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A Full Service Environmental Company

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Eric Krueger
Environmental Project Officer
Department of Environmental Quality
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Mr. Brit Miller
Blue Basket Markets Billings
PO Box 531
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Re: Cleanup Work Plan. Excavation and Soil Removal at the Blue Basket #4, 1035 Reeves Road, Bozeman, Gallatin County, Montana; Facility ID 16-13115 (TID 21812), Petroleum Release 6694, Work Plan 35138

Executive Summary

Per Montana Department of Environmental Quality (DEQ) Project Manager Eric Krueger letter sent on January 15, 2026, AJM Incorporated (AJM) has completed the following cleanup work plan (CWP) to remove the petroleum hydrocarbon impacted soils during the fuel system upgrades at the Blue Basket #4, located at 1035 Reeves Road, Bozeman, MT (see Figure 2 Appendix A). This CWP illustrates the excavation activity, sampling procedures, and the necessary reporting. Based on previous information collected at this location during dispenser sump testing and subsequent soil samples which showed impacts, AJM proposes soil excavation to remove the localized impacted soils.

Facility Summary and Current Conditions

During a sump test in March 2025(pre-energy act), the DEQ-UST program requested that a soils sample be collected near the dispenser island. In May 2025, a soil sample was collected below the sump and impacts of Total Extractable Hydrocarbons (TPH) C11-C22 Aromatics were found at 1810 mg/kg. Due to these impacts being above action levels, the site has had 4 monitoring wells installed in December 2025. Currently no groundwater impacts have been found. The Facility is scheduled to have all fuel systems (tanks, pipe, monitoring systems) replaced in early 2026. During that time, any soil impacts found will be stockpiled, samples and taken to the Logan Landfill under an approved profile.

Objectives of Cleanup Work Plan (CWP)

The purpose of this CWP is to illustrate the necessary tasks to complete the remedial efforts at the Blue Basket #4. Although petroleum hydrocarbon impacted soils near the above mentioned dispensers and piping are the main concern, potential historical impacts may also be removed as appropriate.

Cleanup Method Chosen

The most appropriate remediation for release 6694 will be to conduct an impacted soil excavation during the facility upgrade scheduled for spring 2026. During the remediation, clean material can removed from above the impacted soils depths and stored onsite before backfilling the excavation. The impacted soil will be stockpiled if volatile organic compound (VOC) measurements exceed 50ppm during a heated headspace test using a photoionization detector (PID). Stockpiled soil will be placed on plastic sheeting

and sampled for volatile petroleum hydrocarbons (VPH), extractable petroleum hydrocarbons (EPH) and RCRA metals prior to being discarded at the local landfill under an approved waste tracking profile. Site soils are a mix of silty clay to approximately 9ft below ground surface (bgs) with cobbles and sandy silt from 9ft bgs to groundwater at 14ft bgs.

AJM plans to identify impacted soil during the system upgrades under the existing dispensers and undergrounds storage tanks (USTs). If impacted soil is observed, it will be excavate to a depth that exposes clean soil that do not show evidence of hydrocarbon impact and measure below 50ppm VOCs via PID heated headspace test. It is expected that each dispenser (4 islands) excavation will have between 10-30 yards of soil removed and to a depth no more than 10ft. Within the UST basin area, any impacts will be removed down to the water table, approximately 14ft bgs. It is not expected to remove more than approximately 50 yards of impacts at this area (see Figure 2 for approximate excavation areas). It is anticipated that up-to 200 cubic yards of soil can be removed from the site as part of this remedial action plan. In the event that the excavation cannot removal all impacted soils, AJM will contact the DEQ to discuss additional excavation options.

Cleanup Work Plan Tasks (Minimum)

Per discussions with the O/O, responsible party, and Montana DEQ project Manager, AJM has determined that a localized excavation and disposal of impacted soils will be the most environmentally effective and cost efficient remedial solution. The minimum tasks to complete this work include budget planning, subcontractor bid solicitation, soil sampling and analysis, excavation, proper disposal, appropriate discussion, and reporting.

Prior to the completion of the cleanup, this CWP must be approved by the DEQ project manager. Following this approval, coordination with the excavation subcontractor will be completed and local public utilities will be identified using Montana 811. AJM anticipates there may be some removal of asphalt or concrete if the area for excavation is larger than the new system footprint

At this time, backfill will have a compaction rate approximately 95% per the subcontractors estimates. Should a 98% compaction be required, additional charges would be needed and a Form 8 would need to be completed for the PTRCB funding. All soils will be disposed of at the Logan Landfill in Logan, MT with prior approval from the landfill manager and waste tracking form.

Soil under the dispenser islands and in the UST basin will be evaluated during the spring 2026 system upgrade. Impacted soil will be excavated and placed on plastic sheeting to reduce any leaching from the stockpile while it awaits proper disposal. The impacted locations will be excavated until there are no field indicators that support petroleum hydrocarbon impacts including odors, visual impact and heated headspace samples reading less than 50ppm VOCs measured using a PID.

Soil confirmation samples will be collected from the excavation floor and from the sidewalls of the dispenser and UST excavations following DEQ quality assurance project plan (QAPP) and the DEQ Enforcement Program soil sampling guidance document (Appendix B). This will include at least one floor sample and four sidewall samples per dispenser area, unless more sampling is necessary based on the excavation area final dimensions. When collecting confirmation samples on the excavation floor, one composite sample will be collected and analyzed for EPH and two discrete samples will be analyzed for VPH. When collecting sidewall samples, EPH composite samples will be collected every 25 linear feet and discrete VPH samples will be collected from each cardinal direction of the excavation. Excavated dispenser locations are expected to be 10ft x 10ft areas and UST excavation will be localized depending

on the observed impacted soil in the UST basin. All samples will be analyzed by an accredited laboratory for EPH and VPH.

