Corrective Action Plan

35145

Town Pump Inc. Eureka

10 Dewey Avenue

Eureka, MT

Facility ID 27-08699 (TID 24240),

Release 6674, Work Plan 35145

Prepared for:

Paul Townsend
Town Pump, Inc.
PO Box 6000
Butte, MT 59702

Prepared by:

West Central Environmental Consultants, Inc.

1030 South Ave. W.

Missoula, MT 59801

April 1, 2026

WCEC Project No. 2602-0517

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1.0 Introduction

West Central Environmental Consultants (WCEC) has prepared this corrective action plan (CAP) for Remedial Investigation at the Town Pump in Eureka (Facility ID 27-08699 (TID 24240), Release 6674, Work Plan ID 35145). The corrective action plan was generated in response to the request by the Montana Department of Environmental Quality (MTDEQ) on February 9, 2026.

1.1 Site Location

The Town Pump facility in Eureka, MT is operated as a gas station and truck stop convenience store. The release occurred on August 4, 2024, when the premium gasoline product line leak detection equipment shut down the product line. Due to this automated leak detection shut down event, Town Pump completed a 3.0 gallon/hour line test, which did not pass protocols. Following this test Town Pump contracted a UST vendor to run additional manual tests on the premium gasoline line. These tests showed a pressure drop in the line indicative of a line leak.

A site location map and a site details map are included as Figure 1 and 2. The Public Land Survey System (PLSS) description for the site is the NE/4, SW/4, of Section 14, T61N, R27W. The approximate geographic coordinates are Latitude 48.8785°, Longitude -115.0523°. Township, range, and section information was obtained using the United States Geological Survey (USGS) Eureaka North, Montana 1:24,000 Quadrangle. The site is located within the Tobacco River Hydrologic Unit.

1.2 Geologic/ Hydrogeologic Setting

The surficial geology at the site consists of glacial and fluvioglacial deposits gravel and large cobble. This surficial layer is underlain by bedrock of the Purcell Lava and the Snowslip Formation from the Middle Proterozoic. Outcrops of these bed rock formations are visible to the east and west approximately 200 yards from the site. It is anticipated that these bedrock formations are at relatively shallow depths, but they have not been encountered during soil boring or well installation activities. Groundwater at the site is anticipated to be present at 5 to 10 feet below ground surface and will likely fluctuate with seasonal flows in Sinclair Creek and the Tabacco River.

2.0 Site History

2.1 Current UST System

The current facility has three UST basins and associated pump islands. One UST basin on the southern side of the facility along Schagel Way contains four 10,000 gallon gasoline tanks, and one 10,000 gallon diesel tank. All of these tanks are constructed of single wall fiberglass. The piping in this tank basin is constructed with fiberglass reinforced plastic, and it was the system that experienced the line leak. This tank basin and piping was installed in 1991.

The UST basin located north of the intersection of Schagel Way and US Highway 93 includes a 5,000 gallon diesel tank and a 10,000 gallon gasoline tank. This tank basin was constructed using double wall fiberglass tanks. All of the associated piping is constructed with double wall fiberglass piping. This tank basin was installed in 2000.

The third tank basin is located at the southeast corner of the facility and is connected to the truck fueling islands. This tank basin includes an 8,000 gallon multi-compartment tank, a 20,000 gallon gasoline tank, and an 8,000 gallon diesel tank. These tanks are all constructed with double wall fiberglass and have double wall fiberglass piping.

2.2 Release Discovery

The release occurred on August 4, 2024, when the premium gasoline product line leak detection equipment shut down the product line. Due to this automated leak detection shut down event, Town Pump completed a 3.0 gallon/hour line test, which did not pass protocols. Following this test Town Pump contracted a UST vendor to run additional manual tests on the premium gasoline line. These tests showed a pressure drop in the line indicative of a line leak.

Town Pump dispatched a repair vendor on Aug. 5, 2024 for troubleshooting. The vendor ran a manual test on the premium gasoline line but could not get it to hold pressure. Additional helium testing was needed to locate the line leak and helium detection equipment and tanks were ordered to allow for additional testing.

During helium leak detection testing on August 13, 2024, it was found that the premium gasoline product line was leaking just before Fueling Position 9/10 at the end of the run. The leak was approximately located between the western pump islands near the center of the canopy.

