Water & Environmental TECHNOLOGIES

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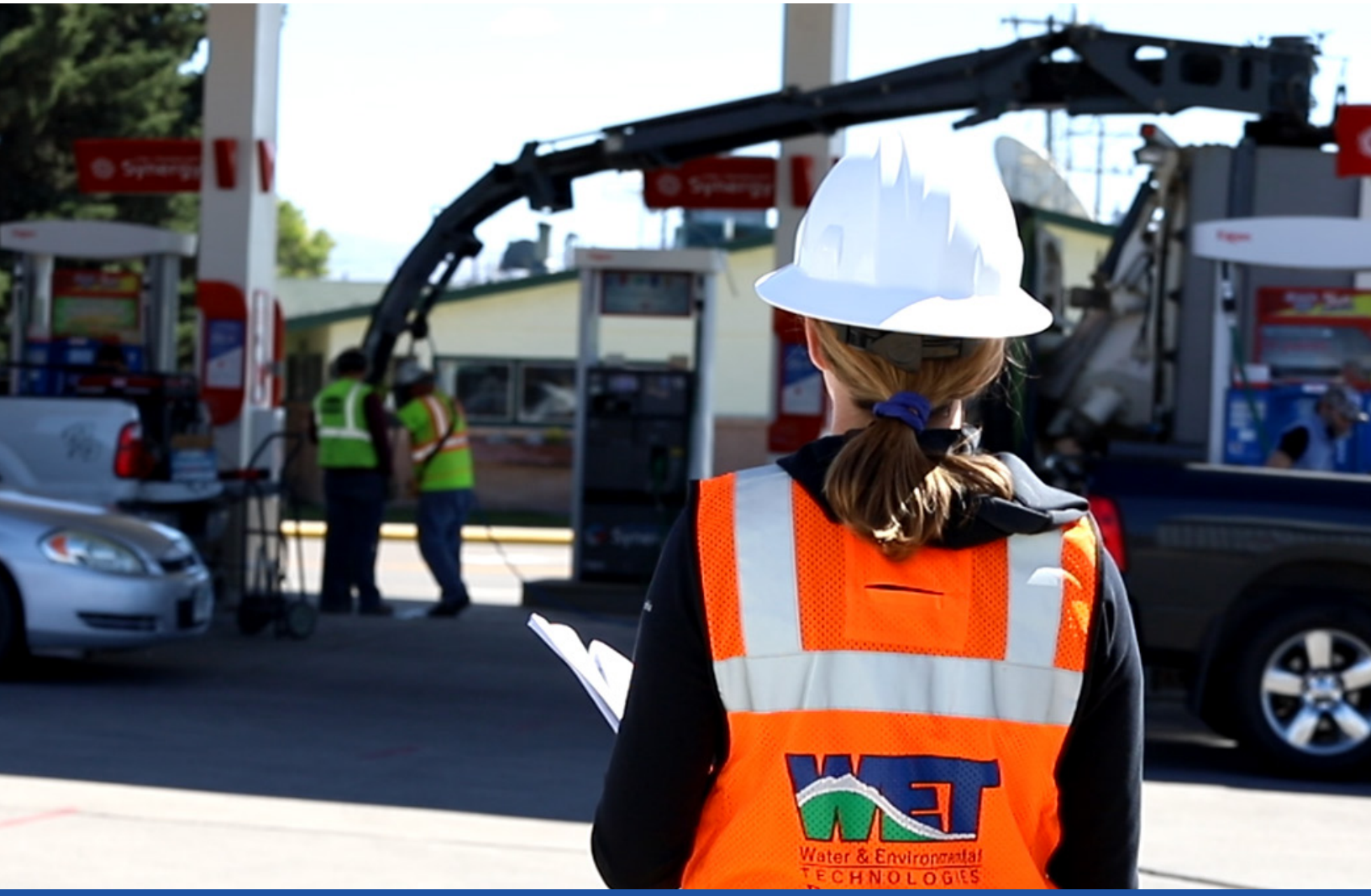


