

Corrective Action Plan 35198

Mountain View Cenex

240 Mountain View

St. Ignatius, MT 59865

Facility ID# 24-10647, Release# 6500, Work Plan ID# 35198

Prepared for:

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Cost Estimates

PTRCB Groundwater Monitoring & Sampling Unit Cost Worksheet

1.0 Introduction

West Central Environmental Consultants (WCEC) has prepared this Additional Corrective Action Work Plan for the Mountain View Cenex (Facility ID# 24-10647, Release# 6500, WPID 35198) located at 240 Mountain View Drive in St. Ignatius, Montana. Additional corrective actions were requested by the Montana Department of Environmental Quality (MTDEQ) in the letter dated June 3, 2026. This work plan details the plan for groundwater analysis to assess if a rebound in groundwater impacts will occur following the suspension of soil vapor extraction (SVE) system operation. This additional data will help determine if additional active remediation is necessary to resolve this release of unleaded gasoline from the underground storage tank (UST) system that occurred on August 27, 2022.

1.1 Site Location

The Stuart's Service Center facility is located at 240 Mountain View Drive in St. Ignatius, Montana. A site location map is included as Figure 1. The Public Land Survey System (PLSS) description for the site is the NW/4, SE/4, NE/4 of Sec. 14, T18N, R20W. The approximate geographic coordinates are N 47.321131°, W 114.099559°. Township, range, and section information was obtained using the United States Geological Survey (USGS) Saint Ignatius, Montana 1:24,000 Quadrangle. The site is located within the Lower Flathead River Hydrologic Unit.

1.2 Site Geology

The surficial geology near St. Ignatius is primarily composed of glacial, fluvial glacial, and flood deposits containing varying amounts of clay, sand, and gravel based on records for wells located less than 1½ miles from the site, and from onsite monitoring well logs. These heterogeneous glacial deposits tend to be laterally discontinuous and are present to depths of 150 feet below ground surface (bgs). The uppermost bedrock units in the vicinity of St. Ignatius are Tertiary volcanics, which are underlain by Pre-Cambrian rocks of the Proterozoic Belt Supergroup. The Belt Supergroup bedrock exposures in the area are further classified as being part of the Wallace Formation, the Ravalli Group, and the Pritchard Formation, all of which are dominated by argillites [CHS, 2004]. The uppermost aquifers in the vicinity of the site are contained in the glacial deposits, which typically have a yield of 10 to 100 gallons per minute (gpm). Groundwater is present at depths ranging from 35 to 40 bgs beneath the site.

A well inventory of the Groundwater Information Center (GWIC) database was completed in order to identify any potential groundwater receptors at risk by the release. Most residences and businesses in the town of St. Ignatius are connected to the municipal drinking water system. According to the GWIC database, the

nearest sources for the municipal water system are located cross-gradient from the site at a distance greater than 2,000 feet, and therefore are not considered to be at risk from the release at the facility. There are no other drinking water wells near the property that would be at risk as a result of the release. The well inventory did identify one irrigation well (GWIC ID = 73473) in close proximity to the subject property, located approximately 100 feet to the north [Figure 2]. According to the GWIC well log, this well appears to be used solely for irrigation purposes. It is also located cross-gradient from the release site based on potentiometric surface calculations from historic and current groundwater monitoring events, and therefore is not considered to be at risk from the release.

2.0 Release History

There are two resolved historical releases associated with the facility. The first release recorded in the State of Montana LUST (Release# 2684) database was reported at the Stuart's Service Center facility on June 27, 1995. The second release was reported to the MTDEQ on June 17, 1996 (Release# 3103) and was closed on January 27, 1997.

Release# 2684 originated following detection of elevated concentrations (1,170 mg/kg) of total purgeable hydrocarbons (TPH) in soil samples obtained during the removal of underground steel piping for an aboveground storage tank (AST) at the facility. The release was described as an unknown quantity caused by leaking piping or spills/overfills which had potentially impacted groundwater. A total of 800 cubic yards of petroleum impacted soil was excavated on January 18, 1996. The excavated soils were transported to a landfarm located at 100 Pierce Lane, near St. Ignatius, Montana. After a period of remediation, the soils at the landfarm were sampled by the MTDEQ and returned results below the Risk-Based Screening Levels (RBSLs). Composite samples obtained from the walls of the excavation pit indicated that residual soil impacts remained at the site, with the highest levels near the northeast corner of the excavated area. Expansion of the C-store building now covers much of the excavated area. The worst case residual contamination identified during the excavation remained near the northeast corner of the current building.

