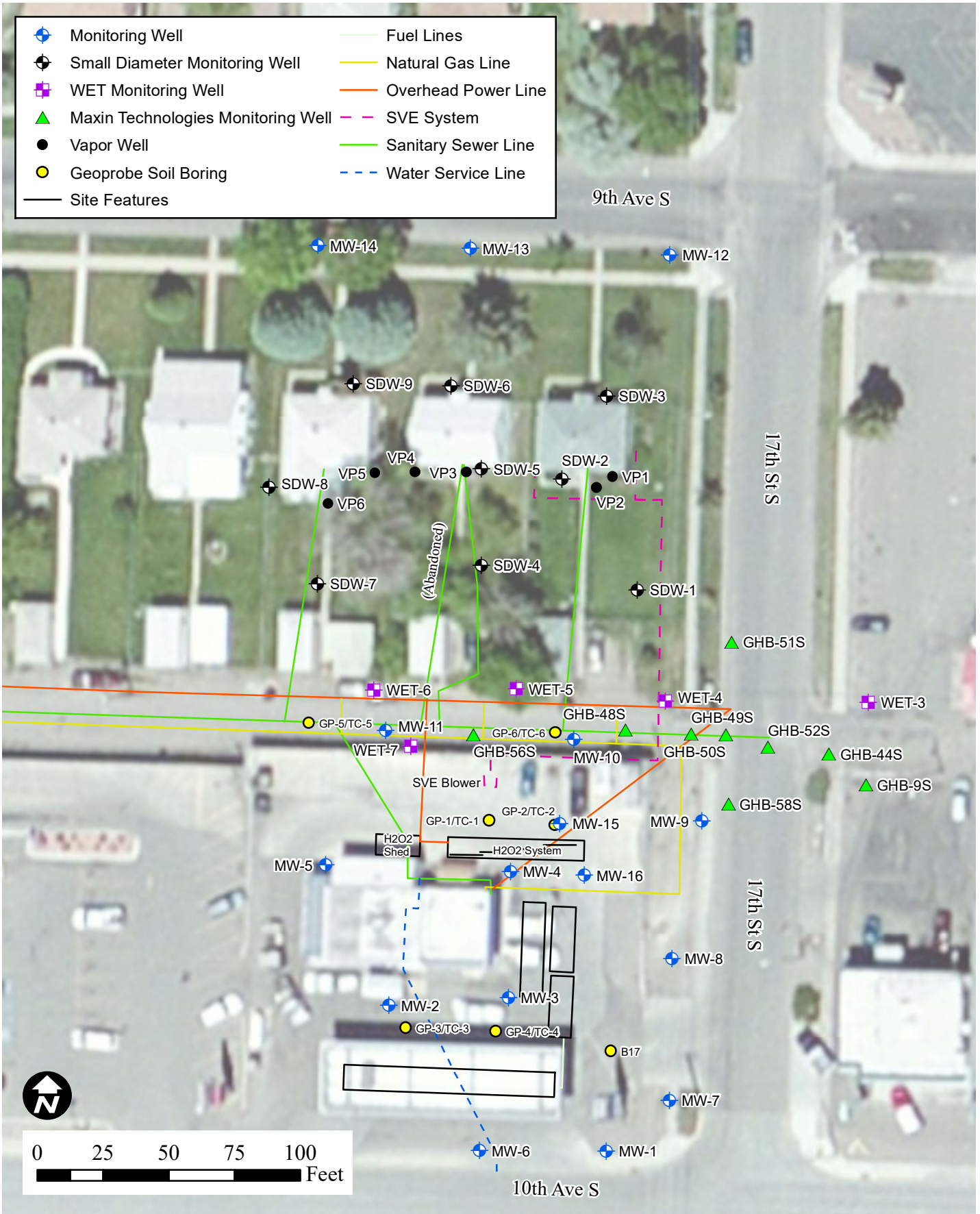
Diane Tackett

Diane Tackett, PG
Project Geologist

Attachments: Figures 1 & 2
Groundwater Monitoring Unit Cost Work Sheet



Olympus Technical Services, Inc.	SITE LOCATION MAP	FIGURE 1



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Site Features and Monitoring Well Locations

FIGURE 2

Source: Esri, Maxar, Earthstar Geographics, IGN, and the GIS User Community