Resource Technologies, Inc.

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April 8, 2026

Mr. Jay Shearer
MDEQ-PTCS
P. O. Box 200901
Helena, MT 59620-0901

Subject: Work Plan for Excavation of Petroleum-Contaminated Soil at the Air Controls Billings Property, 2109 1st Ave North, Billings, Yellowstone County, Montana; Facility ID 00-32601 (TID 32601); Release 6739; Work Plan 35168

Responsible Party: Air Controls, Inc
2115 2nd Avenue North
Billings, MT 59101

Contact: Chris Schaff
(406) 690-3513
chris@aircontrols.com

Dear Mr. Shearer:

On behalf of Chris Scaff, Resource Technologies, Inc. (RTI) is submitting the following Work Plan (WP) and budget for soil excavation at the former Air Controls, Inc. property located at 2109 1st Ave North, Billings, Montana. Proposed activities are intended to remove contaminated vadose-zone soil associated with Release 6739 that was discovered when three underground storage tanks (USTs) were found on site during construction activities. This WP was prepared pursuant to the Montana Department of Environmental Quality-Petroleum Tank Cleanup Section (MDEQ-PTS) letter to Chris Schaff dated March 25, 2026.

BACKGROUND

The Air Controls, Inc. site, located at 2109 1st Ave North, Billings, Montana (the Facility, Figure 1), has a history of commercial and industrial use, as documented in the Phase I and II Environmental Site Assessments (ESAs) conducted by NewFields (2015) and GEM (2023). In 1912, the property was used as a lumber yard associated with the property to the west. Around 1948, the property was developed as a gasoline service

station. Historical aerial imagery indicates that the gasoline service station operated through at least 1975, with six aboveground storage tanks (ASTs), three underground storage tanks (USTs) documented along the southeast and northeast property lines, and a small station building located on the central portion of the site (Figure 2). The ESAs did not confirm the presence of USTs but noted the potential for their presence.

Release 6739:

Release 6739 was discovered on July 9, 2025, when petroleum-stained soil was observed at the edge of an underground storage tank (UST) found during construction at the Facility. On July 10, 2025, a test pit was excavated adjacent to the found tank and a soil sample (AC-1-7) was collected at a depth of seven feet below ground surface. The sample was analyzed for Volatile petroleum Hydrocarbons (VPH) and Extractable Petroleum Hydrocarbons (EPH).

The sample exhibited detectable concentrations of ethylbenzene, VPH aliphatic and aromatic compounds, and Total Extractable Hydrocarbons (TEH), and the sample exhibited concentrations of C9-C10 aromatics, C5-C8 aliphatics, and C9-C12 aliphatics that exceeded the Montana Department of Environmental Quality (DEQ) Petroleum-Release Confirmation Risked-Based Screening Levels (RBSLs) for soil (Table 1 in Montana Risk-Based Corrective Action Guidance for Petroleum Releases, February, 2024) confirming Release 6739.

On July 21, 2025, Marketing Specialties, Inc. removed the three found USTs and collected confirmation soil samples beneath each end of each UST (six samples total). Several samples exhibited RBSL exceedances (leaching to groundwater 0-10 feet) for ethylbenzene, naphthalene, C5-C8 aliphatics, C9-C10 aromatics, and C11-C22 aromatics.

On February 10 and 11, 2026, RTI completed remedial investigation activities which included 16 soil borings to 25 feet bgs on a 20-foot grid pattern extending north and west from the southeast corner of the property. An additional 4 soil boring were placed in areas of interest identified during emplacement of the first 16 borings. Four soil borings were completed as groundwater monitoring wells. Forty-seven soil samples were collected during soil boring activities. None of the samples had any exceedances for MBTEXN compounds. Of the 47 samples, 11 exceeded the RBSL for C9-C10 Aromatics, 8 exceeded the RBSL for C5-C8 Aliphatics, and 5 exceeded the RBSL for C11-C22.

