Olympus Technical Services, Inc.

March 12, 2025

Patrick Skibicki
Montana Department of Environmental Quality
Brownfields and Federal Facilities Section
PO Box 200901
Helena, MT 59620-0901

Re: Groundwater Monitoring Work Plan
Former Shortridge Oil Company (aka Krueger Oil Company)
800 Clough Avenue, Columbus, Stillwater County, Montana
Facility ID# 48-05082; Release# 1928; WPID# 28576; Work Plan 35008

Dear Mr. Skibicki:

This letter presents a groundwater monitoring work plan for the Former Shortridge Oil Company (a.k.a. Krueger Oil Company Facility) (Site) located at 800 Clough Avenue, Columbus, Montana as shown on Figure 1. Olympus Technical Services, Inc. (Olympus) has prepared this work plan in response to a Department of Environmental Quality (DEQ) letter issued February 12, 2025, requesting groundwater monitoring at the Site. The DEQ has requested two groundwater monitoring events be conducted at the Site during high and low groundwater conditions. A Location Map and Site Map are provided as Figures 1 & 2. This work plan presents a detailed scope of work and a groundwater monitoring unit cost worksheet for the proposed scope of work.

Scope of Work

Well Redevelopment

Before groundwater monitoring commences, Olympus recommends monitoring wells MW-1, MW-2, MW-3, MW-4, & MW-5 be redeveloped since the last known sample time was at least 2017. Each well will be developed following a pumping and surging method before sampling according to Olympus' Standard Operating Procedures (SOPs) and DEQ guidance. Purge water will be disposed of according to *Disposal of Untreated Purge Water from Monitoring Wells* (DEQ, 2015). Disposal costs are not included in this estimate since it is unknown whether purge water will be discharged to the surface or require disposal. The wells will not be sampled for at least one week following development.

Groundwater Monitoring

The proposed scope of work includes groundwater sampling during seasonal high and low groundwater conditions (anticipated June/November 2025). Groundwater monitoring will include the measurement of static water levels (SWLs) and collection of groundwater samples from five (5) Site wells (MW-1, MW-2, MW-3, MW-4, and MW-5) for laboratory analysis, as well as one field duplicate. SWLs will be measured using an electronic interface probe to develop a groundwater potentiometric map of the Site. The analytical results will be submitted to DEQ following receipt of the laboratory reports after each monitoring event; in an interim data submittal following the first event and a groundwater monitoring report following the second event.

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Groundwater samples will be collected from Site monitoring wells in accordance with Olympus' standard operating procedures for low flow sampling. Groundwater will be purged from wells using a peristaltic pump operating in general accordance with DEQ groundwater Sampling Guidance. Groundwater parameters consisting of dissolved oxygen (DO), specific conductivity (SC), temperature, pH, oxidation reduction potential (ORP) and turbidity will be measured during purging, and measurements will be recorded on groundwater sample information forms which will be included in a summary report. In accordance with DEQ Groundwater Sampling Guidance, dated March 6, 2018, upon parameter stabilization, groundwater samples will be collected into laboratory-supplied containers, preserved, stored on ice, and submitted by chain-of-custody procedure to Pace Analytical Services (Pace) in Mt. Juliet, Tennessee, for analysis of volatile petroleum hydrocarbons (VPH), extractable petroleum hydrocarbon (EPH) screen, and lead scavengers (ethylene dibromide and 1,2-dichloroethane) (1st event only). Should EPH screen results exceed 1,000 micrograms per liter (µg/L), the sample will be fractionated. In addition, should non-aqueous phase liquid (NAPL) be present in MW-1 or MW-5 a hydrocarbon scan analysis will be performed on the NAPL.

Quality assurance/quality control (QA/QC) procedures will be followed for the provision of reliable, accurate, and defensible data. QA/QC samples will be collected into laboratory supplied containers, stored on ice, and submitted to Pace under chain-of-custody procedure. One duplicate QA/QC groundwater sample will be collected for each event to test for precision related to sampling methods. The QA/QC sample will be analyzed for VPH only.

Interim Data Submittal

An interim data submittal will be prepared following the first groundwater monitoring event. The interim data submittal will include a discussion of results, tabulated analytical results, figures showing the results, potentiometric maps of the groundwater surface, and the laboratory analytical report with a data validation summary.

