May 18, 2026

Mr. Wade Laubach
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Gardiner, MT 59030

Delivered via email: townstation@outlook.com

Prepared by Brandon Kingsbury
Tetra Tech, Inc.
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SUBJECT: Town Station - Release 6759, Facility ID 34-06531, WPID 35177
RI Work Plan V2
401 Scott Street West, Gardiner, Montana
Tetra Tech Project Number 103PA0364

Dear Mr. Laubach:

Tetra Tech, Inc. (Tetra Tech) is pleased to submit this work plan to conduct a remedial investigation (RI) to investigate the release at Town Station 401 Scott Street West, Gardiner, Park County, Montana (Figure 1). This work plan has been prepared based on a meeting between Tetra Tech and DEQ on April 14, 2026 and in response to a request from Eric Krueger of the Montana Department of Environmental Quality (DEQ) in correspondence dated April 15, 2026 (MDEQ, 2026). In this correspondence, DEQ and Tetra Tech agreed to the following approach:

- *Advance soil borings in the area of previously identified contamination around historical soil boring SB-2 to define the vertical and lateral extent of contamination.*

- *If a vertical profile of apparent contamination suggests leaching to groundwater, then install up to three monitoring wells to assess petroleum impacts to groundwater.*

- *Log soil borings and obtain soil samples as needed to characterize risk to receptors. Sampling will be determined in the field based on visual, olfactory, and PID readings.*

- *Based on soil borings near the sewer line, if contamination is observed within vertical and lateral screening distances of the onsite structure, a soil vapor probe may be completed adjacent to the slab to determine if vapor intrusion is occurring.*

- *Survey the newly installed wells to obtain accurate elevations.*

- *Submit soil samples for laboratory analysis. Have the samples analyzed for volatile petroleum hydrocarbons (VPH), extractable petroleum hydrocarbons, and the lead scavengers 1,2-DCA and EDB using EPA Method 8260B and 8011, respectively.*

- *Perform one round of groundwater monitoring of all newly installed monitoring wells. Gauge fluid levels at all monitoring wells. Collect groundwater samples from all wells currently located at the Facility by low-flow sampling methodology according to DEQ's Groundwater Sampling Guidance found under the Guidance dropdown at the PTCS webpage.*

- *Analyze groundwater samples for petroleum constituents as required by the Montana Risk-Based Corrective Action Guidance for Petroleum Releases (RBCA) (MTDEQ 2024). In addition, have groundwater samples analyzed for the lead scavengers 1,2-DCA and EDB using EPA Method 8260B and EPA Method 8011, respectively.*

- *Dispose of purge water according to the Disposal of Untreated Purge Water from Monitoring Wells flowchart found under the Guidance dropdown at the PTCS webpage*

- *Validate all laboratory analytical data using DEQ's Data Validation Summary Form (DVSF).*

- *If ongoing investigation or cleanup is required, Tetra Tech will prepare a Release Closure Plan (RCP); discuss results with DEQ's project manager.*

- *Prepare and submit one RI Report detailing the results of the investigation.*

The following work plan presents a brief discussion of the site's history and the proposed scope of work to meet the MDEQ request.

FACILITY HISTORY/RELEASE BACKGROUND AND FACILITY CONDITIONS

Conoco Town Station is located at 401 Scott Street West, consists of two (2) contiguous Park County tax lots developed with a Conoco-branded convenience store and retail gas station and a restaurant in the center of Garinder, Montana (Figures 1). The facility is presently owned and operated by Garinder Town Club Inc. (Wade Laubach) and is an active gas station. In current operation are four tanks consisting of two (2) 8,000-gallon gasoline, one (1) 4,000-gallon diesel, and one (1) 4,000- gallon gasoline tank, all of which were installed in 1984. The facility consists of the main store building, an adjacent sandwich shop (Bench Warmers), an underground storage tank (UST) basin, Electric Vehicle Charging station and two rows of dispenser islands. The site is underlain by fill material, sandy silts, silty clays, transitioning to fine-grained sandstone and siltstone of the Gallatin National Forest Area.

