

March 21, 2025

Eric Krueger
Department of Environmental Quality
PO Box 200901
Helena, MT 59620-0901

Re: Groundwater Monitoring Work Plan
Pintler Station, 318 MT Highway 43, Wisdom, Beaverhead County, Montana
Facility ID 01-02173, TID 17490, Release 5349, WPID 34995

Dear Mr. Krueger,

This letter presents a groundwater monitoring work plan for the Pintler Station Fuel Facility (Site) in Wisdom, Montana. This work plan is submitted by Olympus Technical Services, Inc. (Olympus), on behalf of Chancy and Sheila Campbell, in response to a request by the Montana Department of Environmental Quality (DEQ) dated January 17, 2025. The Site is an active gasoline service station, convenience store, and automotive service business located at 318 Montana Highway 43 in Wisdom, Beaverhead County, Montana, as shown on Figure 1. This work plan presents a detailed scope of work and groundwater monitoring unit cost worksheet for the proposed scope of work.

Facility Information

Facility Location and Physical Features

The Site property is located in Section 33, Township 02 South, Range 15 West in Beaverhead County, Montana. The coordinates to the approximate Site location are 45.617490 degrees latitude, -113.449451 degrees longitude. A Site Map is provided as Figure 2. The Site is bounded by MT Highway 43 to the north with commercial businesses beyond, Old Highway and commercial businesses to the east, residences to the southeast, a Masonic Temple to the south, and a Post Office and commercial properties to the west.

Facility Ownership and Operational History

The Site has been operated as a fuel storage and service station with a convenience store and automotive services since 1984. The Site was developed in the early 1940s, but the use prior to 1984 was not documented in the Phase I Environmental Site Assessment conducted in 2019 by Rocky Mountain Environmental Associates, Inc. (RMEA). The facility was previously known as Big Hole Petroleum until March 2018, when the name was changed to Pintler Station. The current owner/operators are Chancy and Sheila Campbell of Wisdom, Montana. The property is currently operated as a gasoline service station with a convenience store and automotive service station. The petroleum tank system at the Site consists of one 1,000-gallon premium gasoline underground storage tank (UST), one 2,000-gallon unleaded gasoline UST, one 2,000-gallon diesel aboveground storage tank (AST), and one 180-gallon used oil AST. The UST basin is located directly east of the building with underground piping extending northwest to the fuel dispenser island. The USTs were installed at the Site in 1985, according to the DEQ UST database. The diesel AST is located west of the building and is connected to a dispenser pump to the northwest. The used oil AST is mounted on a trailer and is typically parked at the southwest corner of the building. The used oil is collected by Beaverhead County and used as fuel in the county shop, according to the current owner.

Two off-road (red-dyed) diesel ASTs of unknown capacity are located southwest of the facility building and are operated by a lease tenant.

Previous Investigations

A Phase I Environmental Site Assessment (ESA) was conducted in May 2019 by Rocky Mountain Environmental Associates, Inc. (RMEA). The Phase I identified a number of potential petroleum sources in the vicinity of the Site.

Release 5349 (Release) was confirmed in June 2019 during soil boring activities for a Limited Phase II ESA performed by RMEA. Nine soil borings (B1 through B9) were advanced to a depth of 15 feet bgs by a direct-push drill rig on June 18, 2019. Visual observations and field headspace screening indicated petroleum impacts at the Site in six of the nine soil borings, ranging in depth from 1.5 feet to 12 feet below ground surface (bgs). Soil samples from borings B1, B2, B3, B6, B7, and B9 were analyzed for volatile petroleum hydrocarbons (VPH), extractable petroleum hydrocarbons, polycyclic aromatic hydrocarbons (PAHs), and lead scavengers consisting of 1,2-dichloroethane (DCA) and 1,2-dibromoethane (EDB). One surface soil sample collected near the hydraulic lift in the automotive service garage (boring B1) was analyzed for polychlorinated biphenyls (PCBs).

The Release was confirmed by analytical results on July 9, 2019. The soil sample from boring B2 at 2.5-4 feet bgs exceeded the Leaching to Groundwater Risk-Based Screening Levels (RBSLs) for C11-C22 aromatics. Select VPH and EPH analytes exceeded the Release Confirmation RBSLs in the soil samples collected from Boring B2 and B7, but were below applicable leaching to groundwater and direct contact RBSLs for the Site. All other VPH, EPH, PAH, lead scavenger, and PCB constituents were not detected in soil samples at concentrations exceeding the applicable RBSLs and EPA Regional Screening Levels (RSLs).