Cleanup Method Pilot Test

This cleanup method does not require a pilot test. The removal of the UST system provided information on the extent and magnitude of the current impacted soils.

Recurring Operation/Maintenance Reports

No additional operation or maintenance will be necessary following the excavation and disposal of the impacted soils.

Scheduling and Reporting

One Cleanup Report (Report) will be completed following the standardized DEQ guidance document found on the dropdown on the Petroleum Tank Cleanup Section (PTCS) webpage. This Report will include the following:

- Discussion of the monitoring method results, deviations from the approved work plan, recommendations, and conclusions.
- Cumulative soil data.
- Site features and potentiometric surface maps.
- Create a Release Closure Plan (RCP) based on the site data collected.
- Submit WP and reports electronically following the PTCS requirements.
- Validate all laboratory data using the DEQs Data Validation Summary Form.

A cost estimate for the above-described work plan can be found in Appendix B. Work the Blue Basket #4 can begin upon written approval by the DEQ. Please do not hesitate to call if there are any questions or if we can provide any additional information.

Sincerely,

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Appendix A
Figure 1-Site Map
Figure-2 Estimated Area of Excavations

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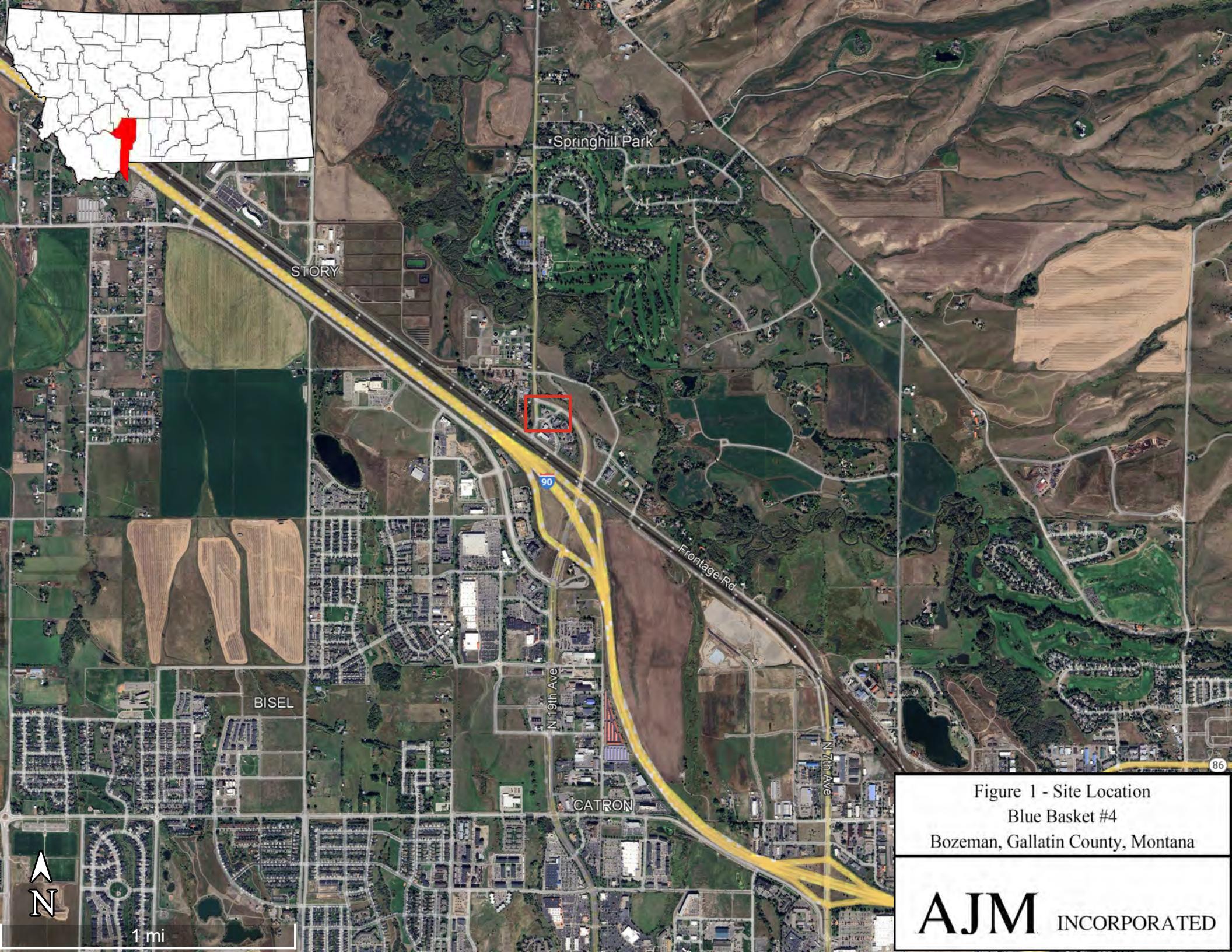


Figure 1 - Site Location
Blue Basket #4
Bozeman, Gallatin County, Montana

