

**Former On Your Way Fuel
Community Relations Plan**

723 W. Main, Lewistown, Montana

August 2019

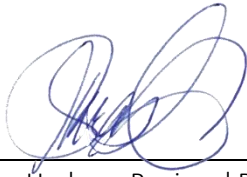
Prepared by:



Snowy Mountain Development Corporation

613 N.E. Main Street, Lewistown, MT 59457

**Former On Your Way Fuel
Community Relations Plan
723 W. Main St., Lewistown, Montana**



Prepared by: _____
Sara Hudson, Regional Director
Snowy Mountain Development Corporation

8/12/19
Date

Approved by: _____
Greg Davis, Brownfields Project Manager
U.S. Environmental Protection Agency, Region VIII

Date

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LIST OF ABBREVIATIONS AND ACRONYMS

ABCA	Analysis of Brownfields Cleanup Alternatives
ACM	Asbestos Containing Materials
AOC	Analytes of Concern
BGS	Below Ground Surface
CRP	Community Relations Plan
MDEQ	Montana Department of Environmental Quality
PBS&J	PBS&J Consultants LTD
QEP	Qualified Environmental Professional
RI	Remedial Investigation
Site	Former On Your Way Fuel 723 W. Main St. Lewistown, Montana
SMDC	Snowy Mountain Development Corporation
TBA	Targeted Brownfields Assessment
U.S.	United States
UST	Underground Storage Tank
VPH	Volatile Petroleum Hydrocarbons
WESTON®	Weston Solutions, Inc.

OVERVIEW

This Community Relations Plan (CRP) describes Snowy Mountain Development Corporation's (SMDC) strategy to address potential concerns of residents who may be affected by environmental remediation activities conducted at the Former On Your Way Conoco property at 723 W. Main Street in Lewistown, Montana (Site). The CRP also summarizes public notifications and community involvement, which has occurred to-date, for activities at the Site.

SPOKESPERSON AND ADMINISTRATIVE RECORD

The spokespersons for the project are Kathie Bailey, SMDC Executive Director, Sara Hudson, SMDC Regional Director and Weston Solutions'® Project Manager Owena Yang-Totorica, who is the acting Qualified Environmental Professional (QEP) for SMDC under contract.

Ms. Bailey may be contacted at: bailey@snowymountaindevelopment.com or (406) 535-2591.

Ms. Hudson may be contacted at: info@snowymountaindevelopment.com or (406) 535-2591.

Ms. Yang-Totorica may be contacted at: owena.yang-totorica@westonsolutions.com or (210) 308-4302.

The administrative record files are located at SMDC at 613 N.E. Main Street, Lewistown, Montana and includes the following documents related to environmental assessment and remediation of the project site:

- Community Relations Plan (CRP);
- Analysis of Brownfield Cleanup Alternatives (ABCA);
- Any public comments received along with SMDC's response to those comments; and
- Any assessment documents, MDEQ work plans and cleanup completion documentation outlining the cleanup standards post-cleanup.

SITE DESCRIPTION AND HISTORY

SITE LOCATION

The Site consists of one property located at 723 W. Main St, in Lewistown, Montana (Figure 1). The legal description for 723 W. Main St. is: Stafford Add (Lewistown), Section 15, Township 15 N, Range 18 E, Block 017, Lot 005 – 006. Currently, the Site consists of one commercial building (slab-on-grade construction) and a parking lot (Figure 2).

Air sampling also occurred in the basement and main floor of the private residence at 713 West Main, Lewistown, Fergus County, Montana (Figure 2). The legal description for this property is: Stafford Add (Lewistown), Section 15, Township 15 N, Range 18 E, Block 017, Lot 003 – 004 (Figure 2).

The Site is located at an elevation of approximately 3,967 feet above mean sea level and drains to the north. No surface water bodies are present on-Site.

Depth-to-water in the area of the Site was between 6 and 9 feet (ft.) below ground surface (bgs) during the high water sampling event (June 2018), and between 7 and 10 ft. bgs during the low water sampling event (September 2018).

SITE HISTORY

The first structure on-Site was constructed in 1955. The Site historically operated as a gas station with three 4,000-gallon underground storage tanks (USTs) that contained gasoline. Soil contamination was noted during piping upgrades, and MT DEQ was notified of a petroleum release on August 19, 1999. The Site most recently operated as a restaurant, but is currently unoccupied.