The fuel vendor obtained Permit 25-0028 and repairs were completed on Aug. 21, 2024. It was reported to Town Pump that a joint with a piping "T" was leaking and was repaired. After repairs were made, the piping was retested and passed. It was reported that the underlying soils had a slight petroleum odor but were not saturated. A soil sample was collected approximately two feet beneath the repaired piping and analyzed for VPH and EPH per the DEQ Work Permit. The analytical results were emailed to Montana DEQ on Sep. 17, 2024. The results of this sample are included in Table 4 of this report.

2.3 Surrounding Properties & Facilities

Adjacent properties to the facility include a restaurant and office building to the north, the Eureka Volunteer Ambulance Service to the east, open space containing Sinclair Creek to the south, and the Eureka Town Hall and Chamber of Commerce to the west. Groundwater flow direction is to the west across US Highway 93 towards the Eureka Town Hall.

The Montana DOT right-of-way has a release associated with it south of Sinclair Creek (facility ID 24-535, Release 2784). This soil contamination was discovered during excavation of the highway and may have been associated with an old mill.

Peltier Oil Co release 2801 is located approximately 1 block north of the Town Pump facility (Facility 27-05225, Release 2801). This release is listed as active at the current time.

It is not anticipated that these other releases will have any comingling issues based on distance and observed soil impacts.

2.4 Soil Boring and Groundwater Monitoring Well Installation 2025

Seventeen soil borings were completed in 2025 and 5 monitoring wells were installed to define impacts near the release location and across the right-of-way to the south and west in the expected direction of groundwater flow. All borings were completed to a depth of 20 feet. Eleven of the seventeen soil boring locations exceeded one or more RBSL for VPH constituents of concern during the initial investigation.

Five monitoring wells were installed following the soil boring investigation in areas of delineated impacts. The locations of these monitoring wells are depicted on the Site Details Map that is included as Figure 2. Monitoring wells were constructed with 2 inch PVC and installed to a depth of 18 feet below ground surface with 15 feet of screen and 3 feet of solid riser. All wells were completed with flush mount monuments.

3.0 Corrective Actions – Work Plan 35145

3.1 Soil Boring and Field Screening in Down Gradient Locations

Additional soil boring investigation of hydrocarbon impacts down gradient of the west/southwest edge of the hydrocarbon plume to define the extent of impacts. This will include areas north of Sinclair Creek in river side park, the right-of-way of Tobacco River Ln., and on the south and west side of the Eureka Town Hall [Figure 3]. Based on the findings from the 2025 soil boring and groundwater monitoring events, up to 16 more soil borings may be required to define impacts toward Sinclair Creek or the Tobacco River.

All soil borings will be completed using dual tube boring methods. Soils from each boring will be field screened using a Rae Systems MiniRae™ 3000 photoionization detector (PID), as well as visual and olfactory evidence to determine which horizons may be impacted. The PID will be calibrated using fresh air and span gas calibration points. Isobutylene span gas at a concentration of 100 parts per million (ppm) will be used in the calibration procedure. Soil samples for on-site screening will be placed in plastic zip lock bags. Each bag will be one third filled with soil and sealed trapping volatile organic compounds in the headspace. Headspace development will be allowed to proceed for a minimum of 2 minutes; each bag will be shaken for 15 seconds before and after this period. The PID probe will then be inserted into the head space of the bag to measure the hydrocarbon compounds that have volatilized into the contained head space. The maximum PID response over a 5 second period will be considered the result of this field screening technique. Borings will be initiated adjacent to the downgradient edge of hydrocarbon impacts delineated in 2025. Additional borings will be located in downgradient areas based on apparent impacts identified through field screening.

Each individual soil boring will be logged in the field using the Unified Soil Classification System (USCS). Field logs will include details of depth, soil recovery, USCS code, sample depth, and PID reading.

Soil sampling will be based on field screening results. If field screening exhibits hydrocarbon impacts in the soil horizons of 0-2ft or 2-10ft (anticipated groundwater interface), a soil sample will be collected. Two soil samples could be collected from each boring under this sampling protocol if both soil horizons are impacted. During the field screening process, the onsite project manager will assess if additional soil samples are needed to define vertical anomalies in the hydrocarbon plume. An additional five soil samples are budgeted for vertical delineation of the hydrocarbon plume based on PID field screening and the judgment of the onsite project manager. If no hydrocarbon impacts are identified in the field screening process, one soil sample will be collected from the groundwater interface.

