



Olympus Technical Services, Inc.

September 28, 2026

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

Re: Work Plan Requested to Cleanup Petroleum-Contaminated Media at the Town Pump
Lewistown, 520 Northeast Main Street, Lewistown, Fergus County, Montana;
Facility ID 14-08711 (TID 20301), Petroleum Release 5278, Work Plan 35221
Olympus Work Order No. A4766

Dear Mr. Bergum:

Olympus Technical Services, Inc. (Olympus), on behalf of Town Pump, Inc., is submitting this Cleanup Work Plan (WP) for the above-referenced Facility (Site). The Montana Department of Environmental Quality (DEQ) Petroleum Cleanup Section requested an additional WP in correspondence dated August 5, 2026. The purpose of the work is to perform cleanup activities followed by groundwater monitoring to evaluate the effectiveness of the cleanup. This will be achieved by performing targeted injections around MW-4 to address the remaining petroleum-contaminated soil and groundwater, conduct follow-up groundwater monitoring, reporting, and the proposal of any additional work needed to resolve the release.

Site Description

This Facility is an active gas station and convenience store located in a combined commercial and residential area in Lewistown, Montana, shown on Figures 1 (Topographic Map) and 2 (Aerial Photograph). The property occupies approximately 3 acres and is located within the southwest-southeast quarter of Section 11, Township 15 North, Range 18 East, Fergus County, and is approximately located at latitude 47.07045° and longitude -109.41230°. The Site is bounded by NE Main Street (US Highway 87) to the south, Prospect Avenue to the west, Sereday Street to the north, and Jeide Street to the east. Residential properties are located to the north and east, commercial properties to the south and east, and a community park to the west.

Previous Site Investigations

The Site has operated as a gasoline and diesel fueling station with underground storage tanks (USTs), fuel dispensers, and a convenience store since at least 1985. Petroleum-impacted soil was discovered during fueling-system renovations in May 2018. Subsequent emergency response activities confirmed a petroleum release associated with the former UST system. In June 2018, approximately 748.87 tons of impacted soil were removed from the tank basin. Confirmation sampling identified residual benzene concentrations exceeding leaching Risk-Based Screening Levels (RBSLs) along the western sidewall and excavation base, with one base sample also exceeding the leaching RBSL for C9-C10 aromatics.

In 2020, Olympus advanced five soil borings and installed four groundwater monitoring wells to depths of approximately 15 to 20 feet below ground surface (bgs). Four groundwater-monitoring events were completed during 2020. Human-Health Standard (HHS) and RBSL exceedances

were limited to MW-4 and included benzene, C5-C8 aliphatics, C9-C12 aliphatics, C9-C10 aromatics, ethylbenzene, and naphthalene during one or more events. Although EPH Screen concentrations exceeded 1,000 micrograms per liter during each event, subsequent fractionation identified no individual EPH compounds above applicable RBSLs.

Five additional soil borings were advanced in February 2022, including completion of monitoring wells MW-9 through MW-11, to further delineate impacts downgradient of MW-4. Limited soil exceedances were identified near MW-10, primarily for VPH compounds. The investigation indicated that residual VPH-impacted soil was generally confined to the southern fueling-island area near MW-4, MW-5, and MW-10 at depths of approximately 9 to 17 feet bgs. Groundwater was encountered between approximately 9 and 13 feet bgs and generally flowed west-northwest. Groundwater monitoring conducted during 2022 and 2023 continued to identify VPH exceedances only at MW-4, with relatively stable concentrations and no EPH exceedances.

Additional remedial investigation activities conducted in June 2024 identified a benzene leaching RBSL exceedance in soil boring SB-6 and an EPH screening-level exceedance in SB-7; however, no individual EPH fractions exceeded their applicable RBSLs. Groundwater monitoring conducted between July 2024 and December 2025 identified no VPH or EPH Screen exceedances in MW-3, MW-9, MW-10, MW-11, MW-12, or MW-13. During the December 2025 event, groundwater collected from MW-4 exceeded applicable standards for benzene, C9-C10 aromatics, C5-C8 aliphatics, and C9-C12 aliphatics. No EPH fractions exceeded applicable RBSLs in any well sampled during 2024 or 2025.

