



Maverik #731
Facility No. 00-32528
FINAL
Environmental Assessment

**Montana Department of Environmental Quality
Waste and Underground Tank Management Bureau
Underground Storage Tank Section
FINAL ENVIRONMENTAL ASSESSMENT**

COMPANY NAME: Maverik, Inc.	
FACILITY NUMBER: 00-32528	
FACILITY NAME: Maverick #731	
PERMIT NUMBER: 2023-0297	
APPLICATION DATE: May 4, 2023	
LOCATION: 3196 Colonial Drive Helena, MT 59601 (GEOCODE): 05-1888-34-3-01-05-0000	COUNTY: Lewis and Clark
PROPERTY OWNERSHIP: Maverik Inc	FEDERAL <input type="checkbox"/> STATE <input type="checkbox"/> PRIVATE <input checked="" type="checkbox"/>
EA PREPARER: Dylan Lang/Seth Hendrix	EA DATE: 8/10/2023

COMPLIANCE WITH THE MONTANA ENVIRONMENTAL POLICY ACT

Under the Montana Environmental Policy Act (MEPA), Montana agencies are required to prepare an environmental review for state actions that may have an impact on the human or physical environment. The proposed state action is issuance of underground storage tank (UST) installation permit number 23-0297 and an operation permit allowing operation of the underground storage tanks at UST Facility number 00-32528. This environmental assessment (EA) will examine the proposed action, alternatives to the proposed action, and disclose potential impacts that may result from the proposed and alternative actions. The Department of Environmental Quality (DEQ) will determine the need for additional environmental review based on consideration of the criteria set forth in Administrative Rules of Montana (ARM) 17.4.608

SUMMARY OF THE PROPOSED ACTION: Maverick, Inc is proposing to install four (4) new regulated UST systems and one (1) non-regulated Diesel, Ethanol Free (DEF) tank at the new Maverick #731 location in Helena, Montana for storing Unleaded, Diesel, Ethanol Free, Premium and DEF for their new fully attended fueling facility at the site of the new Maverick #731 store. The proposed UST systems include:

Tank(s): This project involves installing the following four (4) regulated double-walled tanks and one (1) non-regulated DEF tank:

Tank #	Capacity in gallons	Substance stored
1	40,000	Unleaded
2	40,000	Diesel
3	16,000	Ethanol Free
4	16,000	Premium
5	8,000	DEF

The gas tanks would be double-walled Xerxes fiberglass reinforced plastic (frp) tanks. One (1) tank is a 3-compartment for a total four (4) new regulated tanks with one (1) compartment being used for DEF. Maverick is also proposing to install fifteen (15) new polyethylene dispenser sumps with new Veeder Root TLS-450 Plus Automatic Tank Gauge (ATG) with five (5) in tank probes, three (3) interstitial tank sensors, twenty (20) sump sensors and a remote overfill alarm for overfill prevention. These tanks would be utilized by the facility for retail fueling at their new convenience store.

Piping: All product piping associated with this facility would be double wall fiberglass piping. Approximately 2,310 feet of double wall reinforced fiberglass plastic piping would be utilized in these tank systems.

Sumps: Fiberglass tank-top sumps would be installed around the tanks' piping and access manways. Polyethylene containment sumps would be installed under each dispenser and transition sumps for future expansion would also be installed. These tank and piping systems will be continuously monitored. Monitoring would be accomplished via internal tank probes, interstitial tank sensors, pressurized electronic line leak detectors as well as continuous sensor monitoring in all containment sumps. A Veeder Root TLS-450 Plus ATG would continuously monitor all operational parameters.

Tank & Piping Monitoring System: The leak detection monitoring system consists of a Veeder Root TLS-450 Plus ATG, Mag Plus series probes, VR 794380-323 liquid sump sensors, and VR 794390-303 tank interstitial brine level sensors.

PURPOSE AND BENEFIT FOR PROPOSED ACTION: DEQ's purpose in conducting this environmental review is to act upon Maverick, Inc's application to authorize the installation of the new UST systems at Facility ID 00-32528 in Helena, MT. DEQ's action on the permit application is governed by the Underground Storage Tank Installer and Inspector Licensing and Permitting Act, Section 75-11 Part 2 et seq, Montana Code Annotated (MCA) and the Montana Underground Storage Tank Act, Section 75-11 Part 5 et seq, MCA and administrative rules adopted under those Acts at Administrative Rule of Montana (ARM) Title 17, chapter 56 et seq. DEQ does not approve the building permit for the convenience store, canopy, or other building structures.

The benefits of the proposed action include supplying retail fuel in Helena, MT.

REGULATORY RESPONSIBILITIES: In accordance with ARM 17.4.609(3)(c), DEQ must list any state, local, or federal agencies that have overlapping or additional jurisdiction or environmental review responsibility for the proposed action and the permits, licenses, and other authorizations required.

The Montana DEQ Solid Waste Section and Hazardous Materials Section has reviewed this environmental assessment. Their comments have been addressed in this document. DEQ's Asbestos Control Program, and DEQ's tribal liaison coordinator were also consulted.

One building permit has been issued to the applicant by the City of Helena, Building Division in Helena, Montana for the location 3196 Colonial Dr in Helena, Montana. The Building Permit number is BCOM22-00023. This building permit is for the Maverick Convenience Store and Gas Station. Soil disturbances and storm water runoff during construction are regulated under the Montana Pollution Discharge Elimination System (MPDES) Authorization. Permit MTR109667 was issued for Storm Water Discharges associated with construction activity.

Table 1: Proposed Action Details

Summary of Proposed Action	
General Overview	Maverick, Inc proposing to install four (4) new regulated UST systems and one (1) non-regulated DEF tank at the new Maverick Convenience Store for storing Unleaded, Diesel, Ethanol Free, Premium and DEF at the location.
Proposed Action Disturbance & Equipment	
Total Lot Acreage	4.53 acres. Disturbed area for the UST system installation would be around 4,500 square feet.
Tank Basin Dimensions (LxWxD in square feet)	150' X 30' X 19'
Piping Trench Linear Feet	860'
Electrical Supply Trench Linear Feet	75 feet from transformer to building
Truck traffic	Trucking during construction for bringing in fill and water, truck traffic after store is open for fueling purposes
Proposed Action	
Duration	Construction Period: 1-3 days for tank installation Construction Hours: Work would occur during weekdays with occasional weekends between hours of 7 am and 5pm. Operational Hours: 24 hours/ 7 days a week Tank Operational Life: Fiberglass double-walled tanks have an operational life that is typically ≈30 years.