Soil samples will be collected using WCEC Standard Operating Procedures (SOPs), and in accordance with MTDEQ requirements. Soil samples will be collected in pre-preserved vials with pre-weighed and measured volumes of methanol noted on the sample vials. A laboratory provided volumetric soil sampling syringe will

be used to collect the soil from the soil boring core. If any methanol is lost during sampling from a spill, splash, etc. it will be discarded, and replacement sample will be collected. Following sample collection, samples will be packed on ice and submitted under chain of custody to Energy Laboratory, Inc. (Energy) in Helena, Montana. One QA/QC soil samples will be collected during the soil boring event for assessment of analytical laboratory accuracy. This sample will be labeled BHD.

All soil samples will be analyzed for volatile petroleum hydrocarbons (VPH) and extractable petroleum hydrocarbon (EPH) screen. Soils that exceed the EPH screening limit of 200 mg/kg will be analyzed for TEH fractions.

3.2 Monitoring Well Installation & Surveying

WCEC will install up to 7 additional monitoring wells at downgradient location delineated during the soil boring investigation. These monitoring wells will be installed using 4.25 inch I.D. hollow stem auger tooling. The groundwater monitoring wells will be constructed using a 2-inch schedule 40 PVC riser and 0.010 slot PVC screen. Each monitoring well will be screened from 3 to 18 feet below ground surface (bgs) with solid riser extending from 3 feet bgs to near ground surface. The well annulus will be filled with 10/20 silica sandpack from the bottom of the boring to 6 inches above the screened interval, with the remainder of the boring annulus consisting of a bentonite seal. Surface completions will be constructed using 8-inch flush mount monuments set in concrete. Soil cuttings will be drummed up for disposal at the Republic Services Class II Landfill in Missoula, MT.

WCEC will survey the top of casing on all monitoring wells at the facility to The Forth Order (0.10 feet times the square root of total distance of the level loop in miles) with a level loop measurement precision of 0.01 feet. The latitude and longitude of all site wells will be surveyed using a Trimble Geo 7X GPS with 1-centimeter post processed accuracy. Site well casing elevations will be correlated to the North American Vertical Datum of 1988 (NAVD 88) using an onsite elevation control point which will be created using the Trimble Geo 7x GPS.

3.3 Monitoring Well Development

Monitoring well development will be completed using a combination of surging and over pumping. Surging involves raising and lowering a surge block inside the well. This generates a hydraulic surge which forces water into the formation and loosens sediments allowing them to be pulled from the formation into the well. This surging is completed for approximately 5 minutes and then is followed by pumping using a down hole pump. A total of 5 well volumes are pumped following surging, with the process repeated up to 4 times or until water being purged from the well exhibits minimal fines. This will achieve the purpose of monitoring

well development, which is to ensure removal of fines from the vicinity of the well screen and allow free flow of water from the formation into the well. Purge water will be poured on the ground surface in the gravel area on Town Pump property where the SVE/AS pilot study will be conducted. If free product is identified in a well water, it will be containerized for transport to Missoula, and disposal through an oil recycler. A Form 8 will be submitted for this cost in the event that this occurs. This well development helps reduce the turbidity during future groundwater monitoring events. Groundwater quality parameter data (conductivity, pH, salinity, dissolved oxygen, temperature, ORP, and turbidity) will be collected from each well prior to and following well development. Groundwater quality data will be recorded after removing a volume of 1 Liter (approximately three times the volume of the YSI flow-through cell). Analytical groundwater samples will be collected no sooner than one week after well development is completed.

4.0 SVE/AS Pilot Study

4.1 SVE Pilot Study Overview

The 2025 soil boring investigation identified impacted soils near the known release location. This area contained soils that are amenable to soil vapor extraction and air sparge technologies based on soil lithology. A portion of these impacts are located around and underneath the fueling island canopy area and have limited accessibility using other technologies. It is expected that this area LNAPL impacted soil is going to be a source of ongoing groundwater impacts if they are not addressed through active remediation. Based on the depth below ground surface, surface impediments, and soil lithology, soil vapor extraction (SVE) and air sparge (AS) technology appears to be the most cost effective method of remediating these soil impacts.