Town Pump #2-Dillon, Facility ID 01-08696, Release 5350, GWM WP 35149

Dillon, Montana

Prepared For:
Town Pump, Inc.
PO Box 6000 | Butte, MT 59701

March 4, 2026

Table of Contents

1 Executive Summary 1
2 Facility History and Release Background 1
2.1 Facility History 1
2.2 Release Background 2
3 Objectives of Groundwater Monitoring 2
4 Minimum Work Plan Tasks 3
4.1 Work Plan Preparation 3
4.2 Project Management 3
4.3 Mobilization 3
4.4 Groundwater Monitoring 3
4.5 Laboratory Analysis 4
4.6 Quality Assurance/Quality Control 4
4.7 Investigation Derived Waste (IDW) Management and Disposal 5
4.8 Reporting 5
5 Cost and Schedule 5
5.1 Cost 5
5.2 Schedule 5

List of Tables

Table 1. Stabilization Parameters 4
Table 2. Laboratory Analyses 4

List of Figures

Figure 1. Site Location - Aerial
Figure 2. Site Map

List of Appendices

Appendix A—WET Standard Operating Procedures (SOPs)
Appendix B—Cost Estimate

1 Executive Summary

Water and Environmental Technologies (WET) presents this Groundwater Monitoring Work Plan (WP) for the petroleum release 5350 (Release) at Town Pump #2-Dillon (Facility), as required in the Montana Department of Environmental Quality (DEQ) WP request letter dated February 10, 2026.

The scope of work includes:

- Mobilizing to and from the site
- Monitoring groundwater at Facility monitoring wells twice during high and low groundwater, which includes:
    - Gauging fluid levels at all facility monitoring wells.
    - Collecting groundwater samples at monitoring wells TP-1, TP-2, TP-3, TP-4, TP-5, TP-6, MW-1 by low-flow sampling methodology according to DEQ's Groundwater Sampling Guidance.
    - Analyzing groundwater samples for petroleum constituents as required by the DEQ Montana Risk-Based Corrective Action Guidance for Petroleum Releases during the initial groundwater monitoring event.
    - Disposing of purge water according to the DEQ Purge Water Disposal flow chart.
- Validating all laboratory analytical data using DEQ's Data Validation Summary Form (DVSF).
- Discussing ongoing WP tasks and results with DEQ's project manager (PM) and submitting written agreed-upon WP modifications as required to complete the WP objectives.
- Updating a Release Closure Plan (RCP) and discussing results with DEQ's PM.
- Preparing and submitting a Groundwater Report detailing the method and results of all groundwater monitoring events completed under this WP, which will include:
    - Discussion of the monitoring method results, deviations from the approved WP, recommendations, and conclusions.
    - Cumulative groundwater data tables.
    - Updated site features and potentiometric surface maps.
    - Appended groundwater monitoring field forms, laboratory analytical data, completed DVSFs, and the updated RCP.

2 Facility History and Release Background

2.1 Facility History

The Facility was formerly and is currently used as a gas station and convenience store dispensing both gasoline and diesel and is currently operated by Town Pump. The current release was discovered during the excavation of a southern portion of the site while replacing the canopy over the diesel island on July 23, 2019. During excavation, contracted personnel noted diesel odor and staining of the soil. WET personnel were contacted and mobilized to obtain samples for laboratory analysis. The cause, source, and amount of petroleum lost is unknown.