Construction Equipment	<ul style="list-style-type: none"> - 1 large excavator - 1 large backhoe - 1 hydraulic lift dump truck - 1 bulldozer - 1 concrete truck - 1 forklift - 1 scissor lift - Miscellaneous light vehicles (i.e., 2 ¾ ton pickups)
Location and Analysis Area	<p>Location: The site address is 3196 Colonial Drive in Helena, Montana (see Figure 2).</p> <p>Analysis Area: The area being analyzed as part of this environmental review includes the immediate project area (Figure 2) as well as neighboring lands surrounding the analysis area as reasonably appropriate for the impacts being considered.</p>
Personnel Onsite	<p>During the UST construction, onsite personnel would vary per task, but generally would be anywhere from 10-12 personnel on site. The general contractor would have a full-time superintendent on site. During construction, onsite personnel would vary per task, but generally would include 1-3 equipment operators and laborers. During operation of the USTs, onsite personnel would consist of at least one trained Class A, B, and C operator to make sure everything operates safely and compliantly. For minimum operator training requirements go to:</p> <p>https://deq.mt.gov/files/Land/UST/Documents/PDFfiles/Class_A_B_C_Training_Montana.pdf</p> <p>Onsite personnel would be performing the Montana UST Program required monthly and annual walkthrough inspection as long as the tanks remain in the ground. Since the site is a manned refueling site, a full-time onsite operator is required to respond to alarms and oversee the maintenance/inspection schedule required by DEQ of the tank systems (see more details under “UST Installation, Operation, and Monitoring Requirements” below).</p>
Structures	<p>During the UST installation project, there would be a temporary portable toilet. After installation there would be underground storage tanks, piping, and ancillary equipment designed to prevent, detect or contain a release from an underground storage tank.</p>
Project Water Source	<p>Water could be brought in from an existing hydrant south of the site. One water wagon would be used for testing containment sums after the UST installation is completed. After construction and installation of the UST is complete, operation of the underground fuel tanks would not use water or discharge any wastewater.</p>
Supplemental Lighting	<p>During the construction of the UST systems, supplemental lighting would not be anticipated. After installation, there would be area lighting associated with large retail fueling facility.</p>
Air Quality	<p>During the UST installation, there may be some dust suppression. After installation, the UST system includes five vertical vent standpipes and submerged fill pipes. Stage 1 vapor recovery is to be installed on all gasoline tank systems.</p>
Water Quality	<p>Stormwater to be managed through SWPPP permit # MTR109667-16214. Water tie in is located on Colonial Drive for main water to site.</p> <p>The project area lies within the Upper Missouri Watershed. The proposed site would be located approximately three miles Northwest from Prickly Pear Creek. A search of the Groundwater Information Center (GWIC) indicated that there are approximately 34 domestic, commercial and irrigation water wells located within one mile of the proposed site, none of the wells are down gradient from the proposed site. The nearest well is 670 feet up-gradient from the proposed project and has a depth of 401 feet. If a release of petroleum fuel occurred from the underground tank and piping system, it would enter the tank basin. Depending on the quantity</p>

	<p>of a release, product could move into native soil and groundwater.</p> <p>Water used for containment sump testing must follow all applicable regulations, including proper disposal of spent test water.</p> <p>Stormwater would be managed under the Montana Pollutant Discharge Elimination System (MPDES) General Permit for Storm Water Discharges associated with construction activity.</p> <p>Protection of ambient water quality standards, drinking water maximum contaminant levels, and prevention of degradation of water quality is achieved through secondarily contained non-corrodible underground tanks/piping and continuous system monitoring to reduce the chance of leaks and spills to the environment.</p>
Solid Waste	<p>Garbage cans and dumpsters would be used during installation to collect miscellaneous solid wastes and would be disposed of at a Montana-licensed solid waste management facility. Construction includes building a dumpster enclosure on site for store to manage solid waste once operational.</p>
Hazardous Substances	<p>Equipment fuel and lubricants would be needed on the site during the construction phase of this project. Petroleum products would be stored in vehicles in original, labeled containers and a clearly labeled slip tank for fuel. No more than 5 gallons of oil and 125 gallons of fuel would be on site at any time during facility construction. The Montana state licensed UST installer would be performing daily inspections on his equipment to ensure that they are in good operating condition. The construction crew would be trained in spill and overfill containment and cleanup. Spill kits and absorbent pads would be onsite at all times, on each truck.</p> <p>No hazardous waste generators are registered at the address listed in this EA.</p> <p>Once the underground storage tanks are permitted, installed, and tested, petroleum products would be stored in double-walled continuously monitored UST systems.</p>
UST Installation, Operation, and Monitoring Requirements	<p>The following compliance, testing, and inspection requirements would be followed regarding this proposed UST installation project:</p> <ol style="list-style-type: none"> <li data-bbox="393 1353 1543 1417">1. Double-walled non-corrodible continuously monitored tanks and piping systems are required for any new UST installation project. <li data-bbox="393 1459 1543 1522">2. An UST installation permit is required to be issued by the DEQ UST program before installation of the regulated UST systems. <li data-bbox="393 1564 1543 1712">3. A DEQ UST program One Time Fill Permit is issued with the UST installation permit. The One Time Fill Permit is issued only to fill the tanks for the purpose of testing the UST systems. A One Time Fill Permit is not a permit to dispense fuel or otherwise operate the UST facility. Testing must be conducted on each tank when no less than 90 percent full. <li data-bbox="393 1755 1543 1924">4. The UST installation permit requires numerous tank and piping test requirements including: <ul style="list-style-type: none"> <li data-bbox="442 1818 1543 1881">• 0.1 gallon per hour (gph) or 0.2 gph EPA-certified tank test conducted on the tank when at least 90 percent full, <li data-bbox="442 1881 1543 1924">• a department approved 0.1 gph or 0.2 EPA-certified ullage tank test,

	<ul style="list-style-type: none"> ● PEI RP 1200 functional testing of all UST system tank and piping interstitial liquid sensors, ● primary pipe installation line testing, ● secondary pipe installation line testing, ● PEI RP 1200 Tank Monitor setup and diagnostic testing, ● Tank Monitor programming requirements for tank and piping shutdown on alarms and failed tests, ● Tank Monitor programming for tank and piping leak detection, hydrostatic sump test of all containment sumps (tank top sumps, transition sumps, and under-dispenser sumps), ● PEI RP 1200 spill bucket tightness testing of the spill containers, ● PEI RP 1200 function testing of the overfill prevention devices (automatic shutoff valve, flapper valve, outside high level overfill alarm, etc.), ● certification of compliance signed by the licensed installer, ● signed UST installation permit, ● signed One Time Fill Permit, ● and Unique GPS coordinates at the fill pipe of these newly installed tanks. <p>5. If all installation permit requirements and testing mandates have been satisfied, a Conditional Operating Permit is issued. The Conditional Operating Permit requires an inspection to be completed by a State Licensed UST inspector between 90 and 120 days from the date of issuance.</p> <p>6. DEQ must review the compliance inspection conducted by a State Licensed UST Inspector to ensure it meets the requirements of the Conditional Operating Permit.</p> <p>7. If DEQ determines that the UST owner/operator meets the requirements of the Conditional Operating Permit inspection, then DEQ issues a three-year UST operating permit to the owner/operator.</p> <p>8. DEQ 30-day, annual, and three-year compliance requirements are described here: http://mtrules.org/gateway/ChapterHome.asp?Chapter=17%2E56</p> <p>9. Refuse associated with the UST installation project activities would be collected, removed, and disposed of in proper disposal sites.</p> <p>10. Disposal of water used for containment sump testing must follow all applicable regulations, including proper disposal of spent test water.</p> <p>11. Requirements at ARM 17.56 subchapter 5 must be followed for release reporting, investigation, confirmation, abatement measures and corrective action. State statutory authority for corrective actions is found in the Montana Underground Storage Tank Act, 75-11-501, MCA, et seq.</p>
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Figure 1: Map of general location of the proposed Maverik UST Project in South Helena, FID 00-32528. (Shaded area within white box).