A Release was discovered through a Phase II ESA that was completed on the week of March 2, 2026. The Phase II ESA was completed by Carrie Beveridge of GEM Environmental. (GEM 2026) Contamination appears to be from historical spills and/or overfills. On February 7, 2026,

six (6) soil borings at the site were completed, designated B-1 through B-6. Soil boring B-1 was advanced to refusal at 13 feet bgs. Borings B-2 and B-3 were advanced to refusal at 6 feet bgs. Borings B-4 and B-5 were terminated at 5 feet bs. Boring B-6 was advanced to refusal at 7 feet bgs. The borings generally encountered brown and white silty gravel and sand and sandy silt with varying moisture content beneath the ground cover to the depths explored. No groundwater was encountered.

Contaminated soil was encountered in soil boring B-2 with gasoline exceedances of DEQ Tier 1 RBSLs for benzene, C5-C8 aliphatics, C9-C12 aliphatics, and C9-C10 aromatics. Diesel-related contamination was also apparent with exceedances of C9-C18 aliphatics, and C11-C22 aromatics.

The following sections summarize Tetra Tech's proposed scope of work and schedule to complete the requested tasks. The Montana Remedial Investigation Guidance for Petroleum Releases Workplan & Report Preparation Cost Considerations, Groundwater Monitoring and Sampling Unit Cost Worksheets, and the Cost Estimate Breakdown are provided in Attachment A.

WORK PLAN OBJECTIVES

The primary objective of this work plan associated with the proposed remedial investigation is to define the extent and magnitude of petroleum contamination. Specific goals include:

- Conduct a subsurface exploratory investigation in the vicinity of the south end of the fuel pump canopy to determine the lateral and vertical extent of contamination.
- Assess concentrations of VPH, EPH, and lead scavengers to determine the extent and magnitude of contaminants of concern in groundwater. Criteria includes comparing data to risk-based screening levels and human health standards.
- Confirm the presence of any receptors and assess those receptors for potential impacts. If contamination is observed impacting a preferential pathway or is within vertical and lateral screening distances for vapor intrusion into the structure, then soil gas may be evaluated for intrusion risks.
- Close the release based on the data collected as part of this assessment.
- If closure of the release cannot be attained, then Tetra Tech will compile newly collected data and previously collected data and the RCP will be updated with alternatives to bring the release to closure based on effectiveness or reliability, implement ability, safety, effects on public health and the environment, cost, advantages vs disadvantages, and time to completion.

SCOPE OF WORK

This project's general scope of work includes installing five soil borings and as a contingency, three groundwater monitoring wells. After the monitoring well installation, static water levels will be measured, and groundwater samples will be collected from all monitoring wells. A remedial

investigation report (RIR) will be prepared, including completing the Release Closure Plan (RCP), if necessary. The following details describe the methods to be used for this investigation:

SUBSURFACE INVESTIGATION

- Conduct an underground utility locate using the Montana 24-hour Utility Notification Center. A private utility locate will also be employed to locate utilities within the proposed soil boring areas. Once utilities are located, Tetra Tech will map the location of the utilities and provide discussion regarding potential impacts to the utility corridors, if applicable.
- Install up to five soil borings to a maximum depth of 100 feet. Due to subsurface conditions, a Hollow Stem auger will be utilized for borings until refusal or a maximum depth of 40'. If significant contamination is observed at the maximum depth of each auger boring, based on refusal, then additional borings will be completed using air-rotary drilling methods.
- Install up to three monitoring wells to assess petroleum impacts to groundwater. At least one of these wells should be placed in the area of maximum remaining soil contamination as identified during the auger boring assessment. Monitoring wells will only be completed if a vertical profile suggests possible migration to groundwater based on visual, olfactory, and PID readings.
- Log soil borings and obtain soil samples during the installation of the monitoring wells. Soils will be classified using the Unified Soil Classification System by either an environmental engineer, geologist, or environmental scientist. Petroleum impacts will be determined via visual and olfactory observation and measured with a photoionization detector to determine total volatile organic compounds (VOCs) using the heated headspace method. Soil will be considered contaminated if VOC concentrations exceed 50 ppm, however, if concentrations don't exceed 50 ppm, the interval of highest concentration relative to other intervals will be chosen for sampling; some compounds such as diesel fuel may not produce high concentrations of VOCs when read by the PID despite being present in the soil at actionable levels. Samples will be taken accordingly:
    - From surface soils, if contamination is present from 0-2 feet below ground surface to evaluate the direct contact commercial exposure scenario
    - From the area of maximum field measured contamination from 0-10 feet below ground surface to determine direct contact construction risks and leaching risk to groundwater.
    - From the area of maximum field measured contamination at the representative depth of the soil/groundwater interface (if present). This sample will only be collected if necessary to understand the potential for contamination of groundwater via leaching or direct contact with contaminated soil. For example, if petroleum impacts remain shallow, a sample may be collected at a location approximately 20 feet below the contamination, or the bottom of the boring if the boring is terminated at a depth shallower than the soil-groundwater interface to provide a vertical profile to demonstrate whether leaching risk is occurring. On the other hand, if contamination is continuous to the soil-groundwater interface, a sample