Most soil boreholes showed evidence (odors and or staining) at depths between nine and 12 feet and these impacts appeared to lie within the zone of groundwater fluctuation. Three boreholes, MW-2, SB-4/MW-4, and MW-17 exhibited soil impacts that extended to much shallower depths within the vadose zone.

Following soil boring and well installation and development, a groundwater monitoring event was completed on March 8, 2026. Groundwater samples were collected and analyzed for VPH, EPH and for the lead scavengers 1,2 dichloroethane (1,2 DCA) and ethylene dibromide analytes. The only RBSL exceedance was in MW-1, where C5-C8 Aliphatics was reported at a concentration of 990 micrograms per liter µg/L.

SCOPE OF WORK

The objective of the soil excavation is to remove contaminated vadose-zone soil so the property owner may proceed with planned construction on the site. Proposed work tasks include:

- Complete an elevation survey of all existing monitoring well and borehole location;
- Abandon monitoring wells MW-2 and MW-4 prior to excavation;
- Excavate approximately 400 cubic yards of hydrocarbon contaminated material from two areas: one 20’ x 20’ x 9’ area, and one 20 x 40’ x 9’ area;
- Collect confirmation soil samples at the excavation limits and analyze for Volatile Petroleum Hydrocarbons (VPH) and Extractable Petroleum Hydrocarbons (EPH);
- Transport and disposal of the excavated hydrocarbon contaminated material to the Billings landfill; and
- Backfill the excavation areas with pit run fill and compact.

Work tasks are described in the following sections.

Project Management

RTI will manage and coordinate all aspects of the project including planning, collection of samples, analysis of data, and reporting. Work plan tasks and laboratory reports will be discussed with DEQ’s project manager; agreed upon work plan modifications will be submitted in writing as required to complete the work plan objectives.

RTI will update the site-specific Health & Safety Plan for the planned field activities. A work zone is already established with fencing around excavation areas to reroute traffic and provide pedestrian control.

Elevation Survey

During preliminary construction activities conducted at the site prior to UST discovery, approximately two feet of soil were stripped from the southwest area of the site. Consequently, the ground surface elevation of soil borings and monitoring wells are approximately two feet below the surrounding grade.

The surface elevations of boreholes and groundwater monitoring wells emplaced in February 2026 will be surveyed, relative to a benchmark to be established at the site, with a surveyor's level and stadia rod so that depths to features encountered in soil boreholes and depths of excavation confirmation samples can be reconciled to the surrounding grade.

Monitoring Well Abandonment

Monitoring wells MW-2 and MW-4 lie in areas to be excavated. Following collection of a second round of groundwater samples and prior to excavation, the wells will be abandoned by a licensed monitoring-well driller.

Soil Excavation

Proposed excavation activities will include removal of up to 400 cubic yards of impacted material to a maximum depth of 9 feet. Two areas will be excavated. The first area is anticipated to have dimensions of 20 feet by 20 feet by nine feet deep, and the second area is anticipated to have dimensions of 20 feet by 40 feet by nine feet deep. See Figure 2. The soil will be excavated and loaded directly into dump trucks for transport to Billings Landfill for disposal. Excavation activities will be guided by visual observations and field screening for volatile organic compounds in soil with a photoionization detector (PID) using standard heated headspace method. If stockpiling of excavated soil is necessary, soil will be stockpiled on, and covered with, plastic sheeting.

Confirmation soil samples will be collected at the limit of excavation from the floor and sidewalls of the final excavation. One sample will be collected for each 625 square feet (ft) of floor (unless the excavation penetrates groundwater) and for each 25 linear feet of excavated sidewall. Because the ground surface within the area to be excavated lies approximately two feet below surrounding grade, samples will be collected at depths intervals of 0 to 8 feet (2 to 10 feet relative to surrounding grade); and greater than 8 feet (greater than 10 feet relative to surrounding grade). Depths in confirmation sample designations will be relative to surrounding grade. Samples shall not straddle these depth intervals.