Figure 2: Proposed Project Site - Physical Address: 3196 Colonial Drive, Helena, MT FID 00-32528

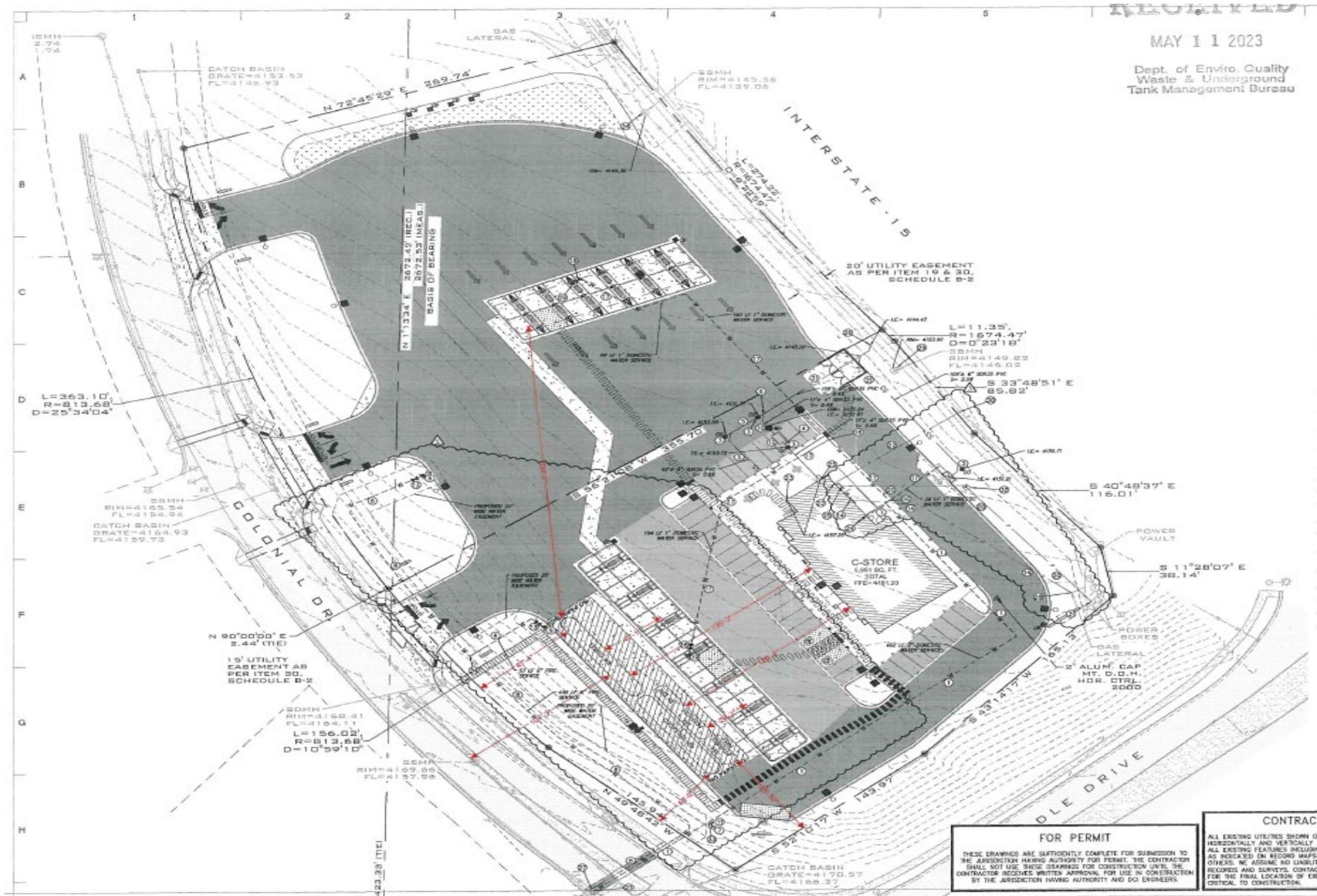


Figure 3: Proposed Maverik Facility Fuel Site Diagram, Facility ID 00-32528

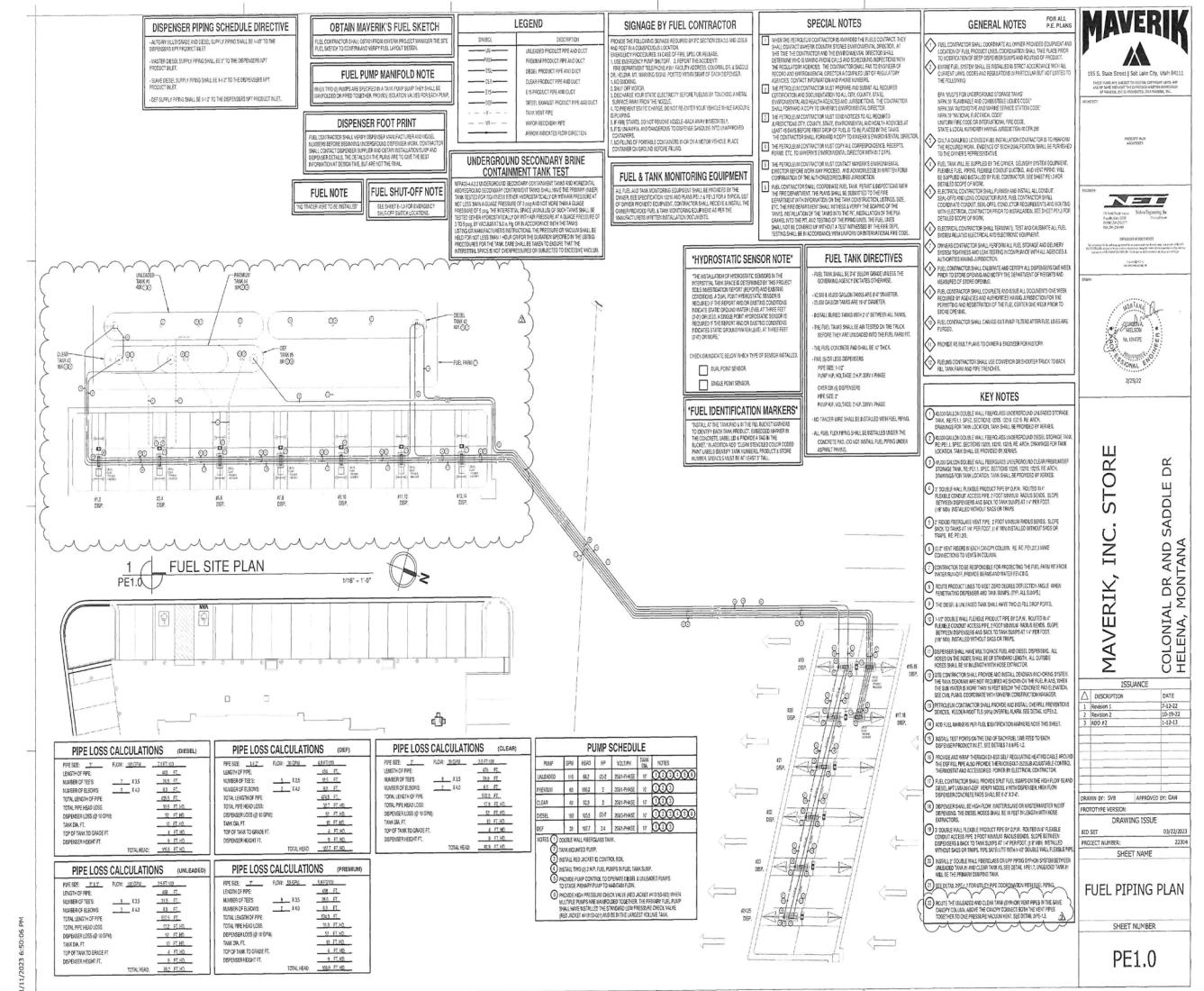
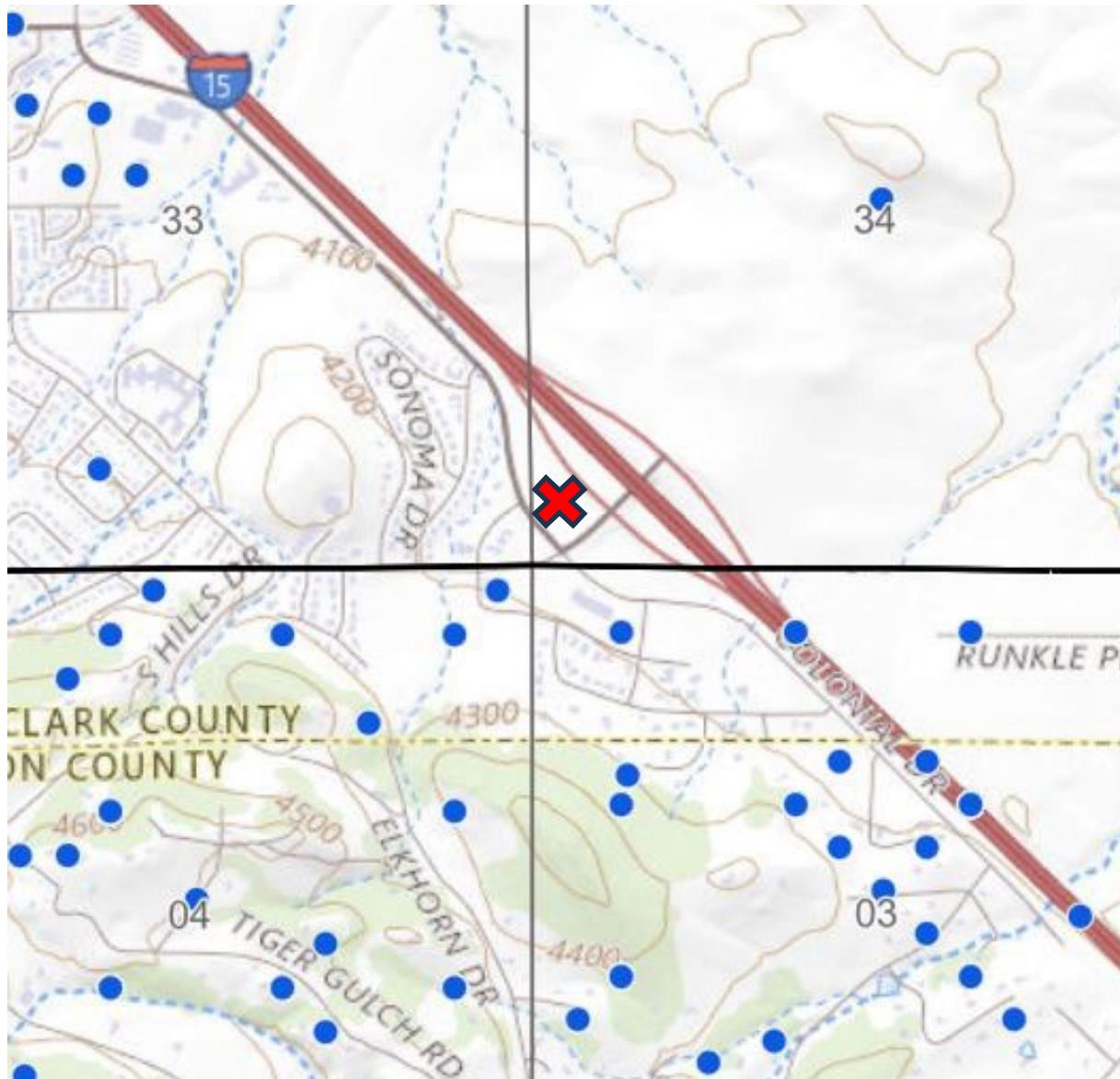


