

August 27, 2019

Ms. Shannon Cala  
Petroleum Tank Cleanup Section  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620

**Re: Revised Abbreviated Corrective Action Plan and Budget - Impacted Soil Removal  
Former On-Your-Way Conoco, 723 West Main, Lewistown, Fergus County, Montana  
Facility ID 14-09853, Release 3790, Work Plan ID 33895**

Dear Ms. Cala,

On behalf of Snowy Mountain Development Corporation (SMDC), Weston Solutions, Inc. (WESTON) is submitting the following Revised Abbreviated Corrective Action Plan (CAP) AC-07 to perform additional corrective work for Petroleum Release 3790 at the former On-Your-Way Conoco (Site) in Lewistown, Fergus County, Montana (Figure 1). WESTON has prepared this abbreviated CAP in response to a Montana Department of Environmental Quality (MDEQ) Additional Corrective Action and Work Plan Request Letter issued June 26, 2019, requesting additional corrective action at the site and discussion between MDEQ and WESTON on August 27, 2019.

**SCOPE OF WORK**

Previous soil and groundwater investigations at the site has indicated petroleum contamination exceeding MDEQ Risk Based Screening Levels (RBSL). To address the petroleum contamination at the site, the remedial action agreed upon by all stakeholders is to demolish and remove the existing vacant building, excavate petroleum-impacted soil from the Site, and transport the contaminated soil to the Lewistown Municipal Airport where it will be landfarmed until contaminant levels are below RBSLs. The proposed scope of work also includes backfilling and compacting the excavated area and preparing a report summarizing the corrective actions. In addition, groundwater monitoring at the Site and petroleum vapor intrusion (PVI) confirmation sampling at the adjacent residence will occur in the winter. A report will be prepared summarizing the results of the groundwater monitoring and PVI confirmation sampling. The following proposed tasks outlines the work activities to execute the scope.

**Task 1: Project Administration**

The WESTON project manager will provide project oversight, communicate with all stakeholders during the project, provide project updates to stakeholders, and work with stakeholders to determine a path forward when complications arise. The WESTON financial analyst will assist in opening and closing the project, and the WESTON procurement specialist will manage laboratory and third-party utility locate subcontracts throughout the project. The construction contractor (Contractor) will be under contract directly to SMDC. WESTON, as

SMDC's Qualified Environmental Professional (QEP), will be provided the latitude to work with SMDC's Contractor and direct fieldwork.

## **Tasks 2: Plan Preparation**

Prior to the start of field activities, WESTON will prepare an amendment to the *Sampling and Analysis Plan (SAP), Phase II Environmental Site Assessment, On Your Way Fuel*, dated May 2018. This amendment will address the confirmation sampling required for the excavation and other sampling requirements in support of the landfarm permit. Additionally, this amendment will identify deviations from the procedures and sampling requirements prescribed in the May 2018 SAP for the groundwater monitoring and PVI sampling. WESTON will also prepare a Site-Specific Health and Safety Plan (HASP), as required under Code of Federal Regulations 1910.120. The HASP will govern safety requirements during all work activities under this project. The Contractor's traffic control plan and dewatering plan will also be made available to all stakeholders prior to the start of field activities. The dewatering plan will only be implemented if warranted by field conditions.

All drafts will be submitted electronically to all stakeholders.

## **Task 3: Landfarm Permitting**

WESTON will be responsible for acquiring a one-time landfarm permit from MDEQ which allows for the landfarming of up to 2,400 cubic yards (cyds) of contaminated soil from a single source. WESTON will work with the appropriate stakeholders to identify a suitable location at the Lewistown Municipal Airport to stockpile and landfarm the contaminated soil from the excavation. WESTON will collect one background sample of native soils at the proposed landfarm location and analyze for benzene, toluene, ethylbenzene, and xylenes (BTEX), extractable Petroleum Hydrocarbons (EPH), volatile Petroleum Hydrocarbons (VPH) and Toxicity Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) Metals in accordance with MDEQ one-time landfarm guidelines. Results will be provided as part of the permit application, as required.