Various additional investigation and remedial actions were conducted from 1996 through 2013 including injection of Oxygen Release Compound in 2012. The last groundwater monitoring event related to Release# 2864 was completed in November 2013. All monitoring wells associated with the facility were abandoned in April 2015 and MTDEQ issued No Further Corrective Action for release 2684 on May 4, 2015.

2.1 Release 6500 Initial Actions

On August 27, 2022 at approximately 08:00, the facility tank monitoring system had a CSLD increase warning which prompted inventory review and investigation. The USTs were found to have low inventory during the subsequent inspection. At approximately 10:00, the facility clerk notified the facility's UST Operator (Stuart Morton) that dispensers were running slowly which prompted additional inventory review. Inventory was found to be significantly lower than the first inspection that morning, and the Operator immediately shut down the UST / fuel dispensing system and called a fuel system contractor (Petrocon). Investigation of the inventory shortage continued on August 27, 2022 until 12:00 when inspection of the turbine sump revealed that a release had occurred from UST system Tank 4 (DEQ UST Permit Tag # 5619). Inspection and visual investigation continued to confirm inventory shortage and the occurrence of a petroleum release. The DEQ Duty officer was notified of the release by Stuart Morton on August 27, 2022 at approximately 14:00 upon

completion of inventory reconciliation that indicated a significant shortage and probable release of an estimated 4,600 gallons of unleaded gasoline.

WCEC was contacted regarding the release on August 27, 2022 at approximately 15:00 and initiated response management actions. On August 29, 2022, WCEC mobilized a GeoProbe to the site and installed 2 borings into the tank basin fill to total depths of 13 feet, corresponding to the bottom of the USTs and UST basin fill material. The borings were completed with 5 feet of 2" PVC screen with solid PVC riser extending to grade. Both of these recovery points were dry with no product present. WCEC personnel attached a 1HP soil vapor extraction (SVE) blower to the recovery points for vapor assessment and potential extraction. Initial photoionization detector (PID) readings from the SVE effluent were 2,300 ppm and then declined to 700 ppm after an hour of operation where they remained for approximately 2 hours prior to system shut down.

WCEC continued the initial response and investigation on August 29 and 30, 2022. A soil boring (SB1) was advanced to 40 feet bgs in a location immediately downgradient of the tank basin (30 feet horizontally from the source UST). The geology and hydrocarbon concentrations encountered in SB1 consisted of:

- 1 to 8 feet: Silt, no HC odor
- 8 to 16 feet: Silt, no HC odor
- 16 to 29 feet: Gravels, dry, very little fines, no HC odor
- 29 to 40 feet: Gravels with fines, till. Moist at 30 feet to saturated at 40 feet, HC odor from 30 feet to 40 feet with PID readings of 250 ppm to 700 ppm.

The observed geology at SB1 indicated that coarse grained materials (gravelly till) begin at 16 feet bgs in the vicinity of the UST basin, which corresponds to a relative depth approximately 3 feet below the bottom of the USTs. Based on these observations and the lack of product accumulation in the recovery point installed in the UST basin fill, WCEC determined that the released product traveled vertically to the soil/groundwater interface beneath the tank basin. Subsequently, SB1 was completed as a monitoring well MW1 [Figure 2] to evaluate potential impacts to groundwater. No free product or sheen was observed during development of MW1 on August 31, 2022 or during the initial groundwater monitoring event on September 12, 2022. Analytical results from the initial groundwater monitoring event at MW1 contained high dissolved concentrations of gasoline derived constituents including benzene (1,360 ug/L) and TPH (31,200 ug/L).

Results from the September 12, 2022 groundwater monitoring event confirmed impacts to groundwater and prompted additional investigation to determine the extent and magnitude of impacts to soil and groundwater and assess potential risks to various receptors. The MTDEQ issued Task Order 9 under Contract 421033 on November 11, 2022, Task Order Modification 9A on December 16, 2022, and Task Order Modification 9B on April 24, 2023, requesting a remedial investigation to define the extent and magnitude of petroleum impacts related to Release 6500.

