



# AJM, Incorporated

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A Full Service Environmental Company

April 17, 2024

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**Subject: Soil sampling Excavation plan for UST Tank Basin facility located at Town Pump Inc., 415 N. Whitehall Street, Whitehall, Jefferson County, Montana; Facility ID 22-03645, TREADS ID 22528, Release 6639, Work Plan 34846**

The underground storage tank system at the Whitehall facility has seven (7) USTs that will be removed by a certified tank remover per Montana Department of Environmental Quality (DEQ) requirements in early May 2024. These tanks are between 35 and 50 years old. Although the tanks are in compliance with ATG and line testing being conducted, historical spills may be present that will warrant soil removal and groundwater is at approximately 12 feet below ground surface.

The purpose of this letter is to provide guidance and clarity for the sampling and stockpiling/removal of soils should there be any petroleum hydrocarbon impacts discovered during the removal process. Determining relative extent and magnitude of potential impacted soils and providing soil source removal will be easiest and most efficient when the excavation is open and equipment is on site. If impacted soils are present, this information will be called into the DEQ Petroleum Release Cleanup Section under release number 6639. UST sampling procedures will follow guidelines set by the Montana DEQ as well as the following:

- Sampling will be coordinated with DEQ representative.
- Photoionization will be collected using heated head space.
- Onsite analysis using Oil-In-Soil kits will determine qualitative impacts versus impacts left in place due to volume constraints. Laboratory samples will be collected to determine the quantitative data of soil impact at the bottom of the excavation.
- Except when practical, soil impacts only seen at the water table will be left in place as not to require extensive overburden removal.
- Up to an additional six soils samples could be collected in the UST basin along with the standard samples collected during a UST removal. Should significant impacts be seen, a rush soil sample for VPH, EPH and metals will be taken to energy laboratories so that a profile can be sent to the landfill for soil acceptance.
- Per discussions with Montana DEQ and the Petroleum Tank Release Compensation Board (PTRCB), this site will be allowed to stockpile and/or transport up to 200 yards of soil, instead of the standard 100 yards.
- Based on transportation cost and backfill gravel location, it is anticipated that the best place to haul the soils will be to the Logan landfill.
- Fuel line soil samples will be collected following the standard requirements set by Montana DEQ and excavation of any piping impacts is not a part of this tank basin work.
- Laboratory samples will be collected and sent under chain of custody to an accredited laboratory for EPH and VPH.

This letter serves to provide documentation of discussions with the DEQ and PTRCB to ensure proper and efficient soil removal in case petroleum impacts are discovered when the USTs are removed.

The cost associated with this process will be separate than the tank removal cost. Standard PTRCB approved rates for AJM on-site management and lab samples will apply. The contractor for soil excavation and covered stockpile of up to 200 yards of soil will be \$labor and cover material. Or a price of \$yard to dig, haul to landfill and bring in backfill material for compaction. A landfill fee of \$ton will be a separate charge (per PTRCB rule, landfill charge will not be marked up).

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Dennis Franks, President

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