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October 13, 2025
Revised October 21, 2025

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Petroleum Tank Cleanup Section
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Mr. Brit Miller
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**RE: Work Plan Requested to Investigate Petroleum-Contaminated Media at the Blue Basket #4,
1035 Reeves Road, Bozeman, Gallatin County, Montana.
Facility ID 16-13115 (TID 21812), Petroleum Release 6694, Work Plan 35096**

Mr. Krueger,

Per Montana Department of Environmental Quality DEQ work plan request dated September 16, 2025, AJM Incorporated (AJM) has completed the following work plan to conduct groundwater monitoring well installation, development, and sampling at the Blue Basket #4 located at 1035 Reeves Road, Bozeman MT 59718. The purpose of this investigation is to determine the extent and magnitude of the petroleum impacts reported under the June 11, 2025 30 Day Leak Report.

BACKGROUND

During a routine oversight inspection by the Montana DEQ, diesel fuel was found to be contained in the fiberglass sump below dispensers 3/4. The DEQ asked the owner to have a hydrostatic test performed. This was done by Energy system and showed that the sump was not liquid tight due to an "entry boot" around an electrical conduit penetration into the sump (typical entry boot for this age system). Due to these results the DEQ required the owner to have the boot fixed and have soil samples collected from near/below the sump.

Energy Systems cut out concrete next to the sump for boot repair and collected three (3) soil samples near and under the sump 3/4 being repaired. Soil samples show diesel range impacts only slightly above Risk Based Screening Levels (RBSLs) for leaching to groundwater from 10-20 feet below sample collection point in the C11-C22 Aromatic range in sample "18 inches under sump". Results show Aromatics at 1810 mg/kg. The suspect release was reported on April 4, 2025 followed by the Release confirmation on May 30, 2025 after soil samples were collected around dispenser sump 3/4.

Currently the facility has 3 underground storage tanks (USTs) with the following capacities and products: Tank #456 - 10,000gallon gasoline, Tank #457 – 10,000gallon gasoline, Tank #458 – 10,000gallon diesel. All tanks were installed in April 1993.

OBJECTIVES OF INVESTIGATION

The purpose of this investigation is to determine the extent and magnitude of impacts in the soil and groundwater at this facility by collecting soil and groundwater data from upgradient, side gradient, downgradient, and near the release

MINIMUM WORK PLAN TASKS

The minimum tasks to complete this work include site utility identification, compiling site historical documentations, and observe possible environmental receptors and migration pathways. Currently the property operates with three USTs and four dispenser islands. A private locate will be conducted to identify all known utilities prior to drilling and utilities will be included on a new site survey.

On site, the environmental investigation will include groundwater monitoring well construction, soil sample collection from monitoring well cores, and well development. Following the initial site work, groundwater samples will be collected quarterly for the first year, a new site survey will be generated, and all necessary reporting will be submitted to the DEQ under a Remedial Investigation Report.

TASK I – SOIL SAMPLE COLLECTION

Up to 8 soil samples will be collected from the five monitoring well construction soil borings. These samples will be collected from any depth the shows evidence of petroleum hydrocarbon impact and another sample will be collected at the soil water interface, estimated to be around 12ft below ground surface (bgs). In field testing will be conducted using a photoionization detector (PID) and heated head space to measure volatile organic compounds (VOC). If soil cores show less than 50ppm VOCs via PID and no visual or olfactory evidence of impact, then only a soil water interface sample will be collected. Field data sheets will be collected illustrating soil characteristics, textures, petroleum observations, and locations and submitted to DEQ in the report. Documentation will follow standardized guidance outlined by the Unified Soil Classification System (USCS). The driller will upload all monitoring well records to Montana Groundwater Information Center (GWIC), official logs will be included in the DEQ report. This soil data, in combination with the soil data collected during the 2025 dispenser repair, will be sufficient in determining the extent of soil impact.

Soil cuttings will be generated by the use of auger tooling so all soil cuttings will be stored onsite in 55-gallon open top drums to await proper disposal following a composite soil sample and laboratory analysis. Soil cuttings will be disposed of at the local landfill under an approve waste tracking form.

Soil samples will be immediately cooled on ice and sent to an accredited laboratory for analysis of volatile petroleum hydrocarbons (VPH), extractable petroleum hydrocarbons (EPH), EPH fractionation without PAHs, lead scavengers, and one TCLP metals sample for landfill evaluation. Soil EPH fractionation will be conducted if total extractable hydrocarbons exceeds 200mg/kg. One soil duplicate and one field blank may be collected and analyzed EPH/VPH. All soil analytical data will recorded following Montana DEQ guidelines and submitted in the final report.