Figure 4: Proposed Maverik site (red X) and nearby water wells (blue dots), Facility ID 00-32528



AFFECTED ENVIRONMENT AND IMPACT BY RESOURCE

2.1 EVALUATION AND SUMMARY OF POTENTIAL IMPACTS

The impact analysis will identify and evaluate direct and secondary impacts TO THE PHYSICAL ENVIRONMENT AND HUMAN POPULATION IN THE AREA TO BE AFFECTED BY THE PROPOSED PROJECT. *Direct impacts* occur at the same time and place as the action that causes the impact. *Secondary impacts* are a further impact to the human environment that may be stimulated, induced by, or otherwise result from a direct impact of the action. (ARM 17.4.603(18)) Where impacts would occur, the impacts will be described in this analysis.

Cumulative impacts are the collective impacts on the human environment within the borders of Montana of the Proposed Action when considered in conjunction with other past and present actions related to the Proposed Action by location and generic type. Related future actions must also be considered when these actions are under concurrent consideration by any state agency through pre-impact statement studies, separate impact statement evaluation, or permit processing procedures.

The duration is quantified as follows:

- **Short-term:** Short-term impacts are defined as those impacts that would not last longer than the installation of the USTs and operation of the UST Facility.
- **Long-term:** Long-term impacts are impacts that would remain or occur following tank closure and removal.

The intensity of the impacts is measured using the following:

- **No impact:** There would be no change from current conditions.
- **Negligible:** An adverse or beneficial effect would occur but would be at the lowest levels of detection.
- **Minor:** The effect would be noticeable but would be relatively small and would not affect the function or integrity of the resource.
- **Moderate:** The effect would be easily identifiable and would change the function or integrity of the resource.
- **Major:** The effect would alter the resource

1. **GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE:** *Are soils present, which are fragile, erosive, susceptible to compaction, or unstable? Are there unusual or unstable geologic features? Are there special reclamation considerations?*

There are no known fragile or unstable soils identified in the project site by the reviewer. The

facility is currently flat, bare, vacant land. There are no unusual or unstable geologic features or special reclamation considerations in the project area according to the 2023 Montana Bureau of Mines and Geology web mapping geologic application.

Direct Impacts:

No unusual or unstable geologic features are present, and no fragile or particularly erosive or unstable soils are present. All topsoil would be removed from the site during the construction phase of this project. Erosion control and other limits and conditions would be accomplished using a variety of Best Management Practices (BMP) including straw berms or straw bales placed at all areas of potential runoff from operations to mitigate impacts to surface water quality from stormwater discharges associated with construction of the facility. During installation, impacts to the geology, soil quality, stability and moisture would be short-term and negligible. After construction has been completed, the entire area would be paved with concrete pads where necessary for traffic. Under ARM 17.56. subchapter 5, UST owners and operators would be required to immediately report and clean up any surface spills.

Secondary Impacts:

No secondary impacts to the geology and soil quality, stability and moisture would be expected.

Cumulative Impacts:

No cumulative impacts to the geology and soil quality, stability and moisture would be expected.

2. WATER QUALITY, QUANTITY, AND DISTRIBUTION: *Are important surface or groundwater resources present? Is there potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality?*

The project area receives an average of 11 inches of precipitation annually. The project area lies within the Upper Missouri Watershed. The proposed site would be located approximately three miles Northwest (upgradient) of Prickly Pear Creek.

As Figure (4) shows, a search of the Groundwater Information Center (GWIC) indicated that there are approximately 48 domestic, commercial and irrigation water wells located within one mile of the proposed site. For the project area, approximate depth to groundwater is between 30-160 feet. The nearest well is 670 feet up-gradient from the proposed project and at a depth of 401 feet. There are no downgradient wells within one mile of the project.

No wetlands were identified within one mile of the project area. No land disturbance or work is proposed within wetland or riparian areas.

Direct Impacts:

Tank leak detection equipment would be installed at the facility. The facility would utilize tank interstitial monitoring sensors. Additional piping leak detection equipment would also be utilized, and liquid sensors would be placed in the tank top and transition sumps. If a leak occurred, the fuel pumping system would automatically shut down and could not be energized again until the source of the leak is identified and addressed. Further, leak detection systems must meet leak rate detection standards of a probability of detection of 0.95 and a probability of false alarm of 0.05.

The applicant would install an overfill prevention valve and an overfill alarm for overfill prevention on the tank systems and use secondary containment sumps. A single wall round tank top sump would be installed around the piping accesses to the tank. Sump boots, which provide a seal around each piping and conduit penetration to the sump, would be compatible with the piping and installed at each sump penetration. All sumps would be hydrostatically tested according to the specific installation conditions.