Historical fueling activities conducted at the Site resulted in a release of petroleum hydrocarbons to the soil and groundwater. Several investigations into the soil and groundwater contamination date back to at least 2006. Analytes of concern (AOCs) identified during previous investigation in the soil and groundwater consist of VPHs.

In August 2006, NCI installed multiple soil borings and eight groundwater monitoring wells at the Site. Sample results for both soil and groundwater exceeded MT DEQ Risk-Based Screening Levels (RBSLs) for VPH constituents. The highest groundwater contamination levels were observed in MW-1 (this well was downgradient of the former USTs, near the current location of MW-9), MW-2, MW-3, and MW-6 (NCI, 2007).

In March 2009, PBS&J excavated approximately 340 cubic yards of soil from the west edge of the Site, in the area of the former UST basin (Figure 3). Soil samples were collected and clean fill was backfilled into the excavation. One soil analytical sample collected from the east sidewall of the excavation resulted in exceedances of MT DEQ Tier 1 RBSLs for VPH constituents. Groundwater sample results collected from existing MW-2, MW-3, and MW-6 also showed MT DEQ Tier 1 RBSL exceedances for VPH constituents (PBS&J, 2010).

In April and July 2012, additional soil borings and monitoring wells (MW-9 and MW-10) were installed at the Site, and groundwater samples were collected from new and existing wells. Groundwater sample results from this investigation showed MT DEQ Tier 1 RBSL exceedances in MW-2, MW-3, MW-6, MW-9, and MW-10 for petroleum hydrocarbon constituents, with the highest concentration of benzene observed in MW-6 (Atkins, 2012).

In March 2015, Resource installed additional monitoring wells on and downgradient of the Site. Although this investigation was not specifically targeting the Site, samples from multiple monitoring wells installed during this investigation reported MT DEQ RBSL exceedances for VPH constituents in the area (Resource, 2015).

WESTON® performed a Remedial Investigation (RI) at the Site in June and September 2018 to investigate petroleum contamination related with Release #3790 (WESTON®, 2019). During this RI, groundwater, indoor air, ambient air, and sub-slab soil vapor samples were collected. Concentrations of benzene in the groundwater exceeded the MT DEQ RBSL. Sub-slab soil vapor samples indicated petroleum contamination exists in the soil vapor below the on-Site structure and the Residence. Indoor air samples indicated sub-slab soil vapors beneath the on-Site structure and the Residence are migrating into the structures. The detections of petroleum constituents in the indoor air samples collected at the on-Site structure and Residence indicated migration of vapors from the sub-slab space. The ambient air sample did not indicate that petroleum hydrocarbon impacts were present in the outdoor air at levels that are an immediate threat to human health or the environment.

COMMUNITY PROFILE

The Former On Your Way Fuel property is located in Lewistown, Montana, the Fergus County Seat. Lewistown's population is 5,942¹ with a median age of 43.4 years² and an estimated median household income of \$40,612.³ The Site is located in a commercial area of Lewistown, surrounded by residential apartments, single family homes, and other commercial businesses. The local fire department, the Lewistown Fire Department, is located at 305 W Watson St. and serves the town and surrounding area. Holly Phelps is currently serving as the City Manager.

NATURE AND THREAT TO PUBLIC HEALTH AND ENVIRONMENT

AOCs and affected media related to historical fueling activities include petroleum hydrocarbon contamination of soil and groundwater, and potential vapor intrusion affecting structures on-Site and nearby. Potential exposure of human receptors to the AOCs in soil may occur during future redevelopment activities through direct contact, inhalation of dust, or incidental ingestion of soil. In addition, groundwater contamination beneath the Site poses additional exposure risks. Potential exposure to contaminated soil vapors could occur through inhalation. Specific AOCs in groundwater and soil, based on available Site history, include VPH.

The purpose of the project is to protect human health and the environment by remediating the deleterious impacts of contamination. The project goal is to mitigate the identified contaminants to levels appropriate, so that the property may be excavated during the 2019 field season and to conduct an additional round of PVI assessment in the winter. This will make way for redevelopment.