Groundwater was encountered in the soil borings at a depth of approximately 12- to 13-feet bgs. Reconnaissance groundwater samples were collected from soil borings B3 and B6 and submitted for VPH, EPH, and lead scavenger analysis as samples GW-3 and GW-6, respectively. Benzene, toluene, C9-C10 aromatics, and C5-C8 aliphatics were detected at concentrations above the Human Health Standards (HHS) or RBSL in the groundwater sample collected from boring B6. No other VPH or EPH analytes exceeded the HHS/RBSLs in sample GW-6. Sample GW-3 did not contain VPH or EPH analytes at concentrations exceeding the HHS/RBSL. PAHs were not detected at concentrations above the HHS/RBSLs in either groundwater sample. Lead Scavengers were not detected at concentrations above the laboratory reporting limit in groundwater samples at the Site.

The Release was reported to DEQ on July 9, 2019, on receipt of the laboratory report. A 24 Hour Initial Release Response Report was submitted to DEQ on July 9, 2019, and a 30-Day Release report was submitted to DEQ on July 25, 2019. The Phase II ESA report was completed July 23, 2019, and recommended additional subsurface and groundwater investigation to characterize the extent and magnitude of petroleum impacts at the Site.

Olympus installed five monitoring wells in August 2023 to a depth of 20 feet bgs. No VPH or EPH analytes were detected in soil samples above the HHS/RBSLs. Groundwater monitoring was conducted in September 2023 and June 2024. Benzene was detected in the groundwater sample collected from monitoring well MW-3 in September 2023. All other VPH and EPH constituents were not detected above their respective HHS/RBSLs. All groundwater VPH and EPH analytes were not detected above laboratory reporting limits in June 2024.

A remedial investigation report was submitted in August

Additional groundwater monitoring was recommended under low groundwater conditions to verify the benzene exceedance in September 2023.

Scope of Work

Groundwater Monitoring

The proposed scope of work includes one groundwater sampling event during seasonal low groundwater conditions (anticipated September/October 2025). Groundwater monitoring will include the measurement of static water levels (SWLs) from all five Site wells (MW-1 through MW-5). A groundwater sample will be collected from one well (MW-3) for laboratory analysis, as well as one field duplicate. SWLs will be measured using an electronic water level probe to develop a groundwater potentiometric map of the Site. The analytical results will be submitted to DEQ within 14 days of receipt of the laboratory report for discussion about whether additional sampling is necessary at high groundwater. A groundwater monitoring report will be submitted to DEQ within 60 days of receipt of the laboratory report.

A groundwater sample will be collected from monitoring well MW-3 in accordance with Olympus' standard operating procedures (attached) for low flow sampling. Groundwater will be purged from the well using a peristaltic pump operating in general accordance with DEQ Groundwater Sampling Guidance. Groundwater parameters of dissolved oxygen (DO), specific conductivity (SC), temperature, pH, oxidation reduction potential (ORP) and turbidity will be measured during purging. Measurements will be recorded on groundwater sample information forms, which will be included in the monitoring report. Upon parameter stabilization, a groundwater sample will be collected into laboratory-supplied containers, preserved, stored on ice, and submitted by chain-of-custody procedure to Energy Laboratories (Energy) in Helena, Montana, for analysis of volatile petroleum hydrocarbon (VPH).

Quality assurance/quality control (QA/QC) procedures will be followed for the provision of reliable, accurate, and defensible data. A QA/QC sample 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 to test for precision related to sampling methods. The QA/QC sample will be analyzed for VPH.

Release Closure Plan

A Release Closure Plan (RCP) was developed for the Site in 2024, 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 2025 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, 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 at approved PTRCB rates for the year the work takes place.

