

Section 1 RP and Site Information:

Date: June 11, 2026

RP Info: MDT Remediation & Assessment Section
PO Box 201001
Helena, MT 59620-1001
Attn: Aaron Anderson

Workplan for Groundwater Monitoring & Sampling

MDT Swan Lake Maintenance Facility
24526 Highway 83, Swan Lake, Lake County, Montana
Facility ID 24-08739 (TID 23068), Petroleum Release 6494, Work Plan 35197

MDT is presenting a work plan and cost estimate to conduct one additional groundwater monitoring event as recommended by the Petroleum Tank Release Compensation Board (PTRCB) in an email dated June 3, 2026.

Olympus Technical Services will be conducting groundwater monitoring and reporting for the Summer 2026 event.

Section 2 History:

There have been three historic petroleum storage and distribution systems at the facility. Most recently there were two ConVaults, which are above ground steel tanks enclosed within a concrete vault that serves as secondary containment. According to anecdotal information from MDT staff, the ConVaults were in operation from 2000 to 2010, which was the completion year of the new facility at Ferndale. There is an aerial photo that displays the ConVault location as recent as 2013, but it isn't known whether they still stored fuel at that point. They were eventually emptied and moved to another MDT facility.

Prior to the ConVaults, there were two 2,000-gallon underground storage tanks that were located on the United States Forest Service (USFS) leased property above the maintenance facility. The two fiberglass USTs were in use between 1992-2000 and Release 3988 was discovered upon their removal. A remedial investigation was conducted by Tetra Tech in April 2001 and found no evidence of petroleum contamination in groundwater in the location of the former USTs and downgradient areas. As a result of the Tetra Tech Investigation, release 3988 was closed.

Release 1395 was discovered in 1992 during removal of USTs that had been in operation since 1966. According to the 30-day leak report for release 1395, soil samples collected from underneath the USTs were below regulatory limits, and the release was subsequently closed. However, the release response narrative noted that an "extensive surface soil stain" was observed in the vicinity of the

pump house for the USTs, but a thorough remedial investigation was never conducted for release 1395.

On behalf of MDT, WCEC has conducted a Phase II Environmental Assessment to facilitate a property transfer. The assessment detected soil and groundwater contamination. Subsequent investigations have confirmed shallow subsurface soil impacts from 1 to 7 feet below ground surface (bgs) in the presumed former location of the UST system in operation from 1966 to 1992. Contamination spreads to the downgradient, but at greater depths of 7 to 12 feet bgs, suggesting that contamination had spread through groundwater transport.

IBI data analysis indicates that aerobic degradation processes are occurring, with relatively high background DO concentrations. However, DO is depleted along with other terminal electrons acceptors as the plume moves along the groundwater flow path.

MDT desires to mitigate the contamination through a combination of remedial excavation and oxygen injection. MDT has secured a one-time landfarm permit through DEQ to landfarm contaminated media at the northeast corner of MDT's Ferndale Maintenance Facility.

Section 3 Groundwater Monitoring Objectives:

The additional groundwater monitoring events will be conducted during summer 2026 to evaluate current groundwater conditions, since the last groundwater monitoring event hadn't been collected since 2023.

The additional data is important to determine whether excavation activities within WPID 716835076 may continue in late summer/early fall 2026. Excavation was to be conducted during low groundwater conditions, so the event may not preclude the excavation plans if concentrations do not indicate appreciable natural attenuation.

For the Summer 2026 event, groundwater samples will be collected from MW-2, MW-3, MW-4, MW5, MW-8, MW-9, MW-10 and MW-11. Only SWL measurements will be collected from MW-1, MW-6, and MW-7.

Groundwater monitoring will be conducted by an Olympus Technical Service Technician III approximately in Summer 2026. Eight on-Site wells will be sampled. Monitoring will include:

- Measurement of the groundwater static water level (SWLs) in the 11 wells with an electronic water probe;
- Collection of ground water samples, including a field duplicate, using low-flow methods in general accordance with DEQ's *Groundwater Sampling Guidance* from all Site wells except MW1, MW6, and MW7. Samples will be collected with a peristaltic pump with a flow-through cell. Field measurements of ground water quality parameters including pH, temperature, oxidation-reduction potential, specific conductivity, dissolved oxygen, and turbidity will be recorded during ground water sample collection. Depth to ground water measurements will be recorded during the entire low-flow purging and sampling procedure. When the well is considered stabilized, the tubing will be disconnected from the flow-through cell and groundwater samples will be collected directly from the tubing.

Sampling information, including purge volume, will be documented on a field form.

- All ground water samples will be submitted for laboratory analysis of VPH and EPH screen. EPH fraction with PAHs will be analyzed if the EPH Screen threshold is exceeded.
- All groundwater samples will also be analyzed for Intrinsic Biodegradation Indicators (IBIs) consisting of ferrous iron, manganese, nitrates/nitrites, sulfates, and methane.
- Non-disposable sampling equipment will be decontaminated prior to sampling the first well and after each well is sampled.
- Purge water will be disposed of according the DEQ Petroleum Tank Cleanup Section (PTCS) Disposal of Untreated Purge Water from Monitoring Well flowchart.

Section 4 Work Plan Tasks:

The work plan is for one groundwater monitoring event. It is separated into the following tasks.

Task 1: Project Management.

This task includes all correspondence including WP Preparation.

Task 2: Mobilization

One mobilization trip will be necessary.

Task 3: Monitoring.

Costs are included on a Unit Cost Basis

Task 4: Laboratory Analysis w/Fee.