¹ ACS 5-year estimates used. 2017 represents average characteristics from 2013-2017. Data Sources: U.S. Department of Commerce. 2018. Census Bureau, American Community Survey Office, Washington, D.C.

² *Ibid.*

³ *Ibid.*

PROPERTY REDEVELOPMENT PLANS

The former On Your Way Fuel property is located in the downtown historic Courthouse District, across from the historic Fergus County Courthouse and two doors down from the historic Lewistown Carnegie Library. Neither the Courthouse nor the Library have adequate public parking to accommodate the increasing number of patrons who visit. Instead, visitors park along the residential streets that bound the District. This is a less-than-desirable arrangement for homeowners and mobility-impaired patrons. Short-term redevelopment plans are to demolish the remaining structure located on the former On Your Way Fuel property to allow for public parking. Long-term redevelopment plans are to identify and secure funding to solicit proposals for a concept development plan that will integrate the use of the property with the unique historic character of the Courthouse District.

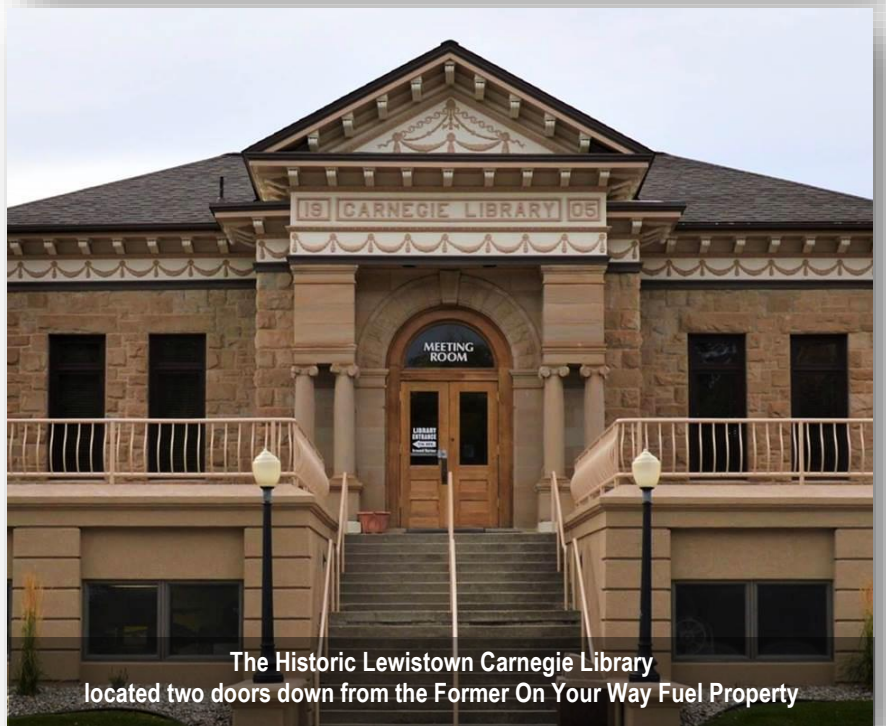
Fergus County owns the property by way of Quit Claim Deed filed in November 2017. Working in partnership with Snowy Mountain Development Corporation, the Montana Department of Environmental Quality, and the U.S. Environmental Protection Agency, the County intends to complete the recommended remediation, excavation and demolition of the structure.



Former On Your Way Fuel Property located in the Historic Courthouse District in Lewistown, MT



The Historic Fergus County Courthouse located across the street from the Former On Your Way Fuel Property



The Historic Lewistown Carnegie Library located two doors down from the Former On Your Way Fuel Property

BENEFITS TO THE COMMUNITY

Demolition of the on-Site building and removal of the ACM within the building reduces the human health risk for future building development. Removing the impacted soil, and replacing it with clean fill material, drastically lowers the risk to neighboring residential areas and businesses posed by contaminants on the property. Remediating the Site will allow the current owner to sell the property after he completes the redevelopment. The ability to sell the property without restrictions or encumbrances will provide opportunities for new employment, as well as allow for redevelopment in an economically viable location in the heart of Lewistown. This property is situated within the historic Courthouse District and is across from the historic Fergus County Courthouse and two doors down from the historic Lewistown Carnegie Library. Demolishing the remaining structure, clearing the site of contaminants, and requiring long-term development plans to integrate the historic character of the District will safeguard human health and provide a more aesthetically-pleasing development for the community, which has been proven to promote additional redevelopment.