may be obtained from the interface and/or zone of highest impacts to inform remedial approaches.

- Based on a review of surrounding topography and well logs, the groundwater flow direction is anticipated to range from the west to the northwest. Therefore, the proposed monitoring well locations are cross-gradient, downgradient, and within the source area (Figure 2) to establish a flow network.
- Install a vapor probe adjacent to the sewer service line for Bench Warmers and near the slab.
- The soil borings will be installed using the hollow-stem auger drilling technique to approximately 40 feet or until competent bedrock is encountered. At that point, the drilling subcontractor will switch over to Odex drilling (air rotary) to achieve a target depth of 100 feet bgs. Exact locations will be determined after an assessment of site-specific access, underground utility locates, and safety. To assess petroleum hydrocarbon impacts, soil borings will be continually logged to a depth of approximately 40 feet below ground surface (bgs) or refusal. Drilling bids are presented in Attachment B.
- Soil samples will be collected from each borehole continuously and logged for soil type, density, moisture content, color, and evidence of petroleum hydrocarbon staining and odor.
- Each sample will be screened for petroleum hydrocarbon impacts using visual and olfactory observations of staining and odor, and standard headspace screening techniques with a photo-ionization detector (PID).
- Up to three soil samples will be collected from each soil boring for laboratory analysis. Each soil sample will be placed in clean laboratory-supplied containers and submitted to Energy Laboratories in Helena, Montana. The soil samples will be analyzed for volatile petroleum hydrocarbons (VPH) and extractable petroleum hydrocarbons (EPH) screen using the Massachusetts Department of Environmental Protection method. Per MTDEQ RBCA guidance, if the EPH concentration in the soil exceeds 200 milligrams per kilogram (mg/Kg), then an EPH fractionation analysis is required (MTDEQ, 2024). For cost-estimating purposes, it will be assumed that four soil samples will also be analyzed for EPH fractionation. Additionally, soil samples will be submitted to the analytical laboratory for 1,2 Dichloroethane using EPA method 8260b and for Ethylene dibromide using EPA method 8011. Per DEQ's data validation guidelines, a QA/QC field duplicate sample will be taken at a frequency of at least one field duplicate per every 20 parent samples or each batch if less than 20 parent samples. Field duplicate sample(s) will be submitted for all analytical methods.
- To evaluate leaching to groundwater, Synthetic Precipitate Leaching Procedure (SPLP) samples may be collected to determine mobility of contaminants through the soil. Soil leachate concentrations will be compared to total VPH and EPH concentrations to determine soil-water partitioning coefficients. From this data, vadose zone travel times will be calculated based on conservative assumptions for infiltration and distance to groundwater.
- Impacted drill cuttings, as identified by field screening via visual signs of petroleum staining, olfactory observations of petroleum impacts, and with a heated-headspace total VOC

concentration in excess of 50 PPM, will be containerized on-site within 55-gallon drums. A soil sample will be collected from the containerized soil and submitted for laboratory analysis of VPH, EPH, and Resource and Conservation and Recovery Act (RCRA) total metals per landfill disposal requirements.