Schedule

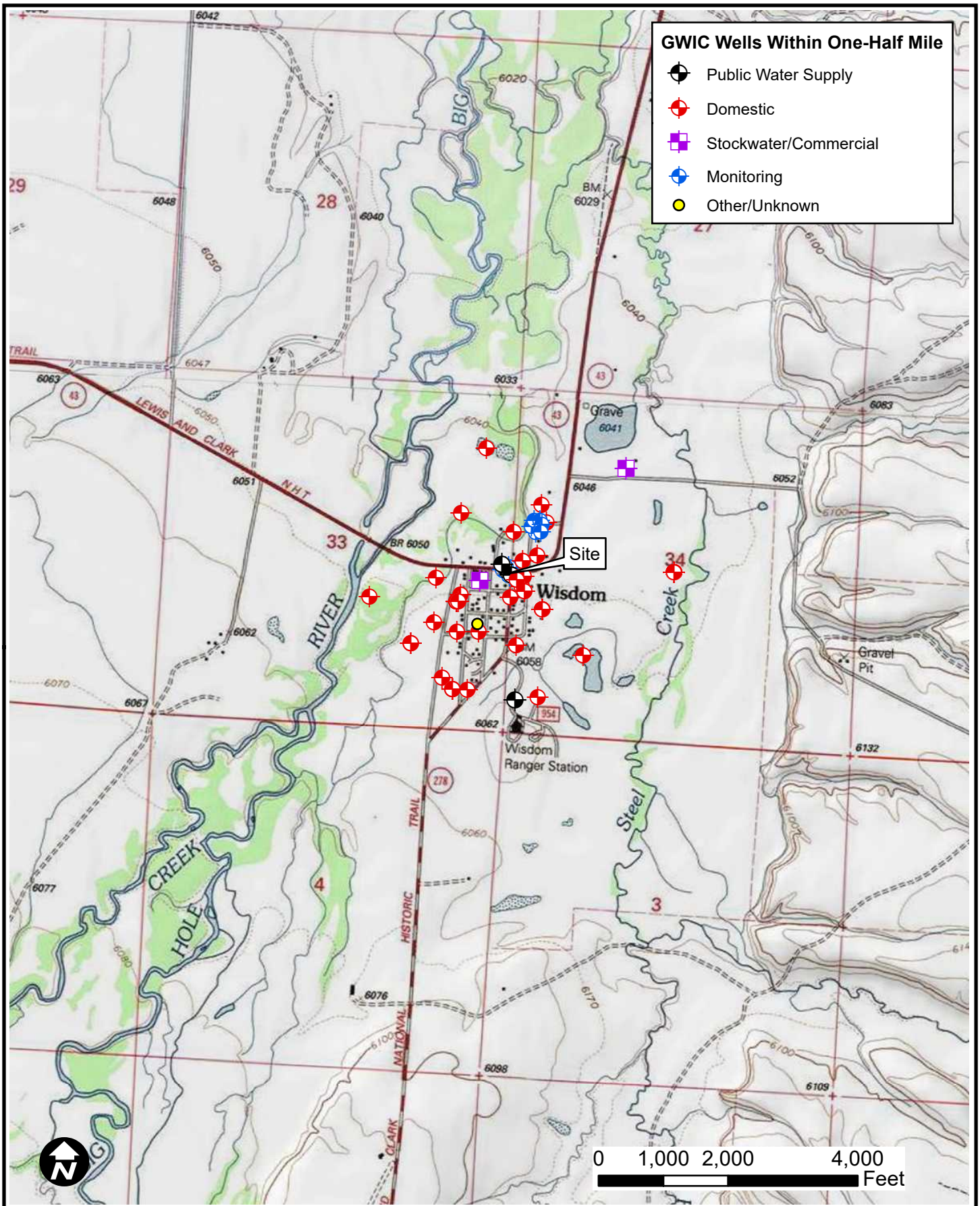
Olympus appreciates the opportunity to assist you with this project. Site work will commence upon approval of the work plan by DEQ. The first groundwater monitoring event is tentatively scheduled for the third quarter of 2025 pending work plan approval. Please call me at 406-443-3087 with comments or questions regarding the proposed scope of work or the project.

Sincerely,
Olympus Technical Services, Inc.



Diane Tackett, PG
Project Geologist

Attachments: Figures 1 & 2, Groundwater Monitoring Unit Cost Work Sheet, and Standard Operating Procedures



Olympus Technical Services, Inc.

Topographic Map
Pintler Station
Wisdom, Montana

Figure
1