PUBLIC COMMUNICATION

Overall, the current landowner and general public, through various landowner correspondence and meetings, have stated that they would like to see the Site remediated to permit redevelopment to safeguard human health.

COMMUNICATION OUTREACH

SMDC updates Site and project status information on its organizational website: www.snowymountaindevelopment.com. In addition, Brownfields projects are summarized in SMDC's Executive Director's Reports, which are discussed at SMDC's Board Meetings, and uploaded to its electronic publishing platform on ISSUU: <https://issuu.com/snowymountaindevelopment>. SMDC staff also upload photos and project information on its Facebook page: www.facebook.com/snowymountaindevelopment and LinkedIn page: <https://www.linkedin.com/company/snowy-mountain-development-corporation>. SMDC staff provide Media Releases to local newspapers and radio stations informing them of newsworthy project updates.

As a project of Fergus County, the On Your Way brownfield property is discussed at Fergus County Commission Board Meetings, all of which are noticed to the public via print and digital media. These bodies have discussed the On Your Way property on the following dates for the following reasons:

08/12/2015	Meeting to discuss ONY property noting it was still for sale
05/23/2016	Meeting with property neighbor, Dan Bartel, to sign Consent to Access Property
06/21/2016	Meeting with Fergus County Commissioners and attorney regarding the Letter of Intent
07/20/2016	Meeting to discuss donation of property by Yoak properties
07/22/2016	Meeting with Commission regarding Release document with Dan Bartell and review of 7/14/2016 DEQ Letter
08/22/2016	Meeting with Commission regarding appraisal and confirming eligibility of SMDC's RLF funds

09/8/2017 Fergus County Commission and Fergus County Attorney to discuss access agreement by Mr. Yoak

11/15/2017 Meeting with Fergus County Commissioners to received approval for Consent to Access properties

11/27/2017 Meeting with County, DEQ, potential purchaser, realtor and SMDC to discuss entire project, 2+ year process, and understanding of risks

12/11/2017 Meeting with Fergus County Commissioners and others regarding and securing approval for the site eligibility submission. Announcement that County took possession of property

01/18/2019 Receipt of Phase II Petroleum Assessment draft. Meeting to discuss data gaps, next steps and condition of building

06/07/2019 Conference call with all parties to discuss status of investigation and upcoming field activities