The objectives of the SVE pilot study are to determine the optimum vacuum and flow rate for an SVE system and to calculate the effective radius of influence (ROI) for onsite vapor extraction wells (VEWs). SVE pilot testing will be conducted during seasonal low groundwater conditions present from mid-summer through fall when the smear zone is maximally exposed.

4.2 SVE/AS Pilot Study Methodology

A vapor extraction well (VEW) will be installed on the northern edge of gravel landscaping at the approximate closest point to the release location. This will allow the installation of temporary vapor points (VP1-VP6) in a radial arc to the south of the proposed VEW. These points will be installed between the proposed VEW & AS wells at distances of approximately 5 feet, 10 feet, 15 feet, 20 feet, 25, and 30 feet to observe changes in static soil pressures. A vapor point near the AS well is needed since the construction of air sparge wells prevents their use as a soil vapor pressure point during the SVE pilot study phase. An air sparge well will be placed at the other end of this set of vapor points to allow an air sparge pilot test to be conducted following the completion of the soil vapor extraction test. Static pressure at distance from the AS well will be recorded in the vapor points and VEW well during this pilot test. The soil pressures recorded during the SVE and AS pilot test will be used to calculate the radius of influence (ROI) that can be expected from each well. WCEC will provide all equipment, labor, and materials to complete vapor monitoring point installation.

Vapor monitoring points will be constructed in 3.25 inch diameter soil borings advanced by direct push to a terminal depth of approximately 10 feet. This depth will allow for monitoring of soil vapor pressures and groundwater depth during the AS pilot study. The bottom 6 feet of each vapor point will be filled with 10/20 silica sand around the vapor point. The annular space around the 1 inch PVC will then be sealed with hydrated granular bentonite from the top of the silica sand pack to the surface. These vapor points will be

completed with 4-inch monuments placed in concrete. In addition to the 6 vapor points installed for the SVE pilot study, adjacent groundwater monitoring wells will be used as distal vapor monitoring points.

In order to generate a vacuum at the test VEWs, a 1.0 horsepower regenerative blower (Rotron) will be connected to the VEW well head equipped with anemometer, vacuum gauge, and port for collection of soil gas data, volatile organic vapor data, and effluent samples. The pilot tests will consist of three consecutive stages at each VEW (Stage 1, Stage 2, and Stage 3) in which the blower at the VEW will be operated at incrementally higher flow rates and resulting applied vacuum. Static soil vacuums will be monitored regularly (every 15 minutes) at the vapor monitoring points throughout the duration of the three stages. Groundwater elevation data will also be collected prior to initiation of SVE pilot testing. Each individual stage will be conducted for at least 2 hours and continue until vacuum readings at the vapor monitoring points have stabilized. Once stabilization has occurred, applied vacuum at the VEW will be increased to a higher setting to begin the next stage of testing.

The following parameters will be collected from the VEWs at regular intervals during each of the three stages: Air flow rate, vacuum, methane concentration, carbon dioxide concentration, oxygen concentration, and total volatile organic compounds (VOCs). A magnehelic gauge set will be used to measure static vacuum at each vapor monitoring point. An Eagle 2 four gas monitoring will be used to measure soil gas concentrations and effluent VOCs will be measured in the field using a photoionization detector (PID) calibrated with isobutylene span gas. To estimate source intensity and recoverability, a sample of the VEW effluent will be collected during each pilot test stage using a volume calibrated low-flow sampling pump and charcoal tubes. VEW effluent samples will be submitted to ALS Environmental in Salt Lake City, Utah for laboratory analysis of gasoline range organics (GRO), benzene, toluene, ethylbenzene, and total xylenes (BTEX).

One AS well will be installed approximately 30 feet from the SVE well. This will allow for the use of the same vapor points during both the SVE and AS pilot studies. A 1.5 horsepower rotary vane compressor will be manifold to the AS well head for the duration of the pilot study. Positive pressure in the vapor points and monitoring wells surrounding the AS well will be measured every 15 minutes until pressures stabilize. Vapor points and monitoring wells will be monitored for changes in soil gas and VOCs at each vapor monitoring location throughout the AS pilot study.