TASK II – MONITORING WELL CONSTRUCTION

AJM proposes installing four 2 inch monitoring wells to approximately 20-25ft below ground surface (bgs). Flush threaded schedule 40 PVC 0.02 slot wells will be screened from 5-25ft bgs and solid casing

to be installed from 5ft bgs to grade. 10/20 silica sand pack will be used from the total depth to 3ft bgs, then hydrated bentonite from 4ft bgs to 2-foot bgs, and a flush mounted 8 inch monitoring well box. See Figure 2 for proposed monitoring well installation locations. In general, the wells placed will collect data representing upgradient, side gradient, downgradient, and source impacts.

The expected groundwater depth is estimated to be approximately 12-18ft bgs and flows in a northerly direction toward the East Gallatin River approximately ¼ miles to the north.

A Professional Land Survey (PLS) company will be contracted to conduct a survey of the area and tie-in well head elevations into a local USGS benchmark. Street curbs along with both underground and overhead utilities and buildings will also be incorporated into the PLS work. This will provide AJM with A-CAD figures so that groundwater flow direction and gradient can be calculated along with potential future work at the facility and prevent damage to underground utilities.

Monitoring Well Development

Monitoring wells will be developed after well construction to purge silt and sediment ensuring a viable sample can be sent to an accredited laboratory. A two-stage downhole pump and 3/8-inch tubing will be used to purge excess sediment from the wells after installation. This will include surging the tubing and removing both water and silt from the 2-inch diameter wells until water flow has cleared to less than 10 Nephelometric Turbidity Units (NTU). All purge water will be disposed following DEQ Guidance found under the 2015 Disposal of Untreated Purge Water from Monitoring Wells document (Attached in Appendix C). This may include storing the purged water onsite until laboratory data determines the petroleum hydrocarbon concentrations and following discussions with the DEQ project manager. Groundwater sampling may occur no sooner than 72 hours after well development.

TASK III - GROUNDWATER SAMPLING

Groundwater samples will be collected from newly construction monitoring wells quarterly for the first year. During well purging, stabilization parameters will be collected including temperature, pH, dissolved oxygen, conductivity, turbidity and ORP. Once the above parameters are within 10% of previous readings, ± 0.1 units for pH, $\pm 3\%$ for specific conductivity, and $\pm 10\text{mV}$ range for ORP a sample will be collected. All sampling will be conducted per AJM's Quality Assurance Project Plan along with the established MDEQ Quality Assurance Plan (QAP). One duplicate and field blank may be collected per DEQ guidelines per event. Sampling order will be determined based on previous well contamination moving from least known concentrations to higher concentrations.

All non-well specific equipment will be washed with Alconox and triple rinsed prior to sampling a subsequent well. Standard HDPE ¼ inch tubing will be installed into the monitoring wells and a low flow (less than 300mL/min) peristaltic pump will be used to collect groundwater samples. Appropriate labeling, cooling, and chain of custody protocols will be followed. Samples will be delivered under chain of custody to an accredited laboratory for analysis of VPH, EPH, and lead scavengers, using appropriate DEQ and Environmental Protection Agency (EPA) methodology. EPH fractionation without PAHs will be conducted if total extractable concentrations exceed 1000µg/L. Intrinsic Biological Indicators (IBI) will be analyzed during the first groundwater sampling event. This will serve to further identify the aquifer should bio-augmentation be considered as a remedial option. All water produced from this sampling process will follow the same guidance mentioned under monitoring well development. If approved by DEQ project manager and laboratory data permitting, purge water will be disposed of onsite to evaporate on a nonporous surface.

SCHEDULE AND REPORT WRITING

After the final groundwater monitoring event, one Remedial Investigation 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:

- Components of a Well Installation Report and Groundwater Monitoring Report.
- All laboratory results and data validation summary forms.
- Discussion of the monitoring method results, deviations from the approved work plan, recommendations, and conclusions.
- Baseline groundwater data tables.
- Include a receptor survey.
- Updated soil analytical summary sheet.
- Submit WP and reports electronically following the PTCS requirements.
- Validate all laboratory data using the DEQs DVFS.
- Create and submit a release closure plan (RCP)

A cost estimate for the above-described work and can be found in Appendix B. Work the Blue Basket can begin upon written approval by the DEQ. This project is predicted to begin fall 2025 and conclude after submitting the final Report following the last groundwater sampling round, projected to be in spring 2027. Please contact if there are any questions or if we can provide any additional information.