In order to meet the one-time landfarm permit application requirements, WESTON proposes to temporarily stockpile the contaminated soil at the airport and collect up to 12, 5-point composite samples to be analyzed for BTEX, EPH/VPH, and TCLP RCRA Metals to demonstrate the soils are not hazardous; these results will also be included as part of the permit application. A berm will be constructed around the stockpiled soil to control runoff. Clean fill from the Lewistown Municipal Airport (Opencut Permit Number 1435) will be used to construct the berm.

Based on historical soil data, it is assumed that the excavated soil will contain petroleum levels suitable for landfarming. Upon approval of the one-time landfarm license application by MDEQ, the soil will be spread no more than 6- inches thick at the designated landfarm location.

Field activities and sampling requirements associated with operation and maintenance of the landfarm will be addressed after the permit is approved.

#### **Task 4: Field Work (Demolish Building, Excavate and Transport Soil, Confirmation Sampling, Site Restoration)**

The work proposed for the 2019 field season include the demolition and disposal of the vacant building, excavation of contaminated soil, transport of the soil to the airport, confirmation soil sampling, and site restoration. WESTON intends to contract with Besel Construction, an OSHA 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) certified contractor, to complete the work. The following activities will be completed by WESTON's Contractor (unless otherwise designated) at the Site:

##### ***Demolition***

- a. Using results from the building hazard assessment conducted in May 2019, the appropriate remedial action(s) will be determined to address lead-based paint found on the door frame of the one-story 1,296 square foot (sf) vacant building;
- b. Demolish and remove the one-story vacant building; and
- c. Based on the sampling results, material will be disposed appropriately at an appropriate off-site licensed facility.

##### ***Excavate and Transport of Contaminated Soils***

The limits of excavation are currently defined by available historical soil data and are anticipated to be 16,589 sf (refer to Figure 2). Utility locate services will be obtained from the public utilities, as well as a third-party private utility locating service prior to the start of excavation. Excavation and transport activities will consist of:

- a. Demolish and remove asphalt/concrete within the limits of excavation. Materials will be disposed as non-hazardous waste at an off-site licensed facility;
- b. Excavate until all soil in the excavation footprint is below 50 parts per million (ppm) using heated headspace technique with a photo-ionization detector (PID) or the limits of excavation have been reached;
- d. If groundwater is encountered in the excavation, the dewatering plan developed by the Contractor will be executed; and
- e. Remove and sort up to 6,700 cyds of excavated soil. It is anticipated that up to 6,700 cyds of soil will be excavated from the 16,589 sf area. Of the 6,700 cyds of soil, it is assumed that a 4-foot zone of contaminated soil (or approximately 2,400 cyds) will be removed and transported to the designated area at the Lewistown Municipal Airport for landfarming. The remaining 4,300 cyds of clean soil will be stockpiled and used as backfill during site restoration.

The WESTON on-site field representative will note the total number of truckloads transported off-site and stockpiled at the airport to determine the total quantity of soil to be landfarmed. If the total volume of contaminated soil exceeds 2,400 cyds, the excess contaminated soil will be transported and disposed at a licensed solid waste disposal facility.

At this time, monitoring wells MW-2, MW-3, and potentially MW-6 and MW-9 are anticipated for removal during excavation activities. All well materials will be properly disposed at a licensed facility. WESTON will prepare well abandonment forms and submit the forms to Montana Department of Natural Resources and Conservation (DNRC).

### ***Confirmation Sampling***

Following the removal of contaminated soil from the Site, WESTON will collect confirmation soil samples from the floor and sidewalls of the excavation. The sidewalls and excavation floor will be gridded to allow for collection of at least one five-point composite sample per sidewall and at least one five-point composite for the excavation floor. Samples will be collected for each 625 square feet of excavation floor; one five-point composite sample will be collected and analyzed for VPH. Sidewall samples will be collected every 25 linear feet; one five-point composite sample will be collected and analyzed for VPH.

Soil samples will be submitted to Energy Laboratories Inc. in Helena, MT for analysis.