Release Closure Plan

A Release Closure Plan (RCP) will be prepared for the Site, which includes discussion and results of investigative, post-investigative, and corrective action work to date. The RCP will be developed to reflect current Site conditions following the groundwater monitoring. The Site summary, remedial investigation results, conceptual Site model and evaluation of exposure pathways, evaluation of cleanup alternatives and costs for compliance monitoring will be evaluated.

Groundwater Monitoring Report

Olympus will present the results for the 2025 groundwater monitoring events in one Groundwater Monitoring Report. The summary report will include a discussion of groundwater monitoring results, site maps, tabulated analytical data, groundwater sample information forms, analytical laboratory reports, data validation summary, time trend graphs, and conclusions and recommendations based on the monitoring results.

Cost Estimate

Work Plan development, groundwater monitoring and sample collection, and report preparation will be invoiced at unit cost rates approved by the Petroleum Tank Release Compensation Board (PTRCB). Project management will be invoiced on a time and materials basis. A unit cost worksheet for groundwater monitoring is attached to this work plan.

Schedule

Olympus appreciates the opportunity to assist you with this project. Site work will commence upon approval of the work plan by DEQ and obligation of mutually agreed upon funds by PTRCB. The groundwater monitoring events are tentatively scheduled for June and November 2025. Please call me at 406-430-1784 with comments or questions regarding the proposed scope of work or the project.

Sincerely,
Olympus Technical Services, Inc.

Tanner Allen
Staff Geologist

Ethan J. Perro, PG
Project Geologist

Attachments: Figures 1 & 2, and Groundwater Monitoring Unit Cost Work Sheet.

Attachments

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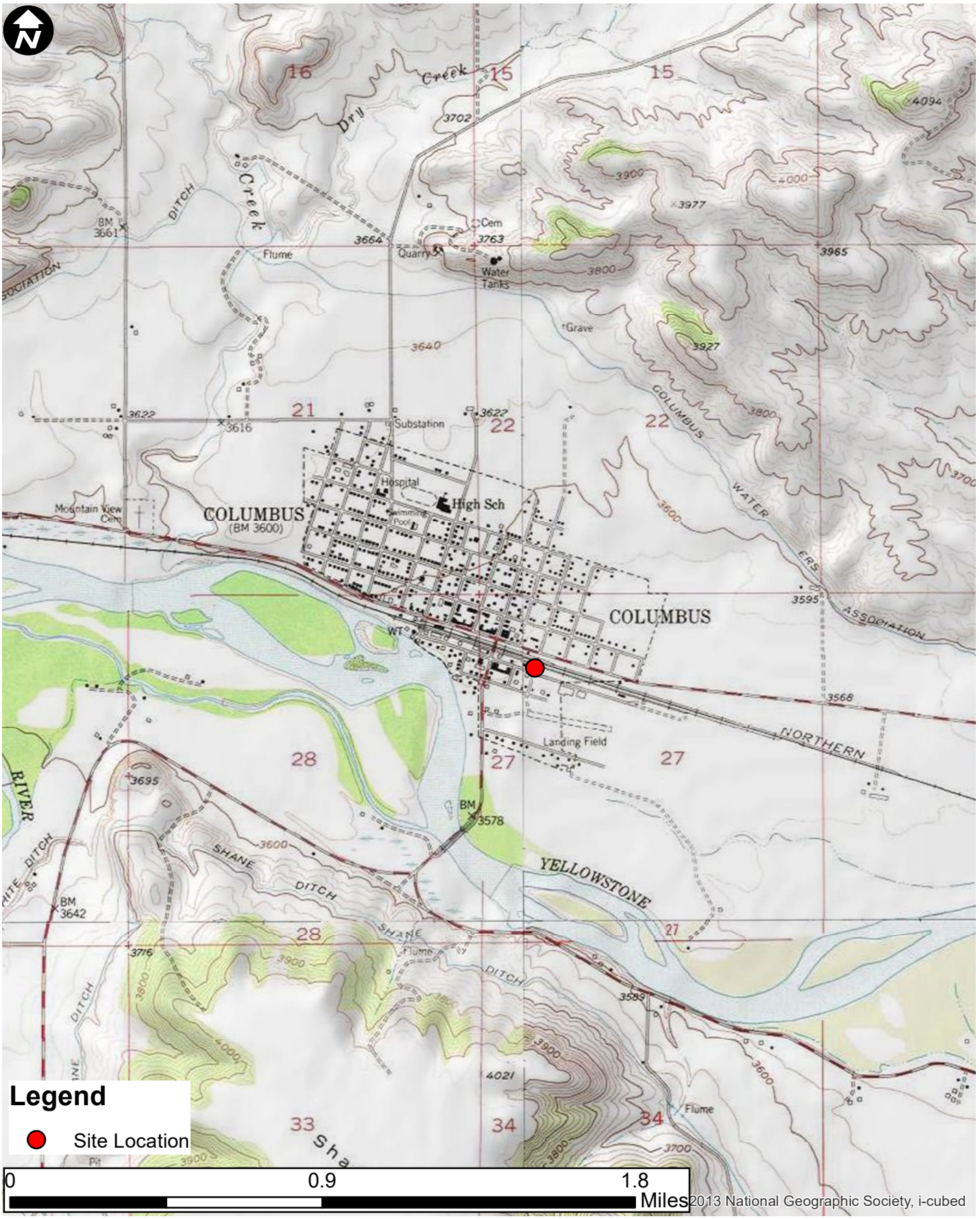