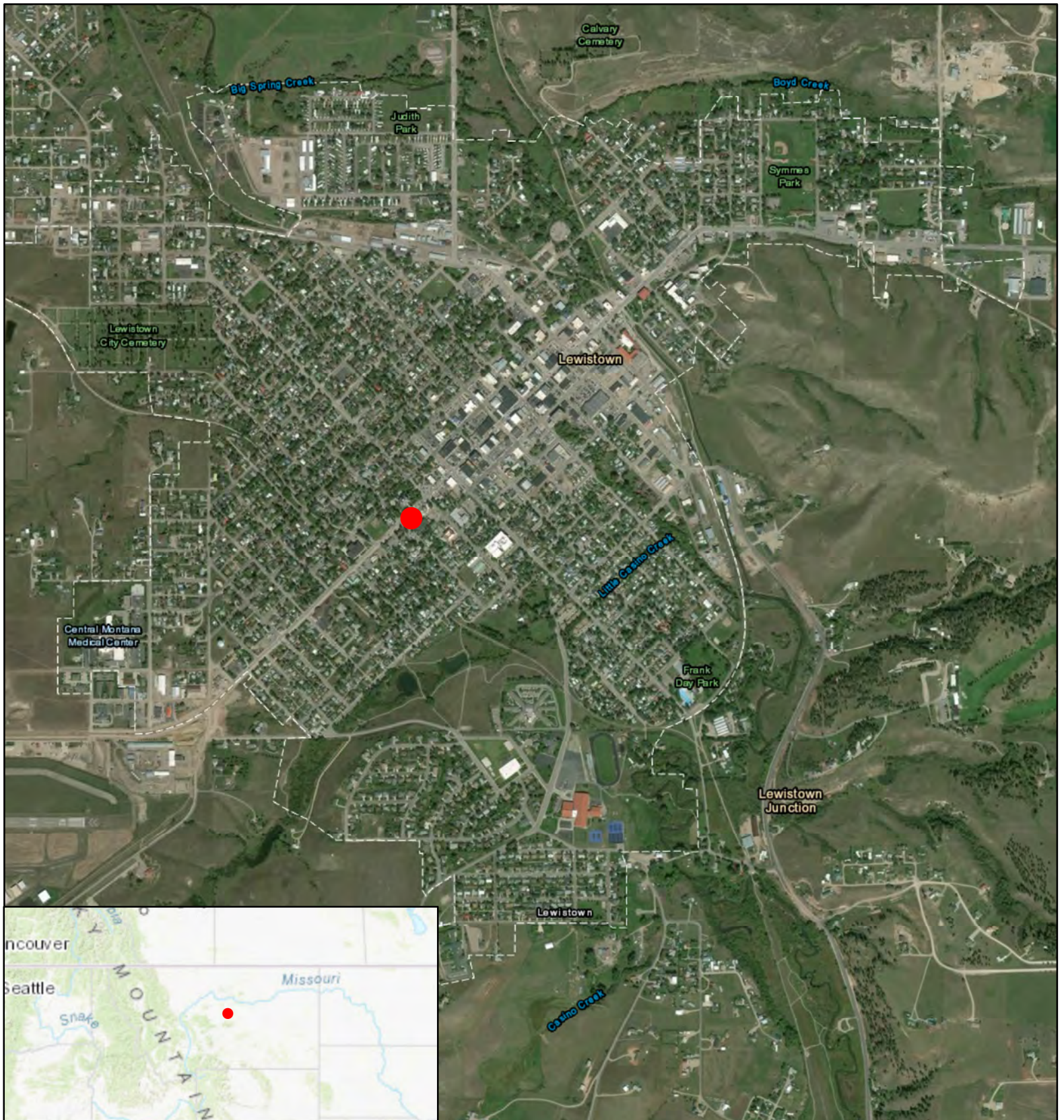
CONTACTS

Entity	Name	Title	Address	Phone Number	Email Address
Media Contact	Lewistown News- Argus	Advertising Department	521 W. Main P.O. Box 900 Lewistown, MT 59457	(406) 535-3401 1-800-879-5627	editor@lewistownnews.com
Town of Lewistown	Holly Phelps	City Manager	305 West Watson Lewistown, MT 59457	(406) 535-1760	hphelps@ci.lewistown.mt.us
State of Montana Fire Marshal	Sally McKenna	Deputy State Fire Marshal, Area 4	P.O. Box 31094 Billings, MT 59107	(406) 896-1094	smkenna@mt.gov
MDEQ	Jason Seyler	MT DEQ Brownfields Lead	P.O. Box 200901 Helena, MT 59620-0901	(406) 444-6447	jseyler@mt.gov
U.S. EPA	Greg Davis	Brownfields Project Manager	U.S. EPA, Region 8 1595 Wynkoop Street Denver, CO 80202	(303) 312-6184	greg.davis@epa.gov

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- United States Environmental Protection Agency (USEPA), 2002. *Groundwater Sampling Guidelines for Superfund and RCRA Project Manager – Attachment 3: Standard Operating Procedure for Low-Stress/Minimal Drawdown Groundwater Sample Collection*. May, 2002.
- WESTON® (WESTON Solutions, Inc.). 2019. *Remedial Investigation Report On Your Way Fuel Facility ID #14-09853, Release #3790, Lewistown, MT*. June 2019.