Secondarily contained, non-corroding, underground tanks/piping and continuous system monitoring would protect ambient water quality, drinking water quality and use, and prevent degradation of surface and ground water quality. Proper operation of this system would decrease the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, and the degradation of water quality. Secondary containment and leak detection systems serve to mitigate the potential impacts by immediately reducing the amount of fuel available for release to the environment and by making early detection of releases possible. The Facility UST systems must meet State installation standards and Montana DEQ UST program construction permit requirements and conditions.

Mitigation and monitoring plans reduce the likelihood of a petroleum fuel product release to the environment. Should a release occur, mitigation and monitoring plans also reduce the amount of product released to the environment. Immediate reporting and containment of any spills or overfills are required, which would reduce surface and groundwater impacts.

Direct impacts to surface and/or ground water are not expected. If a release of petroleum fuel occurred from the underground tank and piping system, it would enter the tank basin. The tank basin would be 19' below ground surface, including bedding, tank, and backfill. Depending on the quantity of a release and if it was not properly contained, product could move into groundwater resulting in potential groundwater contamination above DEQ-7 groundwater standards and department screening levels, resulting in a department tracked "release". If a release is confirmed, DEQ would require remediation to below department standards and health-based screening levels. Should a release occur, and it is not properly contained, the impacts could be long term and minor to moderate.

Secondary Impacts:

No secondary impacts to water quality, quantity and distribution would be expected. However,

should a catastrophic release of petroleum fuel product occur, and it is not properly contained, it could secondarily impact water quality. These impacts could be long term and minor.

Cumulative Impacts:

Soil disturbance associated with construction of this proposed project is under 5,000 square feet. Authorization under the General Permit for Storm Water Discharges associated with construction activity (MTR109667) is not required because the disturbance related to this project is less than one acre.

No cumulative impacts to water quality, quantity and distribution would be expected. However, should a catastrophic release of petroleum fuel product occur, and it is not properly contained, it could secondarily impact water quality. These impacts could be long term and minor.

3. AIR QUALITY: Will pollutants or particulate be produced? Is the project influenced by air quality regulations or zones (Class I Airshed)?

The proposed project site is not located in a Class I Airshed. The closest Class I Airshed is located at 15 miles east of the project site (Gates of the Mountains Wilderness Area).

Direct Impacts:

During construction of the UST installation project, dust particulate may become airborne. However, the applicant would be required to comply with industry standard Best Management Practices for dust control. These BMP's include using water to suppress dust. Impacts to air quality during the UST installation project, would be short-term and negligible.

During operation of the UST system, natural air currents and tank vents would dissipate hydrocarbon vapors to a safe level. Petroleum vapors would be mitigated by natural air currents, submerged fill pipes, and properly designed vent pipes would control hydrocarbon vapors. Impacts to air quality would be short-term and minor.

Secondary Impacts:

No secondary impacts to air quality would be expected.

Cumulative Impacts:

No cumulative impacts to air quality would be expected.

4. VEGETATION COVER, QUANTITY AND QUALITY: Will vegetative communities be significantly impacted? Are any rare plants or cover types present?

Currently, the area where the tanks would be installed is bare, vacant land. The location

currently is bordered by I-15 on the north side and by commercial properties along the southern side. Several small- and large-scale businesses and private residential properties are in the vicinity. No rare plants or cover types have been reported to this reviewer. Currently the project area is covered with musselshell-crago complex type soils and some grass.

Direct Impacts:

Due to the small size of the project area and the absence of rare plants and cover, impacts to vegetative cover, quantity or quality resulting from this project would be short-term and negligible.

Secondary Impacts:

No secondary impacts to vegetation cover, quantity and quality would be expected.

Cumulative Impacts:

No cumulative impacts to vegetation cover, quantity and quality would be expected.

5. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS: *Is there substantial use of the area by important wildlife, birds or fish?*

Direct Impacts:

There is no substantial use of this area by important wildlife, bird, or fish according to Montana Natural Heritage Program MapViewer, 2023. No impacts to important terrestrial, avian and aquatic life and habitats are expected due to the already anthropogenic impacts near the site of Interstate 15, urban streets, residential, and commercial activities in the immediate vicinity of the Proposed Project.

Secondary Impacts:

No secondary impacts to terrestrial, avian, and aquatic life and habitats stimulated or induced by the direct impacts analyzed above would be expected.

Cumulative Impacts:

No cumulative impacts to terrestrial, avian, and aquatic life and habitats stimulated or induced by the direct impacts analyzed above would be expected.

6. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES: *Are any federally listed threatened or endangered species or identified habitat present? Any wetlands? Species of special concern?*

The project site is not in the core, general, or connective sage grouse habitat areas as designated by the Montana Sage Grouse Habitat Conservation Program. There are no endangered species listed for Lewis and Clark County. There are two species listed as threatened identified in Lewis and Clark County. The Canada Lynx is a federally listed threatened species identified within the county. However, no Canada Lynx have been reported around the project area. The United States Fish and Wildlife Service indicates that the Red Knot is known to occur in Lewis and Clark County. This species is also listed as threatened. However, there is no critical habitat for these species in the project area due to the already anthropogenic impacts near the site of Interstate 15, urban streets, residential, and commercial activities in the immediate vicinity of the Proposed Project.

Direct Impacts:

There are no federally listed endangered species, threatened species, species of concern, or identified habitat areas within the project area. Within the one-mile analysis area, no sightings of the Canada Lynx or the Red Knot have been documented according to the Single Species Overview provided by Montana Natural Heritage Program MapViewer, 2023. No direct impacts to unique, endangered, fragile, or limited environmental resources are expected (see secondary impacts).

Secondary Impacts:

No secondary impacts to unique, endangered, fragile, or limited environmental resources that could be stimulated or induced by the direct impacts analyzed above would be expected.

Cumulative Impacts:

No cumulative impacts to unique, endangered, fragile, or limited environmental resources that could be stimulated or induced by the direct impacts analyzed above would be expected.

7. HISTORICAL AND ARCHAEOLOGICAL SITES: *Are any historical, archaeological, or paleontological resources present?*

The State Historic Preservation Office (SHPO) conducted a resource file search for Section 33, 34 T10N, R3W, which indicated that there are few recorded sites within the designated search locale, and none within the project location. In addition to the sites found in the search, there have been three previously conducted cultural resource inventories done in the area.

No cultural inventories have been done within the project location. It is SHPO's position that any structure over fifty years of age is considered historic and is potentially eligible for listing on the

National Register of Historic Places. If any structures are within the Area of Potential Effect, and are over fifty years old, SHPO recommends that they be recorded, and a determination of their eligibility be made prior to any disturbance taking place. As long as there would be no disturbance or alteration to structures over fifty years of age, SHPO determined that there is a low likelihood that cultural properties would be impacted.

DEQ conducted an examination of historic topographic maps that indicate the area has been extensively disturbed during the construction of I-15, the overpass, and the connecting roadways. Due to the heavily disturbed nature of the project location, it is highly unlikely that intact subsurface materials or features could be encountered. SHPO determined that a recommendation for a cultural resource inventory is unwarranted at this time. Should any important cultural resources be encountered, DEQ and SHPO must be appropriately notified.

Direct Impacts:

There are no known historical, archaeological, or paleontological resources present within the project area. Project area is currently vacant, bare land surrounded by developed land indicating a low potential for intact buried deposits. No direct impacts to historical and archaeological sites are expected.

Secondary Impacts:

No secondary impacts to historical and archaeological sites are expected.

Cumulative Impacts:

No cumulative impacts to historical and archaeological sites are expected.

8. AESTHETICS: Is the project on a prominent topographic feature? Will it be visible from populated or scenic areas? Will there be excessive noise or light?

The Proposed Project is adjacent to Nob Hill and the commercial and residential development on this area. The area is in a populated and developed area of Helena, MT.