Collectively, the investigation results indicate that residual petroleum impacts in soil and groundwater are localized near MW-4 and that the dissolved-phase plume is stable and limited in extent. Intrinsic biodegradation indicators, including depressed dissolved oxygen, reduced nitrate and sulfate, elevated dissolved iron, and methane detections—indicate that anaerobic biodegradation is occurring within the source area. However, persistent VPH exceedances at MW-4 indicate that natural attenuation alone has not rapidly reduced concentrations within the plume core. Olympus therefore recommended targeted remedial injections near MW-4, followed by two semiannual groundwater-monitoring events to evaluate treatment effectiveness and determine whether the Site may transition to monitored natural attenuation and eventual closure evaluation.

Scope of Work

The scope of work consists of the following primary tasks:

Task 1 – Work Plan

This WP fulfills DEQ's request for a Cleanup Work Plan.

Task 2 – Project Management

Project management will include coordination with DEQ, Town Pump, and Petroleum Tank Release Compensation Board (PTRCB) personnel, preparation of the Site Health and Safety Plan, project planning, utility locate notifications, scheduling, coordination with supplies/contractors, oversight of project details, equipment, and personnel, setup of project files, reviewing historical reports, maps, and data for the facility, and 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 one Staff Scientist to provide oversight during the injection event, a Technician II and Technician III (Senior) for performing the injection event, and two trips for a Technician III to complete the two semi-annual groundwater sampling events. The drill rig and associated materials and equipment will be mobilized to the Site by Olympus personnel.

Task 4 – Fieldwork

Task 4 in the cost estimate presents the cost for Staff Scientist oversight of field activities, including private utility locates and the injection event; a Site Map showing the proposed injection area is provided as **Figure 3**.

Task 5 – Lodging / Per Diem

It is estimated that the injection event will take approximately five days including mobilization to complete. It is estimated that it will take three days to complete each groundwater monitoring event (2 events). Task 5 includes per diem for three people for five days each and lodging for four nights each for the injections and six days of per diem and four nights of lodging for the groundwater monitoring events.

Task 6 – Survey (Private Locate)

Prior to injection activities, on-site utilities will be located and marked. Montana One Call will be notified a minimum of 72 hours before beginning drilling. A private utility locator will be subcontracted to locate private utilities. Utility location markings will be maintained throughout the project. Task 6 in the attached cost estimate details costs for private utility locates.

Task 7 – Targeted Injections

Petrofix will be injected within a 625-square foot (SF) area around MW-4 to remediate BTEX and TPH concentrations. A total of 1,600 lbs of Petrofix will be mixed with 4,503 gallons of water and evenly injected from 10 to 20 ft bgs into 17 points spaced 6 feet on center. Olympus' GeoProbe® direct push drill rig will be utilized to perform the injections. Each injection point will be abandoned by backfilling it with bentonite pellets from the base of the boring and the ground surface will be returned to match existing conditions. We anticipate 5 days will be required to complete the injection event. Task 7 in the cost estimate details costs to complete the injections event.

Task 8 – PetroFix

Task 8 present costs for Regenesys Petrofix product and shipping. Note, shipping costs are estimated and the direct costs will be invoiced. Product will be shipped to our Billings, MT location.



Task 9 – Monitoring (Groundwater)

Groundwater monitoring will be conducted semi-annually for one year. Groundwater monitoring wells MW-3, MW-4, MW-5, MW-9, MW-10, MW-11, MW-12, and MW-13 will be sampled. Monitoring will include:

- Measurement of groundwater static water levels (SWLs) in all Site monitoring wells during each groundwater monitoring event using an electronic water level probe.
- Collection of groundwater samples, including a field duplicate, 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.
- All groundwater samples will be submitted for laboratory analysis of VPH, EPH screen, and IBIs (last event only). The cost estimate assumes up to 50% of samples may require further fractionation of EPH compounds.

Task 9 in the cost estimate includes the costs for project setup, mobilization, and well sampling on a unit cost basis. It is anticipated that the wells will not be completed in a low-yield aquifer. A groundwater monitoring worksheet is attached to this work plan.

Task 10 – Laboratory Analysis w/ Fee (Groundwater Monitoring)

Task 10 in the cost estimate presents the laboratory analytical costs for the two groundwater monitoring events. Groundwater samples will be analyzed for VPH and EPH screen. The cost estimate assumes up to 50% of collected samples may require further fractionation of EPH compounds. IBIs will be analyzed only during the last event. 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 11 – Reporting

This task includes data validation, one Interim Data Submittal (IDS), updating the release closure plan (RCP), and preparation of a Cleanup and Groundwater Monitoring Report following the injection and groundwater monitoring events. The IDS will be compiled after the first groundwater monitoring event. The IDS will include a cover letter, figures, tables, groundwater sampling forms, data validation summary forms and review, and laboratory analytical reports. The IDS will be utilized to evaluate if an additional upgradient injection event is needed at the Site. The RCP will be updated following the second groundwater monitoring event and submitted with the Cleanup and Groundwater Monitoring Report. Task 11 of the cost estimate includes unit cost prices for completing these reports.