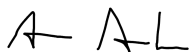
At the conclusion of the November 2026 groundwater monitoring event, MDT will prepare a Standardized Generic Applications Report (AR-07) that includes the data from both groundwater monitoring events and a discussion regarding observed trends. A recommendation for future groundwater monitoring frequency will be included within the report.

Section 5 Reporting

Olympus will prepare a report that includes recommendations as to whether to proceed with the excavation activities.

Don't hesitate to contact Aaron Anderson at (406) 444-0872 or aganderson@mt.gov with any questions or concerns.

Sincerely,



Aaron Anderson
MDT Environmental



Olympus Technical Services, Inc.

Site Topographic Map
Former MDT Maintenance Facility
Swan Lake, Montana

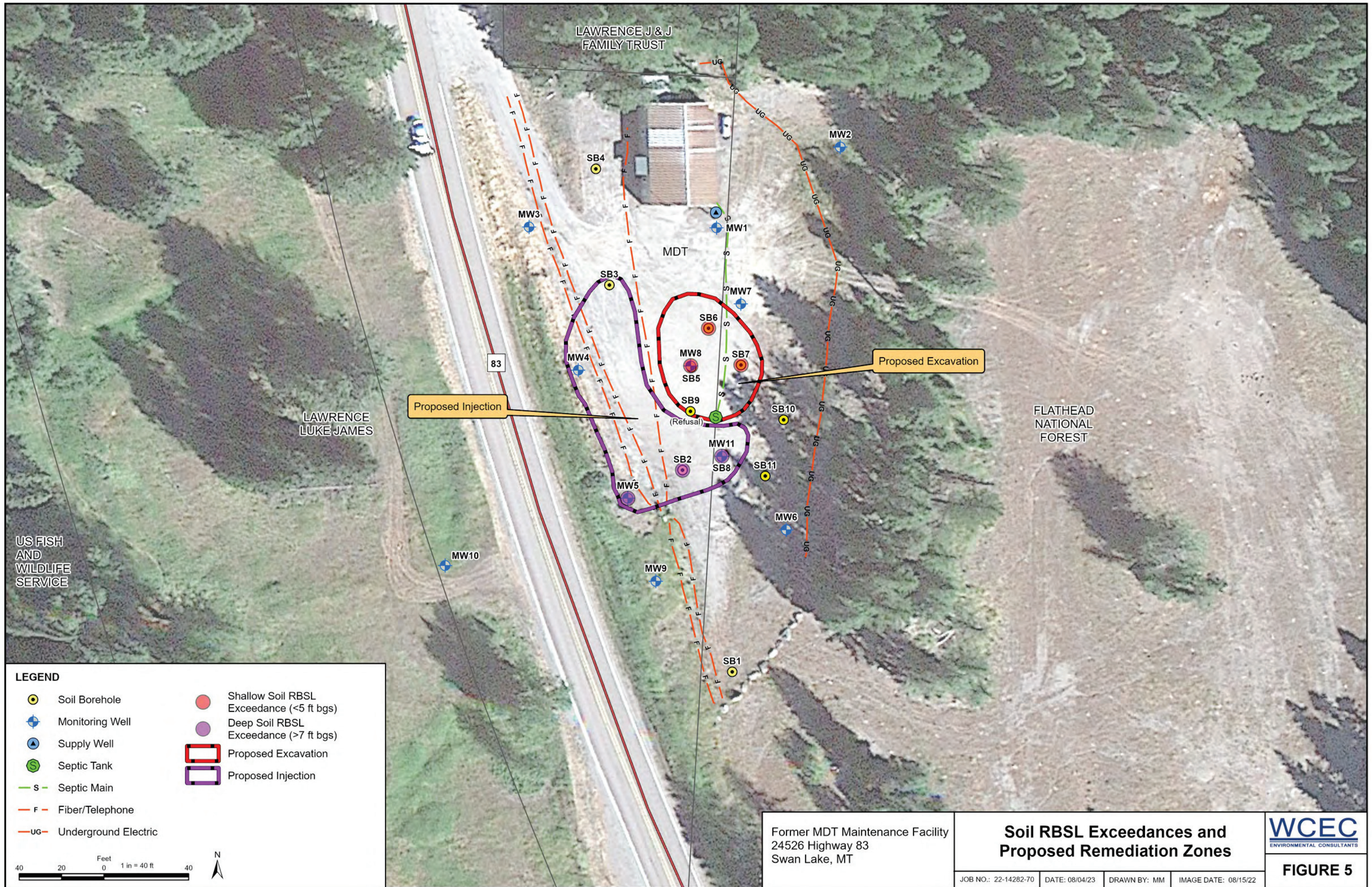
**FIGURE
1**



Olympus Technical Services, Inc.

Site Aerial Map
Former MDT Maintenance Facility
Swan Lake, Montana

FIGURE
2



LEGEND

- Soil Borehole
- ⊕ Monitoring Well
- ⊙ Supply Well
- ⊙ Septic Tank
- s— Septic Main
- - - Fiber/Telephone
- - - Underground Electric
- Shallow Soil RBSL Exceedance (<5 ft bgs)
- Deep Soil RBSL Exceedance (>7 ft bgs)
- Proposed Excavation
- Proposed Injection

Feet
0 1 in = 40 ft 40

N

Former MDT Maintenance Facility
24526 Highway 83
Swan Lake, MT

**Soil RBSL Exceedances and
Proposed Remediation Zones**



FIGURE 5