The Facility currently contains eight underground storage tanks (USTs) for storing diesel and gasoline. Figure 2 displays an as-built of the current and former dispenser-UST configuration. The

only change between the as-builts is the diesel island on the south end of the property was moved further east. USTs numbered 7-11 on the northwest portion of the property were installed on September 10, 1990, each with a 12,000-gallon capacity. Tank 12 was removed on March 30,1995; date of installation is unknown. Tank 13 is 6,000 gallons and was installed on May 1, 1999, in the southwestern portion of the site. On August 20, 2001, tanks 14 and 15 were installed stacked on the northwestern portion of the site with capacities of 10,000 and 5,000 gallons, respectively. Piping runs from tanks 7-11, 14, and 15 south along the western side of the building and property where the gasoline tank piping diverts east toward the gasoline dispensers. The diesel piping continues south to the diesel dispensers at the southern edge of the property.

The Facility is home to several historical releases (172, 569, 2551, 2626, 4082, and 5300). All previous releases have been resolved and require no further corrective action. Release 5350 is the only active release at the Facility.

2.2 Release Background

WET conducted a site remedial investigation (RI) following Work Plan 33994 written in response to a Montana Department of Environmental Quality (DEQ) Work Plan Request letter dated December 6, 2019. The scope of work, as defined by the WP, included the drilling and sampling of ten soil borings, installation of six monitoring wells, and conducting one round of groundwater sampling at Town Pump #2-Dillon (Facility) in Dillon, Montana. Additional work was completed as discussed between Town Pump, WET and DEQ project managers. This included focusing on the 0- to 7-foot below ground surface (ft bgs) interval at six different locations to assess shallow soil using the combination of a vac truck and drilling.

No groundwater samples exhibited concentrations that exceeded Risk Based Screening Levels (RBSL). Soil ranging from 0-15 feet below ground surface (bgs) throughout the site exceeded Tier 1 RBSLs for constituents such as Naphthalene, C9 to C10 Aromatics, C9 to C12 Aliphatics, and C11 to C22 Aromatics and required further evaluation using Tier 2 RBSLs. The site-specific leaching to groundwater RBSLs were calculated by determining a dilution attenuation factor (DAF). The DAF takes into consideration the site's aquifer hydraulic conductivity, hydraulic gradient, mixing zone depth, aquifer thickness, infiltration rate and source length parallel to ground water flow. Following evaluation using Tier 2 RBSLs, there were no exceedances of any applicable RBSLs in any soil samples. An RI was completed and submitted to DEQ. WET recommended two groundwater sampling events during high and low groundwater to further evaluate potential contamination in groundwater and move the release towards closure.

DEQ sent a WP request letter to Paul Townsend of Town Pump on February 10, 2026, requesting a WP for additional monitoring.

3 Objectives of Groundwater Monitoring

The objectives of groundwater monitoring are to evaluate the status of petroleum-contaminated media associated with the Release. These objectives will be achieved through two groundwater monitoring events, one during high and one during low groundwater, which involve fluid level

measurement and the collection of groundwater samples for laboratory analysis. Samples collected will be analyzed for:

- Volatile Petroleum Hydrocarbons (VPH)
- Extractable Petroleum Hydrocarbons (EPH).

4 Minimum Work Plan Tasks

4.1 Work Plan Preparation

WET personnel prepared this WP in response to the DEQ WPR letter dated February 10, 2026.

4.2 Project Management

WET personnel will provide Town Pump (Owner) and DEQ's project manager with any ongoing WP tasks and relevant results on an as-needed basis. Other duties associated with this task include scheduling field work, project reporting administration, monitoring the project budget and deliverables, and any submitted written agreed-upon WP modifications to complete the objectives.

4.3 Mobilization

Two total mobilizations for a Staff Engineer are required for this WP. Each round-trip mobilization is approximately 130 miles or two hours of travel time and includes one hour of loading/unloading time for each event.