MONITORING WELL INSTALLATION

- If results from field screening above indicate impacted groundwater or a leaching risk to groundwater, then up to three select borings will be completed as groundwater monitoring wells. Wells will be selected based on petroleum impacts and positioned appropriately to triangulate groundwater flow and gradient. Each selected soil boring to be completed as a monitor well will be constructed with two-inch diameter Schedule 40 PVC materials (Figure 2). The well screen piping will be 0.010 slot size well screen and based on GWIC data, will be installed from 85 to approximately 100 feet bgs. A sand pack of 10-20 silica sand will be placed adjacent to the well screen from the total depth of the boring to approximately two feet above the well screen. A threaded cap will be installed on the bottom of the screen casing. Bentonite chips will be placed from the sand pack to approximately one-foot bgs. The monitoring wells will be completed with an eight-inch diameter flush-mount steel protector casing concreted in place. The top of the PVC casings will be fitted with two-inch diameter water-tight locking plugs. The subcontractor bids for monitoring well installation are provided in Attachment B. Monitoring wells will be named MW-1 through MW-3.
- Each monitoring well will be developed using a surge block and water pumping technique. The well will be surged and pumped until the pumped water is sediment free and clear. Development water will be containerized and disposed of in accordance with the *Disposal of Untreated Water from the Monitoring Wells Flow Chart* and disposed of appropriately following receipt of laboratory results (MDEQ, 2015).
- The latitude, longitude, and vertical elevation of each new monitoring well PVC casing will be surveyed by and overseen by a licensed engineer or conducted by a licensed surveyor to an accuracy of 0.01 feet above mean sea level.

GROUNDWATER MONITORING

- As this is the first round of groundwater monitoring with unknown groundwater impacts, groundwater monitoring will be conducted once. If upon analysis, groundwater concentrations are in excess of DEQ RBSLs, or Human Health Standards, an additional event will occur and correspond with seasonally low groundwater during the fall/winter. The groundwater monitoring event is expected to occur during summer of 2026. If groundwater concentrations are not in excess of these screening levels, an additional groundwater monitoring event will still occur during the seasonally low groundwater period to fully confirm that groundwater has not been contaminated by this release. For cost-estimating purposes, it is assumed that three monitoring wells will be sampled with one duplicate. The locations of each well are displayed in Figure 2. It is anticipated that soil borings SB-1, SB-2, and SB-3 will be converted to monitoring wells.
- Depth to groundwater will be measured from each monitoring well using a decontaminated

electronic oil/water interface meter. The meter will be decontaminated between each well measurement using Liquinox® soap solution and clean potable water rinse.

- Groundwater purging and sampling will occur at least 24 hours after installation to allow equilibration with the aquifer. Each monitoring well will be purged with low-flow, slow-purge pumping method using a submersible bladder pump and dedicated polyethylene tubing. During purging, field instruments will analyze the water for pH, temperature, dissolved oxygen, specific conductivity, oxidation-reduction potential, and turbidity. During purging and at each field reading interval (anticipated at every 3 to 5 minutes) water levels will be recorded to assess drawdown. If excessive drawdown (> 0.3 ft of initial groundwater level) is encountered, the well will be allowed to recharge and the purge rate will be adjusted to lower pumping stress on the aquifer. Purge water will be containerized in accordance with the *Disposal of Untreated Water from Monitoring Wells Flow Chart* and disposed of appropriately following receipt of laboratory results (MDEQ, 2015). The pump will be decontaminated between wells using a Liquinox solution followed by a triple rinse technique. Additionally, a new bladder will be installed between each well. Additional information is provided in the low-flow sampling standard operating procedure, provided as an appendix to this work plan.
- A groundwater sample will be collected from each monitoring well using a submersible bladder pump and dedicated polyethylene tubing. One duplicate groundwater sample will also be collected. Groundwater samples will be analyzed for VPH and EPH. In accordance with DEQ guidance, if the EPH concentration in water exceeds 1,000 micrograms per liter (µg/L), then an EPH fractionation analysis is required (MDEQ, 2020). For cost estimating purposes it is assumed that four water samples will be analyzed for EPH fractions.
- Due to the long history of dispensing activities at this location and the potential for historical releases during the leaded gas era, groundwater will be analyzed for lead scavengers. Lead scavenger analysis includes ethylene dibromide (EDB) via EPA method 8011 and 1,2 dichloroethane (DCA) via EPA method 8260. If lead scavengers are not detected during the initial groundwater monitoring event, collection of samples for lead scavengers will be discontinued from the sampling schedule.