Figures



Legend

● Approximate Site Location

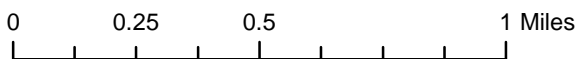
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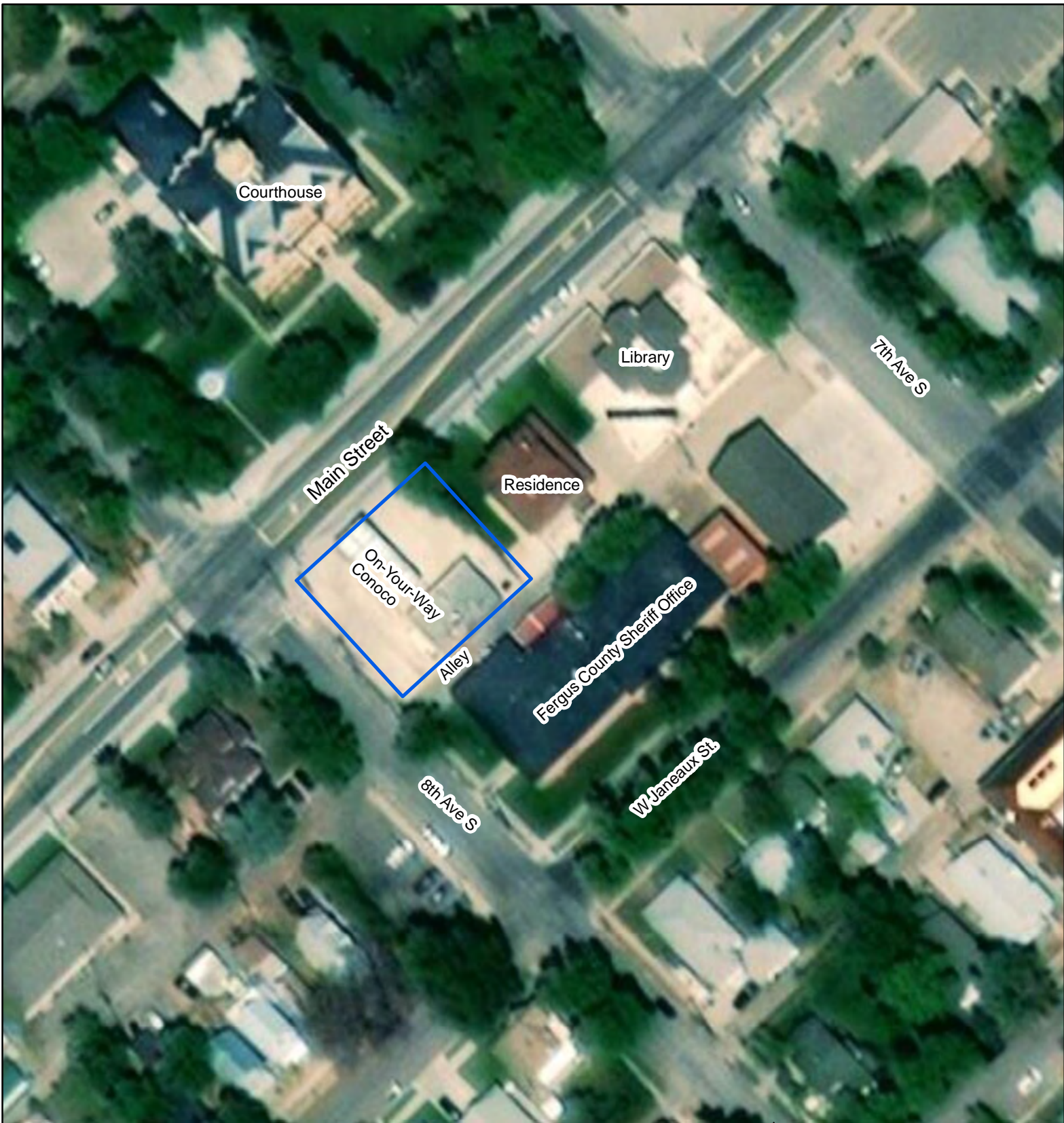


Prepared By:
 Weston Solutions, Inc.
 805 N. Last Chance Gulch
 Helena, MT 59601




Figure 1- Site Location Map
 On-Your-Way Conoco
 723 West Main
 Lewistown, MT

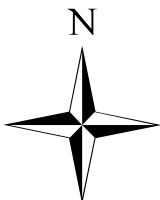




Legend

 Approximate Site Boundary

0 65 130 260 Feet



Prepared For:
 Snowy Mountain Development Corp.
 613 N.E. Main Street
 Lewistown, MT 59457



Prepared By:
Weston Solutions, Inc
 805 N. Last Chance Gulch
 Helena, MT 59601



Figure 2- Site Layout Map
 On-Your-Way Conoco
 723 West Main
 Lewistown, MT