4.4 Groundwater Monitoring

WET will conduct two groundwater monitoring events of seven monitoring wells: TP-1, TP-2, TP-3, TP-4, TP-5, TP-6, MW-1. These wells will be monitored twice in 2026 to coincide with seasonally high and low groundwater. Fluid levels will be measured with an oil-water interface meter prior to purging the well in accordance with WET standard operating procedure (SOP) SOP-5: Measurement of Fluid Levels and recorded on the WET Groundwater Sampling Form in accordance with WET SOP-1: Field Logbook and Field Sampling Forms. SOPs are included as **Appendix A**. Any monitoring well containing free product will not be sampled. Monitoring wells will be purged and sampled using a peristaltic pump and following procedures specified in this workplan and WET SOP-8B: Groundwater Sampling – Low Flow Method (**Appendix A**) and DEQ's Groundwater Sampling guidance (2018).

Field parameter measurements consist of monitoring depth to water, temperature, specific conductivity (SC), dissolved oxygen (DO), pH, oxidation reduction potential (ORP), turbidity, and approximate pumping rate. Temperature and drawdown will be monitored but are not subject to stabilization criteria. Groundwater field parameters for each well will be measured by YSI® Professional Plus Quatro Cable multi-meter, HACH turbidity meter, and an oil/water interface probe as outlined in WET SOP-6: Measurement of Field Parameters (**Appendix A**). Field parameter readings should be recorded every 3-5 minutes until three consecutive readings are within stabilization range. Once parameters stabilize according to the criteria in **Table 1**, a groundwater sample will be collected in laboratory-supplied bottles.

Table 1. Stabilization Parameters

Water Quality Parameter	Unit	Stabilization Range	Exception
pH	standard units (s.u.)	±0.1 s.u.	
Specific Conductance (SC)	microsiemens per centimeter (µS/cm)	±3%	
Dissolved Oxygen (DO)	milligrams per liter (mg/L)	±10%	<0.50 mg/L
Turbidity	nephelometric turbidity units (NTU)	±10%	<5 NTU
Oxidation/Reduction Potential (ORP)	millivolts (mV)	±10 mV	

Reusable equipment (oil-water interface probe) will be decontaminated in accordance with WET SOP-2: Equipment Decontamination (**Appendix A**).

4.5 Laboratory Analysis

Groundwater samples will be submitted to Energy Laboratories in Helena, Montana for the analyses and methods listed in **Table 2**. Groundwater samples will be submitted for laboratory analysis following procedures outlined in WET SOP-3: Sample Nomenclature, Documentation, and Chain of Custody (**Appendix A**) and WET SOP-4: Sample Package and Shipping (**Appendix A**).

Table 2. Laboratory Analyses

Container(s)	Preservation	Analysis	Method
Three (3) 40-mL VOA vials	HCl	VPH	MA-VPH
Two (2) 1-L amber glass	H_2SO_4	EPH	MA-EPH

4.6 Quality Assurance/Quality Control

Quality assurance/quality control (QA/QC) samples including duplicates and field blanks (water) will be collected at a minimum frequency of 1 per 20 natural samples (5%) as outlined in WET SOP-16: Quality Control Sampling. The duplicate will be collected at a random site by splitting a natural sample in the field. The field blank will be collected during representative sampling conditions at the Facility by pouring laboratory provided organic-free deionized water into laboratory provided sample containers. QA/QC samples will be analyzed for the same constituents as the natural samples.

Energy Laboratories will conduct all analyses of groundwater samples and provide a laboratory QC report for each analysis. WET personnel will validate all laboratory analytical data using

DEQ's Data Validation Summary Form (DVSF). This summary form will be included in the final report.

4.7 Investigation Derived Waste (IDW) Management and Disposal

Following the DEQ disposal of untreated purge water from monitoring guidance dated July 15, 2015, the purge water originates from the shallowest aquifer, is not likely to result in an exceedance of soil screening levels, is not discharged to a surface water, and is not from a mine audit or long-term pumping test. Therefore, the purge water from the groundwater sampling event will be discharged to pervious Facility ground. All non-reusable sampling equipment and spent personal protective equipment will be disposed of in garbage bags.