2.2 Remedial Investigation 2022/23

Remedial investigation activities conducted from August 2022 through May 2023 included completion of 19 soil borings, installation of 8 groundwater monitoring wells, groundwater monitoring, installation of a vapor extraction well (VEW1), and SVE effluent sampling [WCEC, 2023]. VEW1 was installed during the December 2022 well installation event and is located immediately north of the UST basin, between the release source and the facility building [Figure 2]. In order to generate vacuum at VEW1, a 1.0 horsepower regenerative blower (Rotron) was connected at the surface via a Landtec Accu-flo Well Head equipped with an air flow meter, vacuum gauge, and sample port for collection of effluent samples. The SVE system was contained in a temporary protective housing near the dispenser island. System operation began on January 18, 2023 and was operated until October 2, 2025.

3.0 Scope of Work

The scope of work requested by the MTDEQ consists of:

- Monitor, gauge, and sample groundwater at Facility monitoring wells. Collect groundwater samples using low-flow methods according to DEQ's Groundwater Sampling Guidance at the PTCS webpage.
- Analyze groundwater for petroleum constituents as required by the Montana Risk-Based Corrective Action Guidance for Petroleum Releases.
- Dispose of purge water according to the Disposal of Untreated Purge Water from Monitoring Wells flowchart found under the Guidance dropdown at the PTCS webpage.
- Validate laboratory analytical data using DEQ's Data Validation Summary Form (DVSF) found under the Guidance dropdown at the PTCS webpage.
- Discuss ongoing WP tasks and results with DEQ's project manager; submit written agreed-upon WP modifications as required to complete the WP objectives.
- Prepare an updated Release Closure Plan (RCP); discuss results with DEQ's project manager. Use the RCP format found online under the Guidance dropdown at the PTCS webpage.
- Prepare and submit one groundwater monitoring report detailing the results of both semiannual events conducted under this corrective action plan. The Report will contain the following:
 - Recommendations for additional remedial actions required to resolve the release.
 - Discussion of groundwater monitoring methods, results, conclusions, and recommendations.
 - Cumulative groundwater data tables.
 - Updated site features and potentiometric surface maps.
 - An updated Release Closure Plan (RCP).
 - Append all groundwater monitoring and O/M field forms, laboratory analytical data, completed DVSFs, and the updated RCP.

4.0 Groundwater Monitoring

4.1 Groundwater Monitoring

Groundwater monitoring will be performed on a semiannual basis to evaluate constituent concentrations during varying seasonal conditions and assess the potential for a rebound in constituent concentration following the shutdown of the SVE system. Depth to water measurements will be recorded from site wells to provide an accurate potentiometric surface plot, flow direction, and gradient. Groundwater wells will be sampled and analyzed according to the following chart.

Analytical Analysis Chart				
Sample Location	VPH	EPH	Lead Scavengers	Depth to Water only
MW1	x			
MW2	x			
MW3				x
MW4	x			
MW5				x
MW6	x			
MW7				x
MW8	x			
Duplicate MW2	x			
Analysis per event	6	0	0	3
Total all events	12	0	0	6

Well sampling will be conducted according to WCEC Standard Operating Procedures (SOPs) and MTDEQ Guidance for low-flow sampling using a bladder pump for purging and sample collection [MTDEQ, 2018a]. Groundwater quality parameter data (conductivity, pH, salinity, dissolved oxygen, temperature, turbidity, and ORP) will be acquired during well purging using a flow through cell attached to the peristaltic pump. Purge water will be handled according to the MTDEQ Purge Water Disposal Flowchart.

Groundwater sample collection will be completed following stabilization of groundwater quality parameters. Groundwater quality parameter, purge, and stabilization data for each well are recorded in the field using WCEC's Well Sampling Form. If present, any accumulations of free product (FP) in the monitoring wells will be noted and FP thicknesses will be recorded. Groundwater samples will not be collected from any wells that contain a measurable thickness of FP. WCEC will contact MTDEQ if FP is encountered during any monitoring

events to discuss FP recovery, handling, and disposal. A Form 8 Work Plan Modification will be prepared if FP recovery is necessary.