Sincerely,

Lars Heinstedt

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Blue Basket #4

Facility ID 16-13115 (TID 21812), Petroleum Release 6694, Work Plan 35096

October 2025

Appendix A
Site Location
Site Map

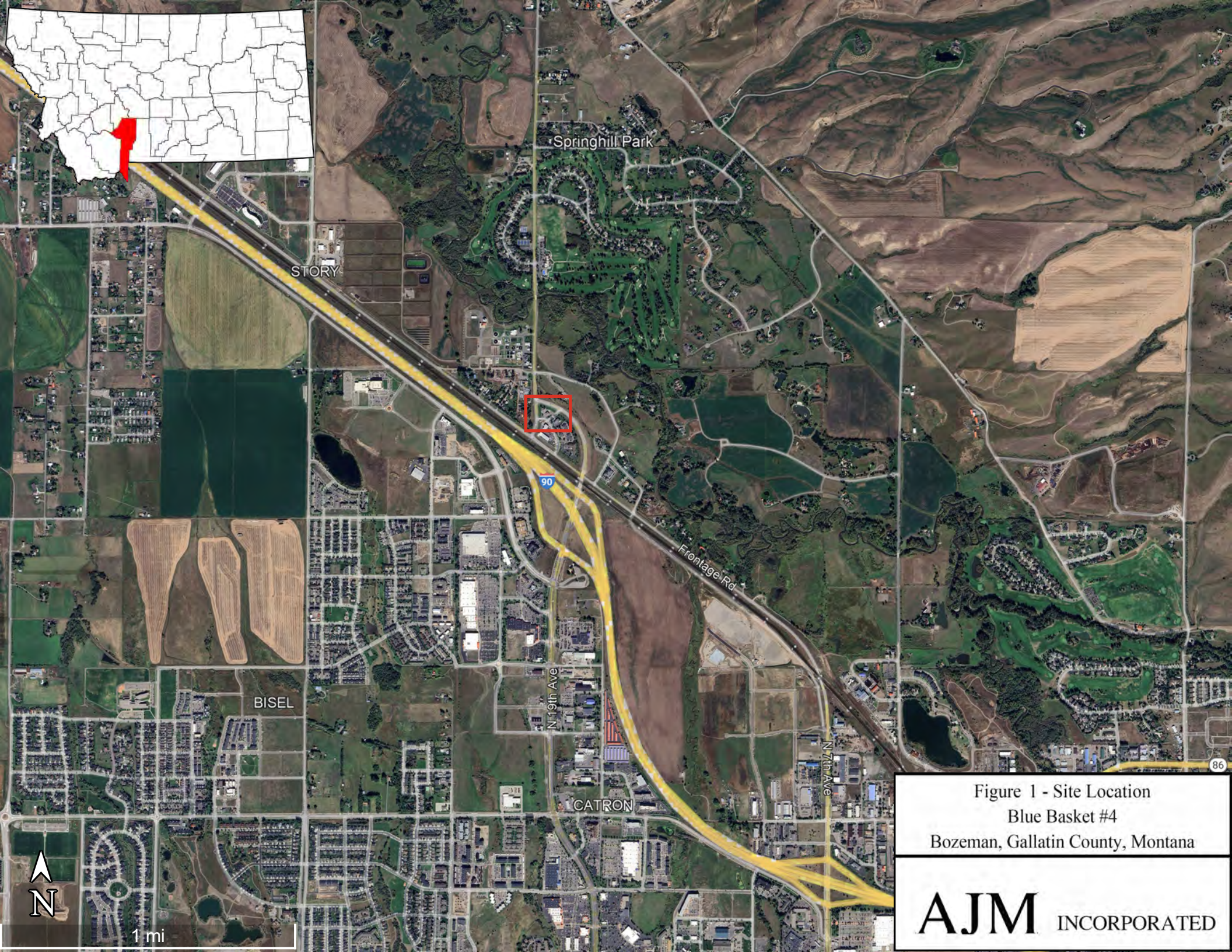


Figure 1 - Site Location
Blue Basket #4
Bozeman, Gallatin County, Montana