Direct Impacts:

During operations the underground storage tanks at this location would not be visible from any roadway or to viewers on Nob Hill in the area. The tanks are to be installed Southeast of the lot. The only visible part of the tank system would be a vent standpipe extending three feet over the canopy of the main dispenser area. The proposed project (installation of the underground storage tanks) would be buried underground. There would be no above ground equipment that would be visible except for the vent standpipe. There are several single and multiple family residential properties and commercial businesses within one mile of the project area.

During the construction of the UST installation project, there would be noise associated with the operation of heavy equipment. The construction and installation would be of 1-3 days and would be visible to viewers in the vicinity of the Proposed Project. After the project is completed, there would be no noise associated with the underground storage tanks. Lighting of the building and canopies are not permitted under DEQ.

Other than the vents, the above ground components of the UST systems at the proposed project would not be visible to the surrounding population. Due to the limited above ground components of the UST system, the visual impacts would be negligible during operations.

Secondary Impacts:

No secondary impacts to area aesthetics would be expected as a result of the UST proposed work.

Cumulative Impacts:

No secondary impacts to area aesthetics would be expected as a result of the UST proposed work.

9. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY: *Will the project use resources that are limited in the area? Are there other activities nearby that will affect the project?*

There are no other nearby activities identified near the project area that may be unduly impacted. The neighboring land uses are mixed commercial with residential properties located within one mile of the project.

Direct Impacts:

The UST would be installed on bare vacant land. This UST installation project would need a minimal amount of the environmental resources of land, water, air, or energy. This project would permit the installation of four regulated UST's and one non-regulated DEF tank in what is called a tank nest in which they are all right next to one another. Electricity would be used during installation and during operation of the pump and fuel dispensers. This UST installation project would not otherwise use existing environmental resources of land, water, air, or energy. No major impacts to environmental resources of land, water, air, or energy are expected.

Secondary Impacts:

No secondary impacts to environmental resources of land, water, air, or energy would be expected.

Cumulative Impacts:

No cumulative impacts to environmental resources of land, water, air, or energy would be expected.

10. IMPACTS ON OTHER ENVIRONMENTAL RESOURCES: *Are there other activities nearby that will affect the project?*

There are no other known environmental studies or projects on this land.

Direct Impacts:

Impacts on other environmental resources are not likely to occur as a result of this UST project.

Secondary Impacts:

No secondary impacts to other environmental resources would be expected as a result of the proposed action.

Cumulative Impacts:

No cumulative impacts to other environmental resources would be expected as a result of the proposed action.

11. HUMAN HEALTH AND SAFETY: *Will this project add to health and safety risks in the area?*

The applicant would be required to adhere to all applicable state, federal, and local safety laws. During the construction phase of this project, there are safety risks to the UST system installation crew. Industrial work such as the work proposed by the applicant is inherently dangerous. The Occupational Safety and Health Administration (OSHA) has developed rules and guidelines to reduce the risks associated with this type of labor.

Direct Impacts:

While the UST facility is in operation, it is anticipated that natural air currents and tank vents would dissipate hydrocarbon vapors to a safe level. Spills and overfills during fuel delivery would be mitigated by the installation of double-walled spill containment, overfill prevention valves and an audible overfill alarm. Tank and piping leak detection equipment are designed to detect releases before serious environmental, health or safety problems occur would act as additional methods to ensure health and safety.

Ambient water quality standards, drinking water maximum contaminant levels, and degradation of water quality would be protected by secondarily contained non-corroding underground tanks/piping with continuous system monitoring, which reduces the risk of a petroleum release into the environment.

Proper maintenance and operation of the installed leak detection systems and compliance with Department UST operating requirements would mitigate potential risks to human health and safety by making early detection of releases possible and by immediately reducing the amount of fuel available to be released into the environment.

In the event of system failure and a catastrophic release, product could move into groundwater resulting in potential groundwater contamination above DEQ-7 groundwater standards and department screening levels, resulting in a department tracked “release”. If a release is confirmed, DEQ would require remediation to below department standards and health-based screening levels. Should a release occur, and it is not properly contained, the impacts could be long term and minor to moderate.

Once the UST installation project is completed, the main source of safety risk would be to service personnel who are required to access the tank annually for testing.

As such, impacts to human health and safety would be short-term and minor to moderate.

Secondary Impacts:

No secondary impacts to human health and safety would be expected. However, should a catastrophic release of petroleum fuel product occur, and it is not properly contained, it could secondarily impact human health and safety. These impacts could be long term and minor to moderate.

Cumulative Impacts:

No cumulative impacts to human health and safety would be expected. However, should a catastrophic release of petroleum fuel product occur, and it is not properly contained, it could cumulatively impact human health and safety. These impacts could be long term and minor to moderate.

12. INDUSTRIAL, COMMERCIAL AND AGRICULTURAL ACTIVITIES AND PRODUCTION: *Will the project add to or alter these activities? Will grazing lands, irrigation waters or crop production be affected?*

This project would not change the zoning of the project area which is Partially Exempt Property - Commercial. Grazing lands, irrigation waters, crop production, and industrial activity would not be affected by this project.

Direct Impacts:

There would be no impacts to industrial or agricultural activities or production. The change in the property use is long-term with negligible impact due to the existing commercial and residential character of the project area.

Secondary Impacts:

No secondary impacts to industrial, commercial, and agricultural activities and production would be expected as a result of the proposed project.

Cumulative Impacts:

No cumulative impacts to industrial, commercial, and agricultural activities and production would be expected as a result of the proposed project.

13. QUANTITY AND DISTRIBUTION OF EMPLOYMENT: *Will the project create, move or eliminate jobs? If so, estimated number.*

Direct Impacts:

During the construction phase of this project, approximately 10 to 15 jobs would be created for a period of approximately 1 to 3 days. The end project result would be a new gas station and convenience store. DEQ is permitting the installation of the UST system and not the convenience store.

No adverse impacts on quantity and distribution of employment is anticipated as a result of this project. The construction project plan calls for several short-term, contracted employees during construction. No lasting negative impacts to employment would be expected from this project. The UST system would require a Class A, B and C Operator. A compliance inspector would need to inspect the UST system every 3 years. Direct impacts to quantity and distribution of employment would be long-term and minor.

Secondary Impacts:

Secondary impacts to quantity and distribution of employment are expected to be long-term and minor. The UST system additional work may be generated if the UST system needs repairs or modifications. Secondary impacts to quantity and distribution of employment would be long-term and negligible.

Cumulative Impacts:

No cumulative impacts to quantity and distribution of employment are expected as a result of the proposed project.

14. LOCAL AND STATE TAX BASE AND TAX REVENUES: *Will the project create or eliminate tax revenue?*

Direct Impacts:

The UST installation project would generate additional local or state tax revenue. If the facility is completed and in operation, fuel, income and additional property tax revenue would be generated. The UST system would require a Class A, B and C Operator. A compliance inspector would need to inspect the UST system every three years. Additional work may be generated if the UST system needs maintenance or modifications.

Secondary Impacts:

No secondary impacts to local and state tax base and tax revenues would be expected as a result of the proposed project.

Cumulative Impacts:

No cumulative impacts to local and state tax base and tax revenues are expected from the UST installation but would however generate fuel tax revenue once the UST's are in operation.

15. DEMAND FOR GOVERNMENT SERVICES: *Will substantial traffic be added to existing roads? Will other services (fire protection, police, schools, etc.) be needed?*

During the installation of the UST system for 1- 3 days there would be an increase traffic volume coming on and off of I-15 as it is located at the South Helena exit. Residential and business traffic may increase as the site would be the closest centralized fuel within two miles.

An increase in law enforcement and fire protection activities (increased calls and routine patrols) in the area may increase slightly during the installation period of 1-3 days.