VAPOR PROBE INSTALLATION AND SAMPLING

- A near-slab soil vapor probe will be installed, if warranted based on observed contamination based on visual, olfactory, or PID readings in excess of 100 ppm within vertical and lateral screening distances per Montana's Vapor Intrusion Guide (MTDEQ 2021). Per the guidance, if dissolve-phase contamination or impacted soil is encountered within 30 lateral feet of the structure or a greater distance based on a utility corridor providing a preferential pathway, then soil gas vapor intrusion may be an exposure pathway. For the vertical component, if contaminated soil or dissolved-phase contamination is within 8 feet of the structure, then there may also be a risk to soil gas vapor intrusion. Also, if free product is encountered within 15 vertical feet of the structure then there may be vapor intrusion risk. If any of these conditions are met, then a vapor probe boring will be advanced to a maximum depth of 4 feet bgs. This depth is selected to be reflective of a near-slab/sub-slab scenario

and based on the presence of an overlying external concrete slab and the possible presence of underlying utilities.

- As the area adjacent to the structure is overlain with a concrete slab, the vapor probe will be constructed with a discrete sampling interval of 6 inches to be co-located to the sub-slab depth likely at 6 to 18 inches bgs. The vapor probe will be constructed of rigid ¾ inch HDPE pipe coupled to a reducer bushing, which will accommodate a stainless-steel vapor pin. The vapor pin will be sealed within the bushing with Teflon tape and encased with a slotted and threaded 6" length of ¾ inch pipe and 1" outer diameter perforated cap. The discrete sample interval will be encased in glass beads and the overlying interval will be sealed with hydrated bentonite to the ground surface. The surface of the slab around the sealed penetration will be packed with cloth saturated with difluoroethane to test the integrity of the seal.
- The vapor pin will have a dedicated polyethylene sample tube, which will be attached to two 6-liter summa cannisters via rigid sample T at each sample event. A parent sample and duplicate sample will be collected at least 24 hours after installation to allow equilibration with the subsurface environment.
- Soil gas samples will be collected at the time of installation of the vapor pin, and during an additional event during seasonally low groundwater to assess seasonal fluctuations of subsurface conditions. Results of these two sampling events will determine if additional monitoring and sampling will be required. Samples will be sent to Pace Analytical laboratory for analysis via TO-15 SIM and Massachusetts method APH. The lead scavengers EDB and DCA and the tracer difluoroethane (DFA) will be included in the TO-15 analysis. DFA (100% purity) will be used as a tracer as a more cost-effective alternative to helium. The subsurface environment that the soil samples will be collected in consists of loose river gravels and sands with significant pore space that is anticipated to contain substantial amounts of soil vapor, which lowers the likelihood of losing critical gas volume to leaks in surface seals. As discussed in the Interstate Technology Regulatory Council (ITRC) Vapor Intrusion Pathway Guide, a concentration of tracer of 100 ug/m^3 corresponds to a 0.1% leak, assuming a starting concentration equal to the vapor pressure of the compound or a 1% leak if the starting concentration is only 10% of the vapor pressure (ITRC 2007).

DATA VALIDATION

Each analytical data package will include a summary report that cross-references the sample identification with the laboratory identification and identifies variations from standard operating procedures; laboratory analytical results; quality control data, which may include but is not limited to surrogate recoveries, initial and continuing calibration blanks and spikes, method blanks, laboratory control blanks, and spikes, and matrix spike and matrix spike duplicates; FID chromatograms; chain of custody form(s); and a sample receipt checklist.

Additionally, data validation will be included with the investigation report and will follow DEQ's data validation guidelines (MTDEQ 2018) as per: *https//deq.mt.gov/Portals/112/Land/StateSuperfund/Documents/DataValidationReport.pdf*. It is anticipated that up to three separate data validations will need to be completed for this project.