Groundwater samples will be preserved with hydrochloric acid, packed on ice, and delivered to Energy Laboratories in Helena, Montana under chain of custody. All groundwater samples will be submitted for analysis of VPH constituents as outlined in MTDEQ guidance. Well sampling will be conducted using low flow sampling methodologies in accordance with MTDEQ requirements and WCEC SOPs. WCEC will use a peristaltic pump to purge and sample each monitoring well. Groundwater quality parameter data (conductivity, pH, salinity, dissolved oxygen, temperature, ORP, and turbidity) will be acquired from all site wells sampled during each event using a flow through cell. Groundwater sample collection from each well will be completed following stabilization of groundwater quality parameters. Static water levels, groundwater quality parameter, and purge rate for each well will be recorded in the field using WCEC's Well Sampling Form. Depth to water measurements will be collected from all site wells to use in calculating the potentiometric groundwater surface, flow direction, and gradient for each event.

Purge water will be properly handled according to the MTDEQ Purge Water Disposal Flowchart. WCEC does not anticipate that any site wells will contain free product or RCRA listed or characteristic waste. Water will be collected from the shallowest aquifer and based on the current known impacts at the site it is not anticipated that purge water will contain enough petroleum hydrocarbons to result in exceedances of soil screening cleanup levels if it is disposed of on the ground surface. The distance to surface water from the facility does not present any potential for directly reaching groundwater. Based on these anticipated realities, WCEC plans to dispose of purge water on a permeable ground surface at the site. If free product is identified in any of the purge water obtained from site wells, WCEC will purchase portable gasoline containers for containment and transport back to their office in Missoula, MT. In this event WCEC will submit a Form 8 adjustment of the work plan to cover disposal costs associated with proper disposal through an oil recycler.

Groundwater samples will be preserved in accordance with analytical methods, packed on ice, and shipped to Energy in Helena, Montana under chain of custody. All groundwater samples collected will be submitted for VPH analyses [MTDEQ, 2018b].

4.2 Report Preparation

Release Closure Plan

WCEC will complete an RCP outlining basic information pertaining to the release, a conceptual site model, evaluation of cleanup alternatives, and assessment of future compliance monitoring. The RCP will be included as an appendix of the annual monitoring report.

Data Validation

WCEC will complete the MTDEQ – Waste Management and Remediation Division Data Validation Summary Form (DVSF). WCEC will submit one field duplicate sample for analysis of relative percent difference (RPD) of groundwater laboratory results. WCEC will collect a duplicate sample from monitoring wells MW2. This duplicate sample will be labeled MW-D. The completed data validation form will be included as an appendix to the remedial activities report.

Remedial Activities Report

WCEC will submit a Groundwater Monitoring Report to the MTDEQ within 60 days of receipt of all laboratory analytical results. The report will cover both semiannual events and any monitoring well repairs that are conducted under this corrective action plan. The report will include all necessary sections defined by the Montana Groundwater Monitoring Work Plan and Report Guidance for Petroleum Releases. These include a brief site history, description of site location and geolithology, and a summary of all remedial actions conducted under corrective action plan 35198. WCEC will include cumulative tables for groundwater elevations, groundwater chemistry, and analytical results. Maps will be provided detailing the site location, bulk petroleum storage and dispensing equipment, utilities, monitoring wells, SVE/AS system, and potentiometric surface plot depicting groundwater direction and gradient for each sampling event. The complete laboratory analytical reports, RCP, and DVSF will be included as appendices of the report.

5.0 Estimated Costs & Project Timeline

The scope of work outlined in this work plan is tentatively scheduled to begin in October/November 2026, pending approval from the MTDEQ. The attached *PTRCB Groundwater Sampling & Unit Cost Worksheet* details anticipated project costs to complete the MTDEQ required scope of work.

5.1 Planned Workflow & Cost Explanations

WCEC will complete the scope of work included in this work plan during 2 individual field events:

Events 1 – Low groundwater monitoring Fall 2026: Initial groundwater monitoring event (October 2026).

Events 2 – High groundwater monitoring Spring 2026: Second groundwater monitoring event (May 2027).

Corrective Action Report: Final report submittal to MTDEQ (July 31, 2027).

Estimated dates above are dependent on the work plan approval date. A work plan completion date of December 1, 2027, is requested for this corrective action plan.