Direct Impacts:

The UST installation project would add additional truck traffic to Colonial Drive for a period of 1-3 days. The impact would be short-term and minor.

The project result is not anticipated to increase demand for fire protection or law enforcement.

Secondary Impacts:

After construction, there may be an increase in traffic. Secondary impacts would be long-term and minor.

Cumulative Impacts:

No cumulative impacts for demand for government services are expected as a result of the proposed UST project.

16. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS: *Are there State, County, City, USFS, BLM, Tribal, etc. zoning or management plans in effect?*

There are no known local, county, state, or federal environmental management plans that would impact this project development. The proposed project and associated development are expected to be in conformance with current City of Helena, Lewis and Clark County.

Direct Impacts:

DEQ is not aware of any other locally adopted environmental plans or goals that would impact this proposed project or the project area. The City of Helena Growth Policy was reviewed, no adverse environmental impacts were indicated. Impacts from or to locally adopted environmental plans and goals would not be expected as a result of this project.

Secondary Impacts:

No secondary impacts to the locally adopted environmental plans and goals are expected as a result of the proposed project.

Cumulative Impacts:

No cumulative impacts to locally adopted environmental plans and goals are expected as a result of the proposed project.

17. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES: *Are wilderness or recreational areas nearby or accessed through this tract? Is there recreational potential within the tract?*

No designated recreational properties are located within or accessed through the project area.

Direct Impacts:

No impacts to the access to or quality of recreational and wilderness activities would be expected to result from the project.

Secondary Impacts:

No secondary impacts to access and quality of recreational and wilderness activities would be expected as a result of the proposed project.

Cumulative Impacts:

No cumulative impacts to access and quality of recreational and wilderness activities are expected as a result of the proposed project.

18. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING: *Will the project add to the population and require additional housing?*

The project is located on a vacant commercial property off the South Helena I-15 exit. This is a pre-developed area consisting of a mix of business buildings and residential homes.

Direct Impacts:

It is not anticipated that the project would add to the population or require additional housing. The project result is anticipated to have little potential to add to the population and require additional housing as it would employ only 2-4 people during the UST installation. No large impact to population density and housing would be expected from this UST installation project.

Secondary Impacts:

No secondary impacts to density and distribution of population and housing would be expected as a result of the proposed project.

Cumulative Impacts:

No cumulative impacts to density and distribution of population and housing are expected as a result of the proposed project.

19. SOCIAL STRUCTURES AND MORES: *Is some disruption of native or traditional lifestyles or communities possible?*

The project is located on commercial property on the West side of I-15 in South Helena. The project would not replace any preexisting structures.

Direct Impacts:

The proposed project would occur entirely on private land owned by Maverik Inc. No direct impacts of native or traditional lifestyles would be expected.

Secondary Impacts:

Secondary impacts to social structures and mores would not be expected as a result of the proposed project.

Cumulative Impacts:

No cumulative impacts to social structures and mores are expected as a result of the proposed project.

20. CULTURAL UNIQUENESS AND DIVERSITY: *Will the action cause a shift in some unique quality of the area?*

The proposed project is in a developed area in South Helena.

Direct Impacts:

There are several single and multiple family residential properties along with commercial development within one mile of the project area. No impacts to cultural uniqueness and diversity would be expected from this project. It is not anticipated that the action would cause a shift in the unique quality of the area.

No impacts to cultural uniqueness and diversity would be expected from this project.

Secondary Impacts:

No secondary impacts to cultural uniqueness and diversity would be expected as a result of the proposed project.

Cumulative Impacts:

No cumulative impacts to cultural uniqueness and diversity are expected as a result of the proposed project.

20. PRIVATE PROPERTY IMPACTS: *Are we regulating the use of private property under a regulatory statute adopted pursuant to the police power of the state? (Property management, grants of financial assistance, and the exercise of the power of eminent domain are not within this category). If not, no further analysis is required. Does the proposed regulatory action restrict the use of the regulated person's private property? If not, no further analysis is required. Does the agency have Legal discretion to impose or not impose the proposed restriction or discretion as to how the restriction will be imposed? If not, no further analysis is required. If so, the agency must determine if there are alternatives that would reduce, minimize or eliminate the restriction on the use of private property, and analyze such alternative.*

The proposed project would take place on private land owned by the applicant. DEQ's approval of the UST installation project may affect the use of real property by the applicant and by nearby private landowners. DEQ has determined, however, that the license conditions are reasonably necessary to ensure compliance with applicable requirements under the Montana Underground Storage Tank Act, which will minimize risk of petroleum impacts on neighboring properties, and compliance with UST requirements has been agreed to by the applicant. Therefore, DEQ's approval of the proposed action would not have private property-taking or damaging implications.

Direct Impacts:

The proposed project would occur entirely on private land owned by Maverik Inc. No direct impacts of private property are expected due to the area being zoned Partially Exempt Property – Commercial.

Secondary Impacts:

Secondary impacts to private property would not be expected as a result of the proposed project.

Cumulative Impacts:

No cumulative impacts to private property are expected as a result of the proposed project.

21. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES:

DEQ is not aware of any other appropriate social and economic circumstances that are related to this project. Due to the nature of the proposed activities, no further direct secondary or cumulative impacts would be anticipated from this project.

ALTERNATIVES CONSIDERED:

In addition to the proposed action, DEQ also considered the "no action" alternative. The "no action" alternative would deny the approval of the proposed action. The applicant would lack the authority to install the UST system on their private land. The no action alternative forms the baseline from which the impacts of the proposed action can be measured.

If the applicant demonstrates compliance with all applicable rules and regulations as required for approval under Title 75, Chapter 11, Part 2 and Part 5, Montana Code Annotated (MCA) and Administrative Rules of Montana, Title 17, Chapter 56. The "no action" alternative would not be appropriate. Pursuant to § 75-1-201(4), MCA, DEQ "may not withhold, deny, or impose conditions on any permit or other authority to act based on" an environmental assessment.

This environmental review analyzes the proposed project submitted by the applicant. In addition to the proposed action, the applicant has obtained various permits and licenses for the construction of the building and infrastructure for the new facility.

The area of the proposed project is located on the West side of I-15 on the corner of Colonial Drive and Saddle Drive. The physical address for the proposed project is 3196 Colonial Drive, Helena, Montana 59601. The project area is currently bare vacant land.

No other FWP, DNRC, BLM, or USFS regulated projects were identified within one mile of the proposed project.

DEQ considered all impacts related to this project and secondary impacts that may result. Cumulative impacts related to this project would not be significant.

PUBLIC INVOLVEMENT:

DEQ published a Draft EA on Montana DEQ's website and provide a 10-day public comment period. A copy of this Environmental Assessment has been posted on our website at [Public Participation & Engagement at DEQ, MEPA at Montana DEQ \(mt.gov\)](#), [and Open Public Comment Periods at Montana DEQ \(mt.gov\)](#). The public was invited to provide public comment on the Draft EA.

Internal scoping consisted of internal review of the environmental assessment document by DEQ staff. Scoping efforts also included queries to the following websites/ databases/ personnel:

- Montana State Historic Preservation Office
- City of Helena
- Lewis and Clark County, MT
- Montana Sage Grouse Habitat Conservation Program
- Montana Fish, Wildlife, and Parks
- Montana Department of Environmental Quality
- US Geological Society - Stream Stats
- Montana Natural Heritage Program
- Montana Cadastral Mapping Program
- Montana Groundwater Information Center
- Montana Bureau of Mines and Geology
- United States Environmental Protection Agency
- United States Department of Fish and Wildlife Service
- Google Maps and Google Earth

OTHER GOVERNMENTAL AGENCIES WITH JURISDICTION:

The proposed project would be fully located on private land owned by Maverik Inc. All applicable state and federal rules must be adhered to, which may also include other local, state, federal, or tribal agency jurisdiction.