One for soil sampling data and one for the groundwater monitoring event, and one for soil gas analytical, if necessary.

REMEDIAL INVESTIGATION REPORT PREPARATION

Tetra Tech will prepare a RIR presenting findings and conclusions, soil and groundwater investigations, and groundwater monitoring activities. The report will include results from field screening activities, figures depicting site features and well locations, well completion details and logs, a summary of soil sampling results, groundwater elevations, groundwater potentiometric surface map, groundwater flow direction and gradient, a summary of groundwater analytical results, and discussion on the vertical and aerial extent of impacts based on the investigation data. A discussion on impacts to receptors will be provided in the report including impacts to utilities, corridors, wells, indoor air, surface and subsurface soil, and groundwater. Tetra Tech may prepare a RCP, which will be appended to the RIR, to evaluate the potential for closure of the release. The RCP will be updated as needed based on future scopes of work.

SCHEDULE AND BUDGET

Tetra Tech will initiate this work upon receiving authorization from Gardiner Town Club Inc. and approval from the MTDEQ. It is anticipated that work will occur in June of 2026 to coincide with high groundwater and immediately following approval by DEQ and based on availability of the drilling subcontractor. The work described above will be conducted on a unit cost basis per the attached *Montana Remedial Investigation Guidance for Petroleum Releases Workplan & Report Preparation Cost Considerations, Groundwater Monitoring and Sampling Unit Cost Worksheets*, and *Cost Estimate Breakdown* included in Attachment A.

AUTHORIZATION

The work described in this plan will be conducted per the terms and conditions in the Master Services Agreement and Task Order for work plan Release 6759 between Gardiner Town Club Inc. and Tetra Tech, dated May 6, 2026. If you have questions or comments regarding this work plan, don't hesitate to call us at (406) 437-9869. For your convenience, we have forwarded a copy of this work plan to DEQ for their review. We will not begin this work until we have approval from DEQ. We appreciate the opportunity to provide you with environmental consulting services.

Sincerely,

Tetra Tech, Inc.

Brandon Kingsbury, PG
Project Manager

Cc: Wade Laubach – townstation@outlook.com

Enclosures

Figures
Attachment A: Cost Estimates & GWM Worksheet
Attachment B: Drilling Bids
Attachment C: Standard Operating Procedures

REFERENCES

Green Environmental Management, Phase II Environmental Site Assessment, Conoco Town Station, 401 Scott Street W., Gardiner, Park County, Montana 59030, GIEIM Project No. 26-0365, March 13, 2026.

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MTDEQ, 2026. Petroleum Release Section 30-Day Release Report, Facility ID 34-06531, Release 6759, Town Station. April.