Cost

The cost to complete the scope of work outlined above is estimated at \$74,260.43, detailed on the attached cost schedule. The cost estimate is based on the following assumptions:

- Existing Facility wells do not require replacement or repair;
- Olympus' direct-push drill rig will be used to perform targeted injections around MW-4, and unit costs are provided in the attached cost estimate;
- Bi-annual groundwater sampling will be conducted for one year.

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

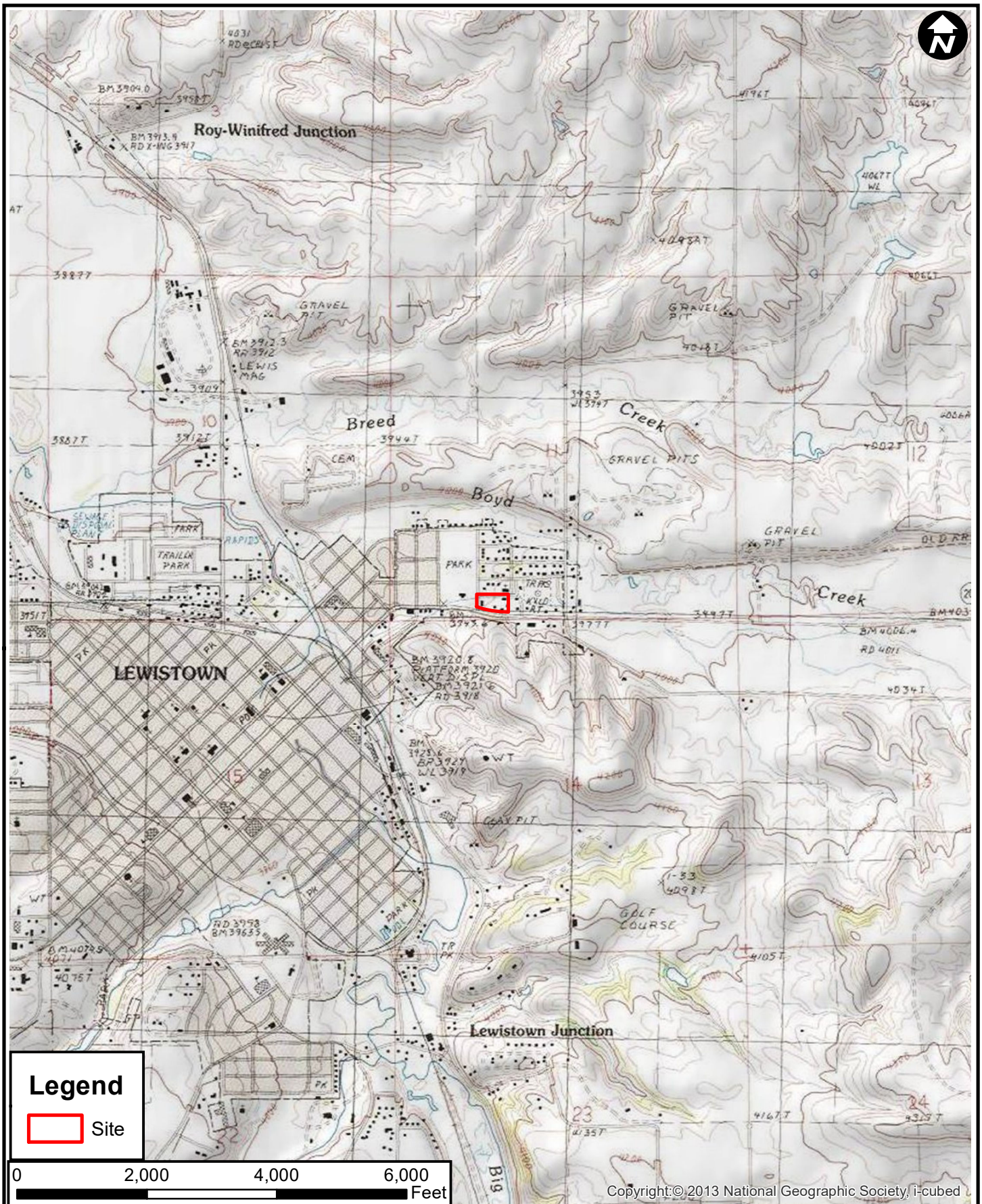
Sincerely,



Ethan J. Perro, P.G.
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
Subcontractor Estimates

cc: Paul Townsend, Town Pump, P.O. Box 6000, Butte, MT 59702



Olympus Technical Services, Inc.