Soil sampling procedures and decontamination methods are described in the attached Standard Operating Procedures.

Backfilling

The excavation will be backfilled to the pre-excavation level with pit run gravel. Backfill will be emplaced in approximate two-foot lifts and compacted. No surface restoration will be required since additional backfill will be emplaced during subsequent site redevelopment activities. RTI will complete a final inspection following compaction.

Laboratory Analysis

The soil samples will be placed on ice and transported with chain-of-custody documentation to Energy Laboratories for analysis within the specific holding time. The samples will be analyzed for volatile petroleum hydrocarbons (VPH) and extractable petroleum hydrocarbons (EPH). It is assumed three floor samples (one per pit), and 20 sidewall samples (two per sidewall) will be submitted for analysis. Sidewall samples will not include samples for the 0-2 ft interval due to the current surface in the excavation areas being 2 feet below the surrounding grade. The samples collected will represent 2-10 feet and greater than 10 feet below original grade. A total of 23 soil samples will be collected.

Investigation Derived Waste Management

Solid waste including gloves, paper towels, etc. will be disposed of in a municipal solid waste receptacle.

Hydrocarbon-contaminated soil will be collected in trucks and transported to and properly disposed of at the Billings Landfill.

Data Validation

All laboratory data generated under this workplan will be validated using the DEQ Data Validation Summary Form (DVSFs). DVSFs will be appended to reports.

Release Closure Plan

Based on historical and newly collected data, RTI will prepare a Release Closure Plan (RCP) using the DEQ RCP format if site conditions indicate additional monitoring or corrective action is necessary. RTI will discuss the findings of the RCP with the DEQ case manager to facilitate identifying the preferred corrective action for mitigating residual groundwater impacts at the site.

Evaluation and Reporting

Upon completion of soil excavation and receipt of confirmation soil analytical results, RTI will prepare and submit a Cleanup Summary Report that will incorporate data generated under this work plan. The report will include the following:

- Facility map(s) showing site layout, utilities, locations of monitoring wells, and excavation extents;
- Landfill disposal tickets;
- Tabulated summaries of soil analytical data, including soil results collected to date (laboratory analytical results and data validation checklists will be appended to the report); and

- Recommendations for any necessary additional remediation work required to resolve the Release.

Electronic copies of the reports will be submitted to MDEQ and the responsible party.

SCHEDULE

Cleanup efforts listed under this workplan will be scheduled for summer 2026, likely in late June. Under existing Work Plan 35073, the second approved groundwater sampling event will be scheduled to occur directly prior to abandonment of the wells and excavation activities to capture high groundwater and baseline conditions.

BUDGET

A breakdown of costs associated with the cleanup activities is attached. Bids for excavation and backfill were obtained from three contractors. Overtime Enterprises Inc. of Shepherd, Montana provided the low bid. Subcontractor bids are attached. Costs associated with surveying, oversight, soil sampling, laboratory analysis, and reporting with the cleanup are included in the attached cost worksheet. The total cost for cleanup and the associated activities is $137,142.10. If you have any questions or comments regarding this workplan, please do not hesitate to call.

Respectfully Submitted,

Resource Technologies, Inc.