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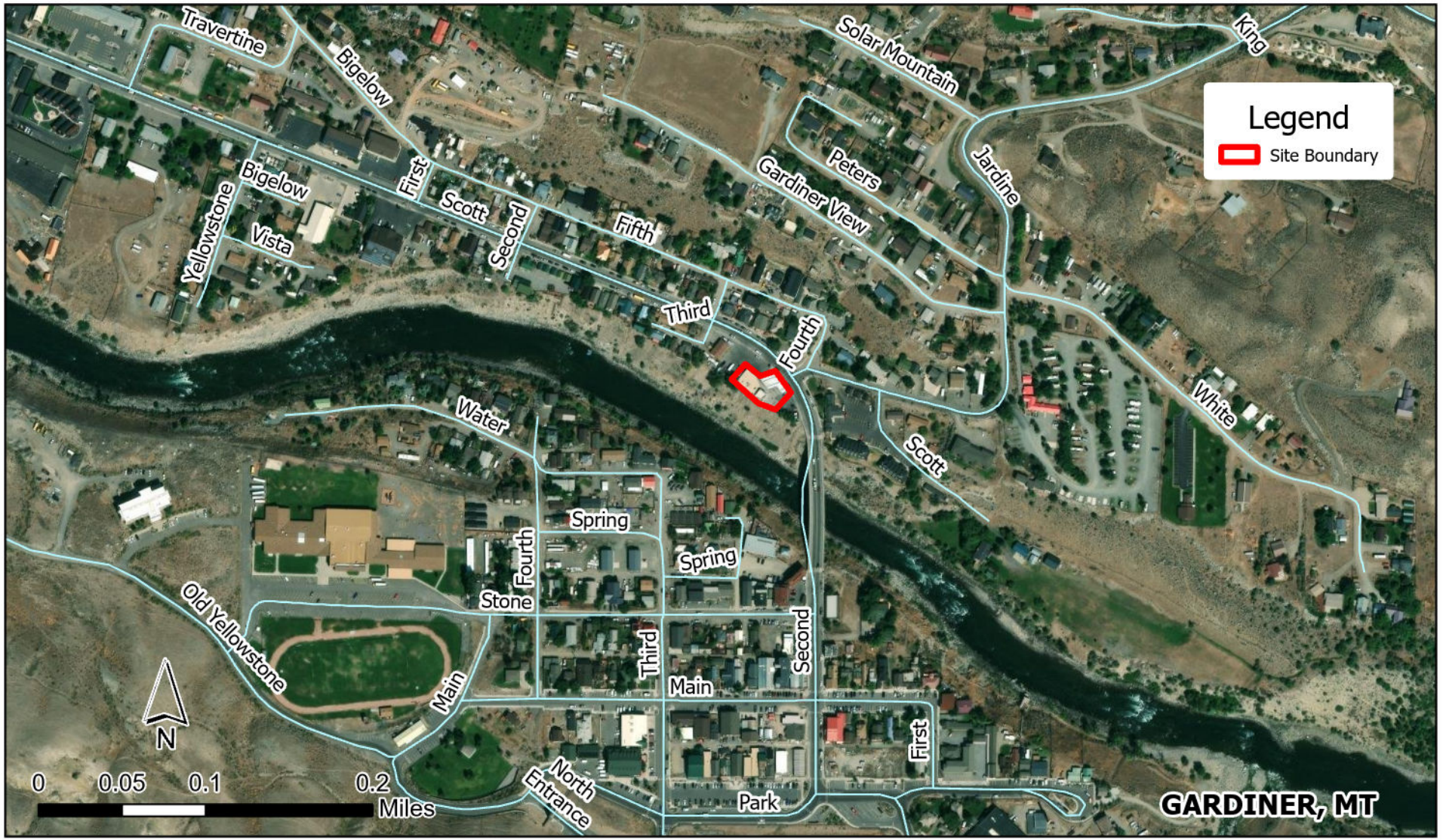
MTDEQ, 2021. Montana Vapor Intrusion Guide. September.

MTDEQ, 2024. Montana Tier 1 Risk-Based Corrective Action Guidance for Petroleum Releases. February.

TETRA TECH

FIGURE



Notes:

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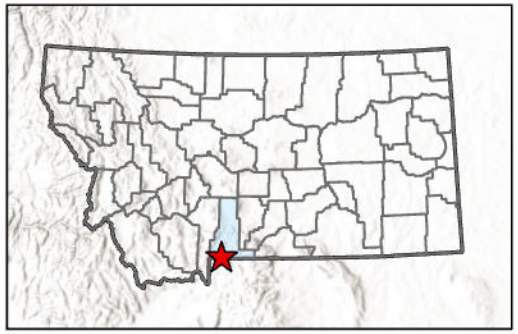

TETRA TECH

Analyst: M. Branson
Date: 5/8/2026

Conoco Town Station
Phase II Environmental Site Assessment

Gardiner, Park County, Montana

Facility ID 34-06531 TID 26030 Release ID 6759

Figure 1
Vicinity Map

Notes:

Service Layer Credits: World Imagery: Microsoft, Vantor
World Hillshade: Esri, USGS

TETRA TECH

Analyst: M. Zilinsky
Date: 5/4/2026

Conoco Town Station
Phase II Environmental Site Assessment
Gardiner, Park County, Montana
Facility ID 34-06531 TID 26030 Release ID 6759
Figure 2
Site Details & Proposed Boring Locations

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