6.0 References

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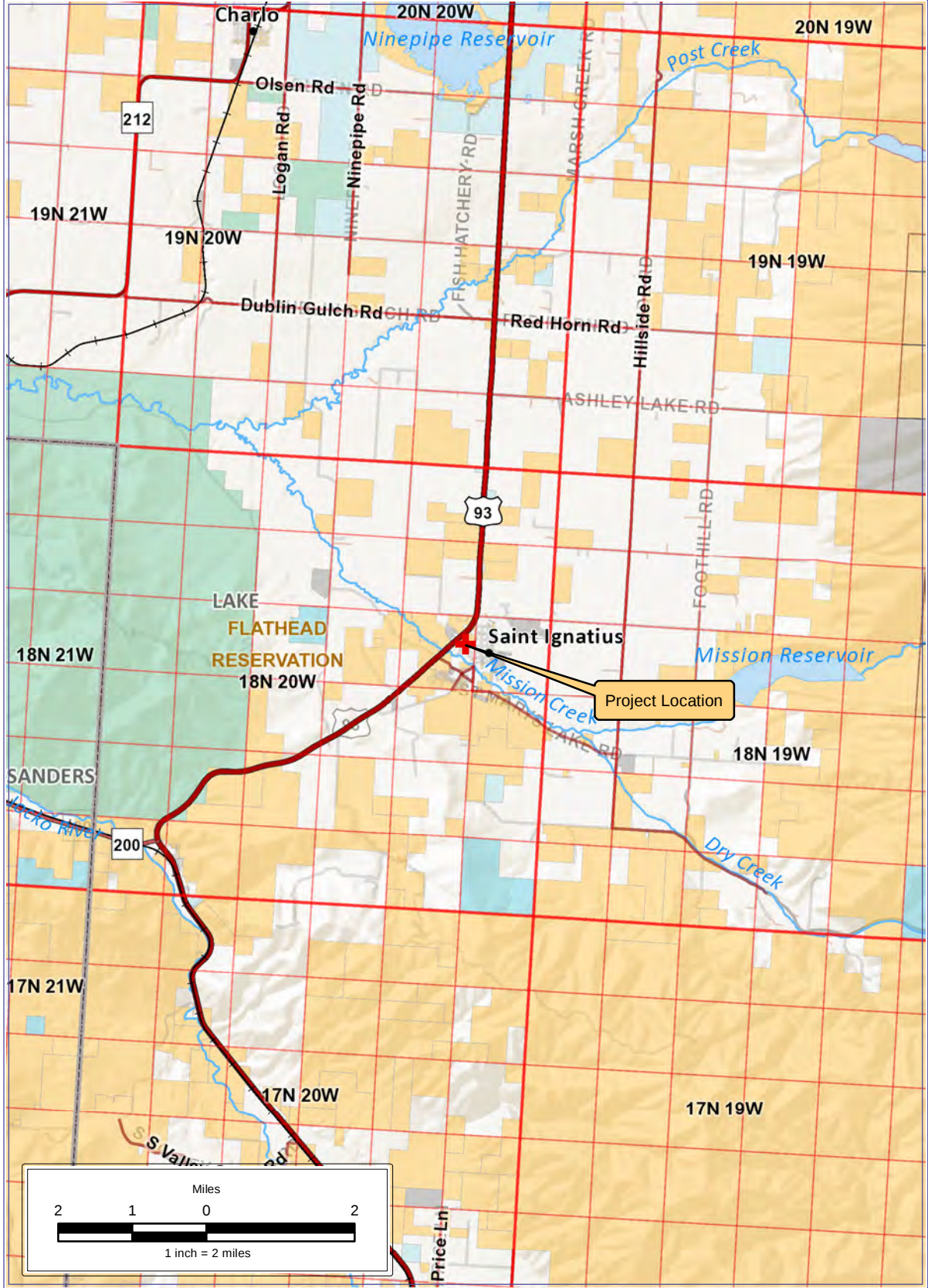
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Figures