4.3 Air Sparge Well Drilling

Prior to well drilling a private utility locate of the Town Pump facility will be conducted to identify buried electrical lines in the area. One AS wells will be installed at the site. The AS wells will be located in the area of MW2 [Figure 4]. The AS wells will be drilled to a depth of 18 feet and constructed with 2 feet of 0.010 screen and 16 feet of solid riser. A silica sand pack will be completed from the bottom of boring to 6 inches

above the screened interval. Coated bentonite pellets will be used in the completion of this well to ensure a proper seal below the groundwater interface. The well will be completed with a 12-inch flush mount monument. The AS wells will be plumbed with a 2-inch PVC T and gate valve to allow for future connections of the well to an AS system.

4.4 VEW Well Drilling

One VEW will be installed at the site. The VEW well will be located at the northwestern most point of gravel landscaping along US Hwy 93. It will be drilled to a depth of 6 feet below ground surface and be constructed with 2 feet of 4-inch 0.010 slot PVC screen and 4 feet of solid riser. The SVE well will be completed with a 12-inch flush mount monument and plumbed with a 2-inch PVC T and gate valve to allow for future connection of the well to an SVE system.

5.0 Groundwater Monitoring

5.1 Groundwater Monitoring

WCEC will complete semiannual groundwater monitoring events for a period of one year. It is anticipated that the initial monitoring event will be conducted in May or June 2025 during high groundwater conditions at the facility, with the second semiannual event being conducted in October or November 2025. The initial groundwater monitoring event will be conducted no sooner than one week after monitoring well installation. Groundwater samples will be collected from monitoring wells MW2-MW5 and all the newly installed monitoring wells. One duplicate sample will be collected from monitoring well MW3 for QA/QC. This sample will be labeled MWD. 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. Depth to groundwater will be measured throughout the purging process to ensure that draw down of the well does not exceed 0.3 ft below the initial depth to water measurement. 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 parameters, and purge rate for each well will be recorded in the field using WCEC's Well Sampling Form. Depth to water measurements will be used to calculate the potentiometric groundwater surface, flow direction, and gradient for each event. Planned analytical analysis is tabulated below.

Analytical Analysis Chart						
Sample Location	VPH	EPH	EPH for PAHs	Lead Scavengers	IBI or Injection parameters	Depth to Water only
MW1						x
MW2	x	x	x			
MW3	x	x	x			
MW4	x					
MW5	x	x				
New well 1	x	x				
New well 2	x	x				
New well 3	x	x				
New well 4	x	x				
New well 5	x	x				
New well 6	x	x				
New well 7	x	x				
Duplicate QA/QC	x					
Analysis per event	12	11	2	0	0	1
Total all events	24	22	4	0	0	2

Purge water will be properly handled according to the MTDEQ Purge Water Disposal Flowchart. WCEC does not anticipate any of the new wells to 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 a potential for purge water directly reaching these streams if applied to unpaved surfaces. 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 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 analytical analysis according to the sampling chart above.

6.0 Soil Vapor Point Installation & Sampling

6.1 Soil Vapor Point Installation

In the Montana Vapor Intrusion Guide (MVIG) the Montana DEQ identifies soil gas vapor probes as an initial step in a vapor intrusion investigation if the lateral and vertical distances from soil or groundwater hydrocarbon impacts indicate a need for investigation. This assessment indicated that the Eureka Town Hall structure is at distances less than 8 vertical feet from dissolved phase groundwater impacts and necessitates additional iterative investigation of vapor intrusion risks. Near-structure soil vapor points are commonly installed outside a structure to evaluate soil vapor and assess if additional sub slab or indoor air sampling is necessary. Up to three soil vapor points will be installed to assess the potential for petroleum vapors to enter the structure. These points will be installed using EPS Supply dedicated stainless steel soil vapor points. The permanent vapor point will be implanted 5 feet below grade if groundwater at the implant location is not anticipated to reach the screen interval on the vapor point. At locations where groundwater is expected to be less than 5 feet below ground surface during the year, the vapor point will be screened at a depth 6 inches above the anticipated maximum elevation of groundwater. If this gap is anticipated to be less than 3 feet below ground surface WCEC will contact DEQ to discuss installation and design of the soil vapor points. These soil vapor points will be connected to the surface via polyethylene tubing. Glass beads (60-120 mesh) will be placed around the stainless-steel vapor points. The polyethylene tubing will terminate in a 4-inch manhole that is placed in concrete. The void space surrounding the tubing will be filled with bentonite and hydrated to ensure that vapors cannot travel down the probe boring. Soil vapor points will be sampled during the initial soil boring and monitoring well investigation event. These points will be allowed to stabilize for a minimum of 30 minutes prior to sampling. Vapor points will be installed on the south, east and west sides of the Town Hall building.