4.8 Reporting

Upon completion of the WP tasks, WET will prepare a Groundwater Monitoring Report in the DEQ guidance format detailing the results of groundwater monitoring, including the following:

- Discussion of the monitoring method results, deviations from the approved work plan, assessment of attenuation rates (on-site and off-site), recommendations, and conclusions.
- Cumulative groundwater data tables.
- Updated site features and potentiometric surface maps.
- Appended groundwater monitoring field forms, laboratory analytical data, completed data validation summaries, and an updated Release Closure Plan.

5 Cost and Schedule

5.1 Cost

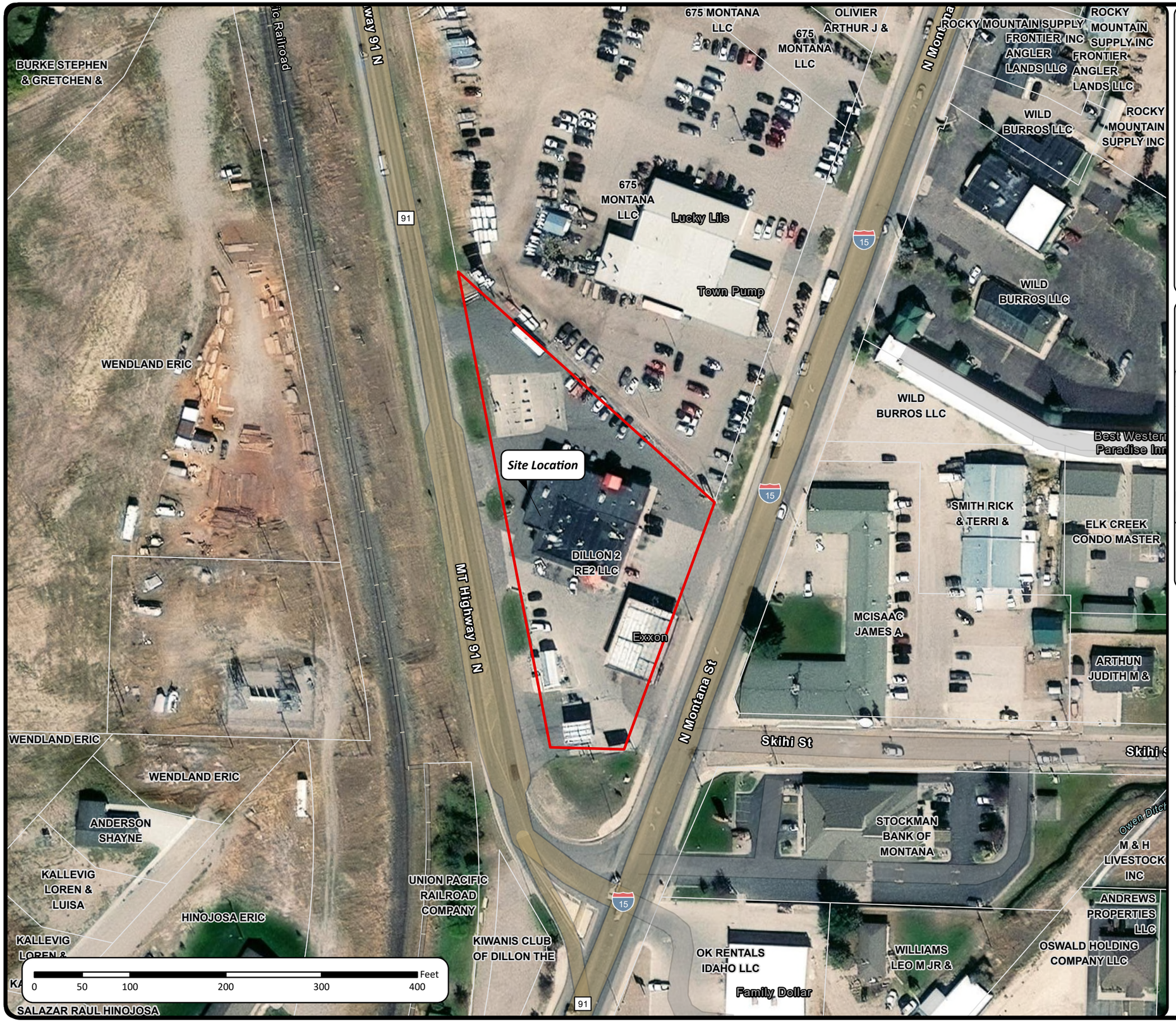
Work effort level has been estimated using best professional judgement and typical scenarios related to work of this type. A detailed cost estimate is included as **Appendix B**.