Figure 1: Site Location Maps

Figure 2: Site Details



✖ Site Location



Site Location Maps

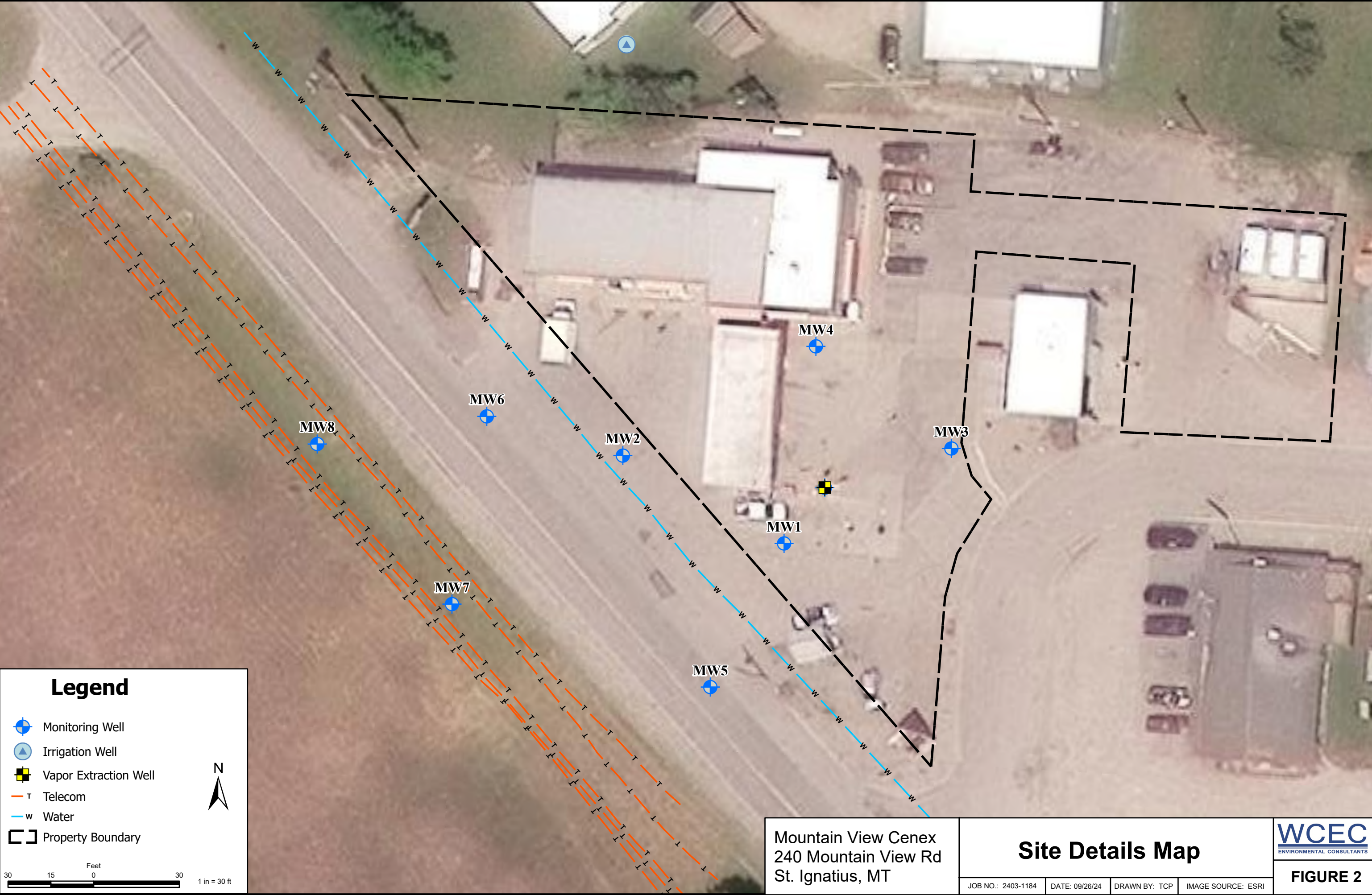
Mountain View Cenex
240 Mountain View Road
St. Ignatus, MT

DRAWN BY: MM
DATE: 03/15/23
SCALE: 1:12,000



PROJECT NUMBER: 22-14738-70 IMAGE SOURCE: ESRI BASEMAPS

FIGURE 1



Legend

- Monitoring Well
- Irrigation Well
- Vapor Extraction Well
- T Telecom
- W Water
- Property Boundary



30 15 0 30
Feet
1 in = 30 ft

Mountain View Cenex
240 Mountain View Rd
St. Ignatius, MT

Site Details Map

JOB NO.: 2403-1184 DATE: 09/26/24 DRAWN BY: TCP IMAGE SOURCE: ESRI

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FIGURE 2