Topographic Map

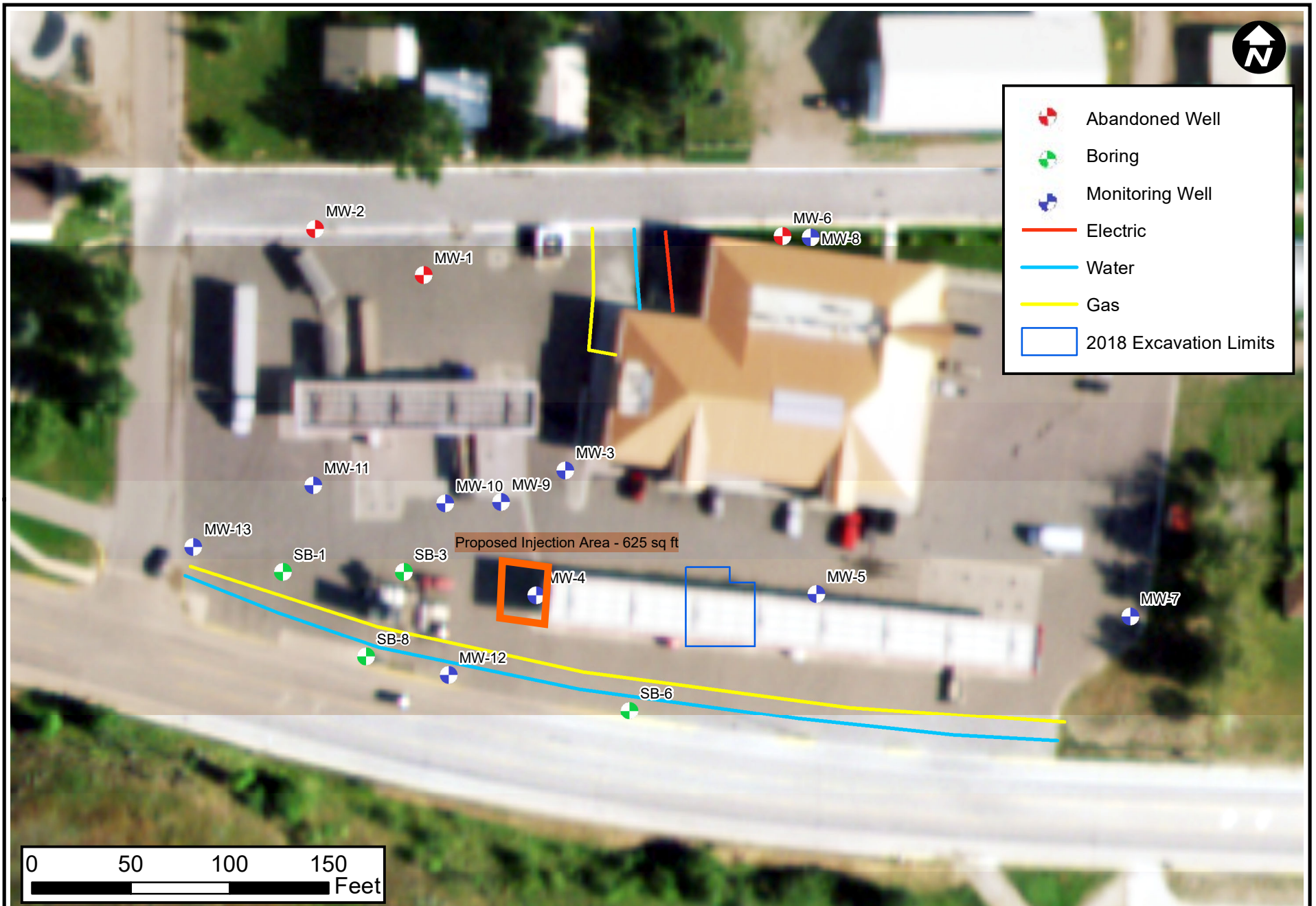
FIGURE
1



Olympus Technical Services, Inc.

Aerial Photograph

**FIGURE
2**



Olympus Technical Services, Inc.

Site Map

FIGURE
3