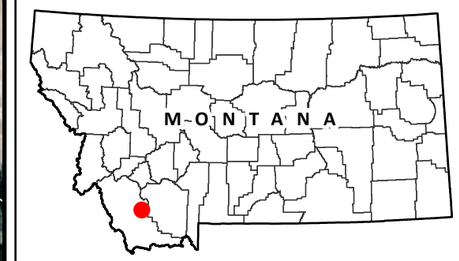
5.2 Schedule

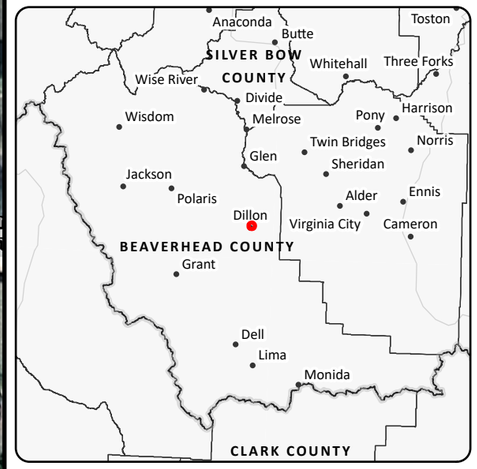
WET will begin implementation of the WP upon DEQ approval. High groundwater sampling will take place during the spring months of May or June 2026. Low groundwater sampling will take place during the fall months of September or October 2026. Reporting will be completed by January 15, 2027. Notification for each event will also be sent to the Facility Owner and the DEQ Project Manager prior to activities.

Figure 1

Site Location – Aerial







Site Location
Cadastral Boundary

N
W E
S

NO.	DESCRIPTION	DATE	DRAFT	REVIEW
1	MAP CREATION	7/25/22	KK	GM
2	UPDATE LAYOUT	1/15/26	LG	
3				
4				
5				

NOTES

SITE LOCATION

TOWN PUMP FACILITY - DILLON, MT

FIGURE 1

JOB#: TOWNPUMPM11

DATE:1/15/2026

Path: P:\PROJECTS\Town Pump\TownPumpM11\350-

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Figure 2

Site Map

Piping
Petroleum Release
Green indicates Open Release
Blue indicates Resolved Release
Petroleum Tanks
Former Diesel Dispenser
Gasoline Canopy
New Diesel Canopy
Site Location

N
W E
S

NO.	DESCRIPTION	DATE	DRAFT	REVIEW
1	MAP CREATION	8/10/22	KK	
2	UPDATE RELEASES	1/15/26	LG	GM
3				
4				
5				

NOTES

FACILITY MAP

TOWN PUMP FACILITY - DILLON, MT

FIGURE 2

JOB#: TOWNPUMPM111

DATE:1/27/2026

Path: P:\PROJECTS\Town Pump\TownPumpM11\350-Mapping\Maps\RI_Investigation_072022\RI_Investigation_072022_V2.aprx, Author: lgeorge

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Town Pump
MT Highway 91 N
N Montana St
Union Pacific Railroad
Skihi St
Exxon
11
10
9
8
7
14
15
13
Release 2551
Release 569
Release 4082
Release 172
Release 2626
Release 5300
Release 5350
91
15

0 37.5 75 150 225 300 Feet