6.2 Soil Vapor Point Sampling

Soil vapor points will be used to assess the potential for petroleum vapors to enter the structure based on the MVIG. Soil vapor points will be sampled following installation and during the Fall semiannual groundwater sampling event.

To verify the integrity of the seal on the soil vapor points, helium gas will be used as a gaseous tracer in accordance with the Montana Vapor Intrusion Guide (MVIG). Helium gas will be pumped into a shroud placed around the manhole to achieve a minimum concentration of 20% helium gas measured with field instruments. The vapor point will then be purged by removing a minimum of three times the calculated volume of the tubing and vapor sampling point. Following the purging of air from the sample point, a helium gas measurement will be collected by directly attaching the field instrument to the tubing, to ensure that the tubing shows less than 10% of the helium concentration recorded in the shroud.

Air samples will be collected from the soil vapor sampling points using summa canisters without flow regulators. Due to the lack of a flow regulator, the number of compression fitting is reduced to one, making the use of shut in test not possible. As required by the MVIG, WCEC will analyze the summa canisters using EPA method TO-15 and APH. ALS Laboratory in Simi, California will be used to conduct the laboratory analysis of the summa canister samples.

7.0 Reporting

7.1 Data Validation

WCEC will complete the MTDEQ – Waste Management and Remediation Division Data Validation Summary Form for all laboratory analytical reports. The complete laboratory analytical report and associated DVSF will be included as appendices to each report.

7.2 Soil Boring and Monitoring Well Installation Report

The Soil Boring and Monitoring Well Investigation Report will document the additional investigation activities conducted to evaluate downgradient soil and groundwater impacts. The report will document boring locations, drilling methods, sampling procedures, soil lithology, and laboratory analytical results. Cumulative soil and groundwater analytical data tables will be included in the soil boring and groundwater monitoring report. Soil boring and monitoring well logs will detail borehole lithology, drilling method, and total boring depth. Photo ionization (PID) readings and sample depths will also be included on the well logs. Monitoring well construction, well dimensions, and depth of screened intervals will be included for all monitoring, vapor extraction, and air sparge wells. Soil vapor point construction, vapor intrusion assessment, analytical air sample analysis, and recommendation for additional vapor intrusion sampling will be based on this event. The location of all soil boring, monitoring wells and vapor points will be presented overlain on orthophoto imagery. An isoconcentration map for benzene in soil will be created to depict the extent of soil impacts underlying the facility. This report will be used to facilitate discussion and any needed adjustments to air sampling protocols and/or additional vapor intrusion sampling related to the Eureka Town Hall structure.

7.3 Soil Vapor Extraction and Air Sparge Pilot Study Report

A soil vapor/ air sparge pilot study report will be submitted following the completion of the pilot study. This report will help assess if this technology is viable for implementation at the site and outline a proposed full-scale system if it is shown that it is viable. The report will detail the radius of influence of both the SVE and AS systems, removal rates of the SVE system during the pilot study, and any logistical issues with installation of a permanent system. Based on these details a recommendation will be made regarding the installation of a permanent system.

This report will also include analytical results from the initial groundwater monitoring event. A detailed summary of site conditions, description of the monitoring well network, sampling procedures, field

measurements, and analytical results with comparison to applicable cleanup standards or risk-based screening levels will be included in this report.

7.3 Groundwater Monitoring Report & Release Closure Plan

A remedial investigation report will be completed following the receipt of the groundwater analytical report from the second semiannual sampling event. The report will detail all actions completed under Corrective Action Plan 35145 at the facility and will discuss the soil boring, monitoring well installation, and groundwater monitoring events. Cumulative data tables will include all new and historical soil and groundwater analytical data associated with the facility. Figures will detail the locations of monitoring wells and buried utilities at the facility. Discussion of soil and groundwater impacts on and down gradient of the site, vapor intrusion, SVE/AS pilot study results will be summarized in the report.