RESPONSE TO COMMENTS

The comment period on the Draft EA started on July 24, 2023. The public comment period ended on August 2, 2023. During the comment period, DEQ received one submission. Comments covered several topics from the Draft EA. DEQ read, summarized, combined, and considered the substantive elements from the comments. The comments below are organized by and addressed within each theme. The themes are bolded. Commenter comments are shown in italics. Responses from DEQ are below each comment.

GENERAL

Comment #1:

One commenter requested an extension of the public comment period.

DEQ received a request for an extension of the public comment period. However, DEQ was unable to extend the public comment period because of the time limit provided in ARM 17.56.1303(4).

Comment #2: *One commenter expressed concern over the use the word "should" in the document, commenting that the appropriate term is "must."*

Throughout the comments, one commenter referred to the DEQ's Draft Environmental Assessment as "the proposed permit." On the date that DEQ received the comments DEQ had not prepared a "permit". DEQ solicited comments on a draft version of an EA because a permit application had been submitted. Accordingly, DEQ believes this comment, and the other comments made in response to the "proposed permit" were in fact, made in response to the draft EA.

The word "should" is used eight times in the draft EA. Specifically, "should" is used seven times to address the possibility of a release at the facility, and once to address the possibility of an encounter with important cultural resources. "Should" is the correct word choice because it is not certain that a release would occur, or that cultural resources would be encountered. When DEQ issues permits, it uses more prescriptive language. Therefore, DEQ disagrees with this comment.

TRAFFIC

Comment #3: *One commenter noted that the EA does not consider the impact on traffic, including the ability of semis and fuel trucks to access the site safely using the roundabout, and the additional traffic generated by drivers looking for fuel.*

DEQ's review of the impact on traffic is limited because the direct impact from the installation, operation and maintenance of the UST system would be limited. However, DEQ did evaluate traffic during the proposed UST installation project, under "DEMAND FOR GOVERNMENT SERVICES:" Specifically, the EA considered whether "substantial traffic [would] be added to existing roads...," and whether "other services (fire protection, police, schools, etc.) [would] be needed?" The EA established that the UST installation project would add additional truck traffic to Colonial Drive for a period of 1-3 days. The impact would be short-term and minor. Reviewing the impact on traffic after the UST installation project would be completed is outside the scope of what DEQ is tasked to review.

AESTHETICS

Comment 4:

One commenter expressed concern that the EA does not study the impact on a nicer looking commercial and residential area.

The EA associated with this UST application does consider aesthetics. However, the scope of the EA is limited to the impacts from the construction, maintenance, and operation of the UST system. The EA notes that the only visible part of the tank system would be a vent standpipe extending three feet over the canopy of the main dispenser area. There would be no above ground equipment that would be visible except for the vent standpipe.

The EA notes that during the UST installation project, there would be noise associated with the operation of heavy equipment. The EA also notes that the construction and installation would take

place over a period of 1-3 days and would be visible to those in the vicinity of the proposed project. However, after the project is completed, there would be no noise associated with the underground storage tanks, and other than the vents, the above ground components of the UST system at the proposed project would not be visible to the surrounding population.

WATER RESOURCES

Comment #5: *One commenter expressed concern that a groundwater well could be put in much closer to the truck stop than those already identified, and requested DEQ analyze this possibility.*

An EA cannot possibly analyze the impact of every potential activity that may occur nearby the proposed UST system. However, potential impacts to groundwater wells (including future ones) are mitigated by federal and state regulations that require new underground storage tanks and piping to be double-walled, with piping terminating in containment sumps. Additionally, tanks and piping must be continuously monitored for leaks. If a leak occurs, the pumping system automatically shuts down and cannot be energized again until the source of the leak is identified and addressed. Further, leak detection systems must meet leak rate detection standards of a probability of detection of 0.95 and a probability of false alarm of 0.05. Finally, these systems are designed to shut down with the detection of leaks as small as 0.2 gallons per hour. Impacts to groundwater from a potential release from a UST system would be mitigated by compliance with leak detection requirements and other operation and maintenance requirements of the Montana Underground Storage Tank Act.

NEED FOR FURTHER ANALYSIS AND SIGNIFICANCE OF POTENTIAL IMPACTS

When determining whether the preparation of an environmental impact statement is needed, DEQ is required to consider the seven significance criteria set forth in the Administrative Rules of Montana (ARM) 17.4.608, which are as follows:

1. The severity, duration, geographic extent, and frequency of the occurrence of the impact; “Severity” is analyzed as the density of the potential impact while “extent” is described as the area where the impact is likely to occur. An example could be that a project may propagate ten noxious weeds on a surface area of 1 square foot. In this case, the impact may be a high severity over a low extent. If those ten noxious weeds were located over ten acres there may be a low severity over a larger extent.
“Duration” is analyzed as the time period in which the impact may occur while “frequency” is how often the impact may occur. For example, an operation that occurs throughout the night may have impacts associated with lighting that occur every night (frequency) over the course of the one season project (duration).
2. The probability that the impact will occur if the proposed action occurs; or conversely, reasonable assurance in keeping with the potential severity of an impact that the impact will not occur;
3. Growth-inducing or growth-inhibiting aspects of the impact, including the relationship or contribution of the impact to cumulative impacts;
4. The quantity and quality of each environmental resource or value that would be affected, including the uniqueness and fragility of those resources and values;
5. The importance to the state and to society of each environmental resource or value that would

be affected;

6. Any precedent that would be set as a result of an impact of the proposed action that would commit DEQ to future actions with significant impacts or a decision in principle about such future actions; and
7. Potential conflict with local, state, or federal laws, requirements, or formal plans.

The severity, duration, geographic extent, and frequency of the occurrence of the impacts associated with the proposed state action would be limited. **Maverik, Inc.** is proposing to install an UST system at the or their new convenience store location in Helena, Montana.

DEQ has not identified any significant impacts associated with the proposed installation and operation for any environmental resource. Approving the **Maverik, Inc.** Installation and operation does not set precedent that commits DEQ to future actions with significant impacts or a decision in principle about such future actions. If the applicant submits another license application, DEQ is not committed to issue those authorizations. DEQ would conduct another environmental review for any subsequent authorizations sought by the applicant. DEQ would then decide based on the criteria set forth in the Underground Storage Tank Installer and Inspector Licensing and Permitting Act, Section 75-11-212, et seq, Montana Code Annotated (MCA) and the Montana Underground Storage Tank Act, Section 75-11-501, MCA et seq. and administrative rules adopted under those Acts at Administrative Rule of Montana (ARM) Title 17, chapter 56.

Approving permit number 23-0297 and issuing an operating permit allowing installation and operation of the underground storage tanks at UST Facility number 00-32528 does not set a precedent for DEQ's review of other applications, including the level of environmental review. The level of environmental review decision is made based on a case-specific consideration of the criteria set forth in ARM 17.4.608.

The proposed state action presents additional growth-inducing infrastructure to the already urban geographic location. Based on a consideration of the criteria set forth in ARM 17.4.608, the proposed state action is not predicted to significantly impact the quality of the human environment. Therefore, currently, preparation of an environmental assessment is determined to be the appropriate level of environmental review under the Montana Environmental Protection Act.

Recommendation for Further Environmental Analysis: [] EIS [] More Detailed EA [X] No Further Analysis

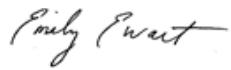
Environmental Assessment prepared by:

Dylan Lang/Seth Hendrix

Environmental Science Specialists - Underground Storage Tank Section
Tanks, Brownfields, and Federal Facilities Bureau

Approved By:

SIGNATURE



Date: August 10, 2023

Emily Ewart, Section Supervisor for Underground Storage Tank Section
Department of Environmental Quality