Joe Laudon
Hydrogeologist

Meredith Pepka, EI
Associate Environmental Engineer

Attachments

cc: Chris Schaff

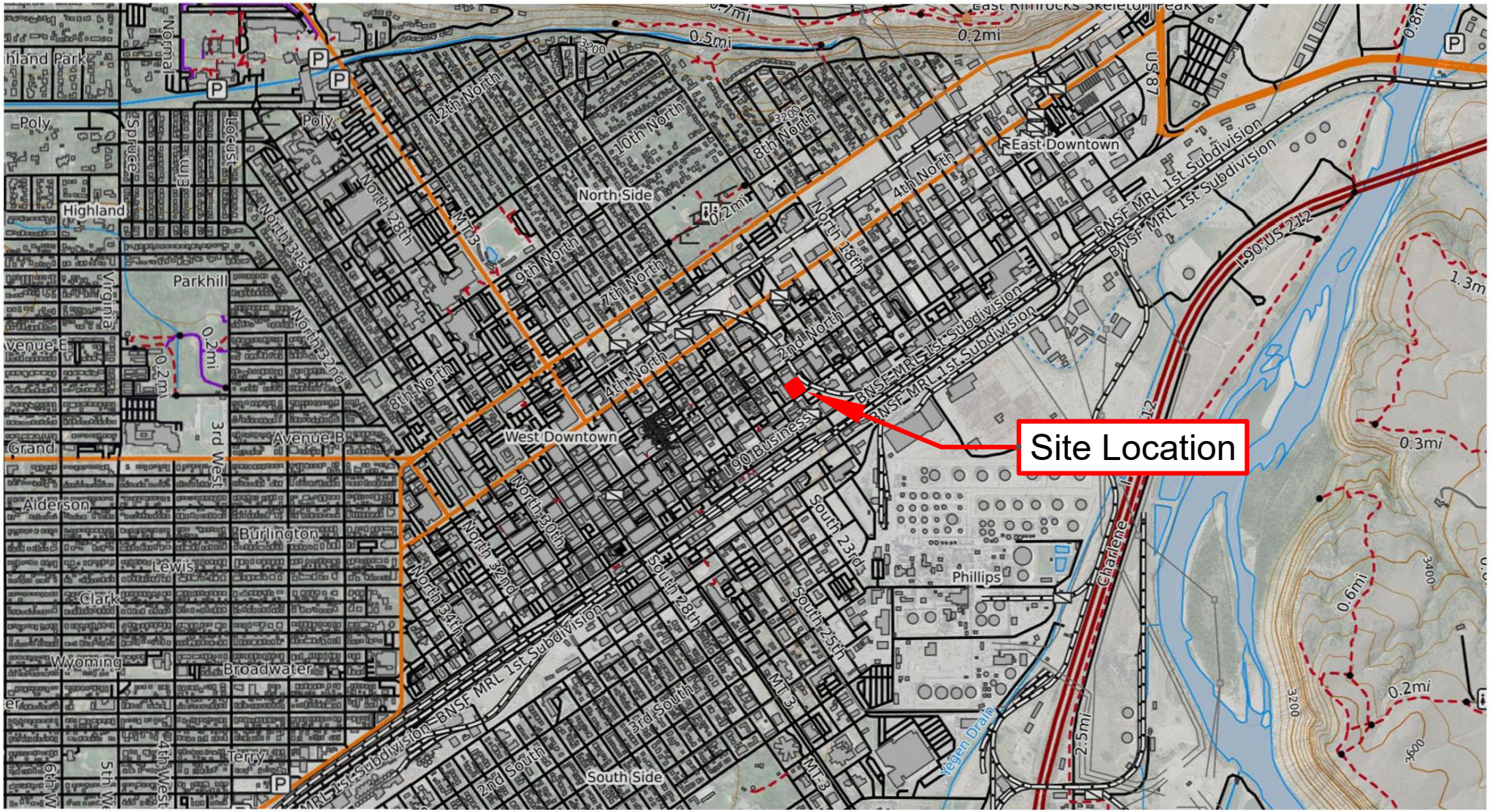
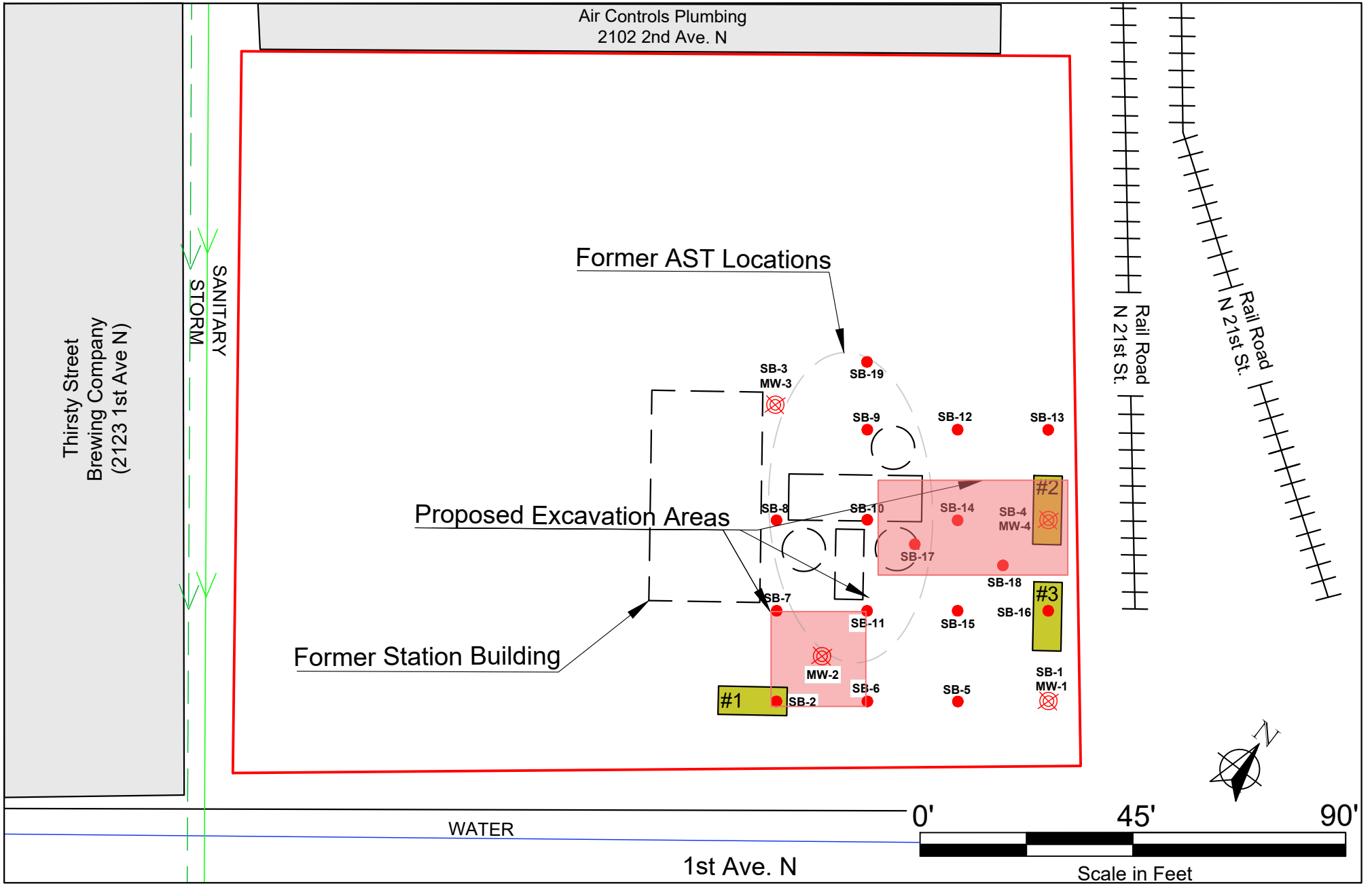


Figure 1

Air Controls UST Release
Site Location Map
Release ID #32601
Facility ID #009-32601
2100 1st Ave N Billings, MT

RESOURCE
TECHNOLOGIES, INC.
1050 EAST MAIN STREET, SUITE 4
BOZEMAN, MT 59715
(406) 585-8005 FAX: (406) 585-0069



Legend

- Found Underground Storage Tanks
- Site Boundary
- Utilities - Storm Drain
- Utilities Sanitary Sewer
- MW-2 — Groundwater Monitoring Wells
- SB-6 — Soil Boring
- Utilities - Water

Note: Property Lines are Approximate

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Figure 2
Proposed Excavation Areas
2100 1st Ave N, Billings, MT