Discussion of items identified in the Release Closure Plan (RCP) and recommendations for future remedial actions will be included in this report. The RCP will be included as an appendix to this final report. Additional appendices will include soil and groundwater analytical reports, groundwater monitoring field data sheets, soil boring and monitoring well installation logs, and data validation summary forms.

8.0 Corrective Action Plan 35145 Estimated Costs

The attached *Estimated Costs for Corrective Action Plan #35145* and *PTRCB Groundwater Monitoring and Sampling Unit Cost Work Sheet* [Appendix A] details anticipated project costs to complete the MTDEQ required scope of work. The scope of work outlined in this work plan will be conducted following approval of the MTDEQ. WCEC tentatively expects remedial actions to be initiated in the spring or early summer 2026, with the initial groundwater monitoring event being conducted within one month following the drilling event.

8.1 Planned Workflow & Cost Explanations

The estimated costs in Appendix A include completion of monitoring well installation and semiannual groundwater monitoring events included in this work plan. WCEC will complete these tasks during 2026. Events and estimated time ranges are anticipated to occur as follows:

Event 1: Soil boring, monitoring well installation, SVE/AS well installation, well development, surveying, soil vapor point installation & sampling (staff – Staff scientist, Driller, & Driller helper (3 staff, 3 vehicles) Initial event will be conducted between May 1 and June 30, 2026

Soil Boring, Monitoring Well Installation, and Soil Vapor Point Installation & Sampling Report

Events 2: Initial Semiannual Groundwater monitoring event (1 staff, 1 vehicle) May 1- June 30th, 2026

Events 3: SVE/AS pilot study (2 Staff, 2 Vehicles) August 15-September 30th, 2026

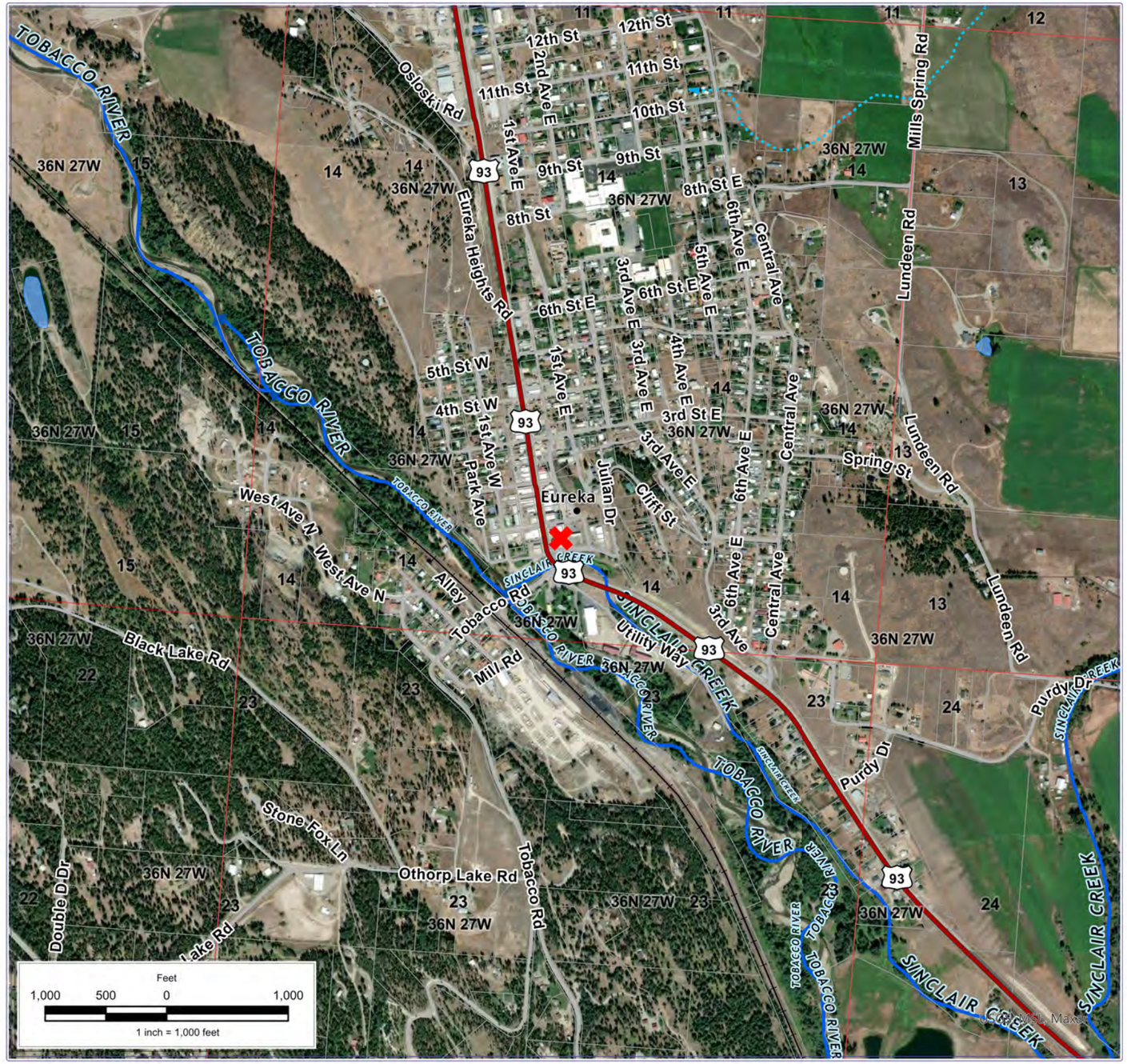
SVE/AS Pilot Study and Initial Groundwater Monitoring Report