Olympus Technical Services, Inc.	Site Location Topographic Map	FIGURE 1

N

0 50 100 150 200

SCALE IN FEET

Pratte St.

Diamond St.

JW-4 (destroyed)

Former Newman's Bulk Plant

Former USTs

Water Line

Newman's Downtown Exxon

DTX-1

DTX-3

DTX-4

DTX-2

Conc Slab

Platinum Chevrolet

USTs Closed in Place

Pike Ave. (Hwy 78)

JW-04-2

JW-04-3

JW-04-5

JW-04-4

JW-10

JW-9

JW-8

JW-7

JW-6

JW-5

JW-04-1

USTs

GC-1

Git's Conoco

GC-2

GC-3

GC-4

8th St. North

Water Line

Platinum Chevy Sales Lot (paved)

Hwy 78

JW-3

Fertilizer Warehouse

JW-2

Warehouse

W

Jess Wilson Well

MW-1

Railroad Tracks

Clough Ave.

JW-1

Shed

Yard

Krueger Oil

AST

MW-4

Conc Slab

MW-5

Lumber Storage

Historical Tank Location (560 Gallons)

MW-3

MW-2

1st Ave. South

Olympus Technical Services, Inc.				Short Ridge Oil Company Railroad Lease Property Columbus, Montana		Site Map	FIGURE 2
DESIGN:	DRAWN: KR	CHECKED: EP	APPROVED:	DATE: 03/06/25	JOB NO: C3171	SCALE: as shown	FILENAME: C3171 Site Map 03-25.dwg

Petroleum Tank Release Compensation Board
STATE OF MONTANA
P.O. Box 200902 • Helena, MT 59620-0902 • (406) 444-9710

Groundwater Monitoring and Sampling Unit Cost Worksheet

7/28/2022 | Cost Estimate Expl. | Work Plan Tasks | Unit Cost Worksheet | Help

Contractor Information

Company Name:	Olympus Technical Services, Inc.		
Address:	6809 King Avenue West, Unit F		
City, State, Zip:	Billings, MT 59106		
Cost Estimator/Print Name:	Ethan Perro	Phone:	406-245-3554
Signature:		Date:	3/14/2025

Project Information

Site Name:	Former Shortridge Oil (aka Krueger Oil Company)	Facility ID#	48-05082
Address:	800 Clough Avenue	Release #	1928
City:	Columbus	WP ID#	35008
		Treads ID#	28576

Petroleum Tank Release Compensation Board

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7/28/2022

Groundwater Monitoring and Sampling Summary Sheet

Cost Estimate Expl. | Work Plan Tasks | Unit Cost | Help

Monitoring Well Details

5	Total Number of Wells at Site
	Number of Fluid Level Measurements Only (2)
10	Number of Wells to be Monitored/Sampled (4-11)
2	Average Well Casing Diameter (inches)
10	Average Depth to Groundwater (ft)
20	Average Depth of Wells (ft)

Sampling Method

☑	Low-Flow
	Low Yield Aquifer
	No Purge
☐	Other (please specify)

of Events - Monitoring/Sampling Interval

Estimated Start Date: 6/1/2025

2	Semi-Annual
	Annual
	Bi-Annual
	Other

2 **Total Events**

10	< 25 ft total depth
	25 - 50 ft total depth
	50 - 75 ft total depth
	75 - 100 ft total depth
10	Total

Sampling Instrument

X	Peristaltic Pump
	Bladder Pump
☐	Submersible Pump
☐	Bailer
☐	Other (please specify)