### ***Site Restoration***

The excavation will be backfilled with the stockpiled clean soil from the excavation and clean fill in accordance with Section 209.03.6 of the MT DOT Construction Specifications. Backfill material for the excavation will be sourced from either the Carter Gravel (Opencut Permit Number 1952) or the Lewistown Municipal Airport pit. Fill material will be compacted and compaction testing will be conducted as required. The County intends to use the Site as a parking area for the courthouse and sheriff's complex; therefore, the Site will be restored to a gravel surface prior to demobilization to allow for future construction of the parking lot by others.

### **Task 5: AR-04 Report Preparation**

Following the completion of excavation activities and receipt of the soil analytical results from the laboratory, WESTON will prepare and submit an Abbreviated Standardized Contaminated Soil Excavation and Disposal Report (AR-04) report to detail the cleanup activities and submit to MDEQ within 60 days. This report will include all the content outlined in the AR-04 and the following:

- a. Map(s) that identify the location of the excavation and sampling points;
- b. Field Data, laboratory analytical data, and Data Validation Summary Form(s) (DVSF); and
- c. A list of all groundwater monitoring wells that were removed during excavation activities. This reported list will be in-lieu of the standardized monitoring well abandonment forms.

All drafts will be submitted electronically to all stakeholders.

### **Task 6: GW Monitoring Event and PVI Sampling at the Residence**

WESTON will complete a PVI sampling event at the Residence, located at 713 West Main in Lewistown, Montana, during the heating season (Figure 3). WESTON will work with the

landowner in advance of the sampling event to fill out an Occupied Building Questionnaire to ensure that no possible sources of Volatile Organic Compounds (VOCs) are present in the home during sampling. WESTON will contract with a third-party private utility locating service to locate utilities at the Residence prior to PVI sampling. This PVI sampling event will include three 24-hour indoor air samples (includes one (1) duplicate), one 24-hour ambient air sample, and one sub-slab air grab sample. All samples will be analyzed for TO-15 SIM Scan and APH [Aliphatic (C5-C8), Aliphatic (C9-C12), Aromatic (C9-C10)]. Samples will be sent to Pace Analytical Laboratory in Billings, MT for analysis.

WESTON will also complete one groundwater sampling event concurrent with the PVI sampling event. Field parameters from each well, to include pH, dissolved oxygen, specific conductivity, temperature, and oxidation-reduction potential will be measured and recorded prior to sample collection.

Groundwater samples will be collected from wells MW-7, MW-9 (if not removed during excavation), MW-10, and MW-11. Samples will be sent to Energy Laboratories Inc. in Helena, MT and analyzed for VPH.

**Task 7: AR-07 Report Preparation**

Following the GW sampling event and PVI sampling at the Residence, WESTON will prepare and submit an Abbreviated Standardized General Applications Report (AR-07) for submission within 60 days. An updated Release Closure Plan (RCP) will be included as an appendix with the report. This report will include the content outlined in the AR-07 format and the following:

- a. Map(s) that identify the locations of the vapor sampling points;
- b. Field Data, laboratory analytical data, and Data Validation Summary Form(s) (DVSF); and
- c. A completed Occupied Building Questionnaire.

All drafts will be submitted electronically to all stakeholders.

## SCHEDULE

The table below is the proposed schedule for project tasks and expected project completion dates. If an alternate delivery date is required, WESTON will request it in writing, and the extension may be agreed to in writing by MDEQ.

<b>Task</b>	<b>Completion Date</b>
Task 1: Project Administration	August 2019 through Project Completion
Tasks 2: Site-Specific HASP, Amended SAP, Dewatering and Traffic Control Plan	September 2019
Task 3: Landfarm Permitting	September/October 2019
Task 4: Field Work (Demolish, Excavate, Transport, Sampling, and Site Restoration)	September/October 2019
Task 5: AR-04 Report Submission	December 2019 or 60 days upon completion of Task 4
Task 6: GW and PVI Sampling	November or December 2019
Task 7: AR-07 Submission	January 2019 or 60 days upon completion of Task 6

Enclosed with this report is a proposed estimated budget.

Respectfully submitted,

Owena Yang-Totorica  
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Enclosures

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## **FIGURES**