Events 4: Second Semiannual Groundwater monitoring and vapor point sampling event (1 staff, 1 vehicle) October 15 – November 30th, 2026

Final Report – Groundwater Monitoring and RCP

This workflow is outlined in sequential order of tasks outlined in this CAP. The attached *PTRCB Groundwater Monitoring and Sampling Unit Cost Worksheet* includes groundwater sampling costs with a corresponding cost total for all remedial action outside groundwater monitoring detailed on the *Estimated Cost Spreadsheet for Corrective Action Plan #35145*.

List of Figures



Site Location

N

Site Location Maps

Town Pump - Eureka
10 Dewey Ave
Eureka, MT 59917

DRAWN BY: NO
DATE: 11/05/24
SCALE: 1:12,000

PROJECT NUMBER: 2410-0538

IMAGE SOURCE: ESRI BASEMAPS

WCEC
ENVIRONMENTAL CONSULTANTS

FIGURE 1

Monitoring Well
M Water
E Electrical
S Sewer
G Gas
UST

SITE DETAILS MAP

Town Pump - Eureka
10 Dewey Ave
Eureka, MT 59917

30 15 0 30 Feet
1 in = 40 ft
Scale: 1:480

N

WCEC
ENVIRONMENTAL CONSULTANTS

JOB NO: 2410-0532	DRAWN BY: DMF
DATE: 7/18/25	IMAGE SOURCE: Maxar

Figure 2

Monitoring Well
All Stop
E Electrical
S Sewer
G Gas
Investigation Layer Test

DOWNGRADIENT SOIL BORING AND MONITORING WELL INSTALLATION AREA MAP

Town Pump - Eureka
10 Dewey Ave
Eureka, MT 59917

30 15 0 30 Feet
1 in = 73.24219 ft
Scale: 1:879

N

WCEC ENVIRONMENTAL CONSULTANTS

JOB NO: 2410-0532	DRAWN BY: DMF
DATE: 2/18/26	IMAGE SOURCE: Maxar

Figure 3

Conservation Easements
OwnerParcel
G Gas
S Sewer
E Electrical
M Water

SVE/AS Pilot Study Map

Town Pump - Eureka
10 Dewey Ave
Eureka, MT 59917

10 5 0 10 Feet
1 in = 10 ft
Scale: 1:120

N

WCEC
ENVIRONMENTAL CONSULTANTS

JOB NO: 2602-0517	DRAWN BY: NO
DATE: 02/18/26	IMAGE SOURCE: Google Earth

Figure 4

Vapor Point Areas
Monitoring Well
G Gas
S Sewer
E Electrical
M Water

Vapor Point Installation Areas

Town Pump - Eureka
10 Dewey Ave
Eureka, MT 59917

20 10 0 20 Feet
1 in = 20 ft
Scale: 1:240

N

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JOB NO: 2410-0532	DRAWN BY: NO
DATE: 04/01/26	IMAGE SOURCE: Google

Figure 5