Montana Department of
ENVIRONMENTAL QUALITY
Judy Martz, Governor

P.O. Box 200901 • Helena, MT 59620-0901 • (406) 444-2544 • www.deq.state.mt.us

July 29, 2004

William Fulton
Fulton Fuel Company
PO Box 603
Shelby, MT 59474

Re: Fulton Crude Oil Release into Fred and George Creek, Toole County, Montana (CVID #7972)

Dear Mr. Hesla:

The Montana Department of Environmental Quality (DEQ) has reviewed the July 15, 2004 Remedial Investigation (RI) Work Plan prepared by HydroSolutions Inc. (HSI) on your behalf. Thank you for submitting this work plan for DEQ's review and approval. The work plan describes soil, sediment, and water samples that will be collected to determine the extent and magnitude of crude oil contamination at the site. DEQ has the following comments and requirements:

1. Page 5, first paragraph: Please describe how the transect locations were chosen. If these transects are not going to be representative of worst-case areas, DEQ requires collection of at least three additional soil samples from "worst case" areas, based on staining. It may be possible to insert the soil probe horizontally to determine the depth to which the crude soaked into the soil. Collect samples from both stained and unstained soil. This will determine worst-case contamination concentrations, and will indicate whether removal of visually stained soil will adequately mitigate contamination.
2. Page 5, third paragraph: At least one in-stream streambed sediment sample should be analyzed to total organic carbon (TOC). Some sediment quality benchmarks are presented in terms of organic-carbon-normalized concentrations of contaminants, and TOC is necessary to calculate these values. TOC of the sediment may also be useful if site-specific sediment quality values need to be developed for this site.
3. Page 6, second paragraph: DEQ does not disagree with the plan for sequential sample analysis, however, care should be taken to prevent holding times from being exceeded.
4. Page 6, third paragraph: Water and soil/sediment samples must be collected from downstream to upstream. Water samples should be collected before soil/sediment samples to prevent cross-contamination and excess turbidity.
5. Page 6, third paragraph: Analytical methods for surface water were not specified in this paragraph. Water samples must be analyzed for Extractable Petroleum

Exhibit 5

Hydrocarbon (EPH) screen and Volatile Petroleum Hydrocarbons (VPH). If the EPH screen produces a Total Extractable Hydrocarbon (TEH) value that exceeds 300 ppb, then the samples must be further analyzed for EPH fractions and polynuclear aromatic hydrocarbons by Method 8270.

6. Page 7, Potential Receptor Survey: If potential receptors are identified and sampled, samples should be analyzed for EPH screen in addition to VPH. EPH fractions and PAHs should be analyzed as described in #4 (above), if appropriate.

7. General comment: Please be aware that DEQ's Risk-Based Screening Levels (RBSLs) are applicable to soil and groundwater. Compare results for surface water to the most conservative of the various levels set forth in DEQ's Circular WQB-7 Montana Numeric Water Quality Standards guidance. Compare sediment (streambed) results to Washington Department of Ecology Freshwater Sediment Quality Values and USEPA ecotoxicity thresholds.

8. During fieldwork, note the presence or absence of aquatic organisms, including invertebrates, at the various sample locations.

DEQ approves the work plan with the above comments as an addendum. Please keep me posted regarding sampling dates, as I may be available to attend.

Please contact me at (406) 841-5062 or lalvey@state.mt.us if you have any questions concerning the requirements of this letter.

Sincerely,

Laura Alvey

Laura Alvey
Groundwater Remediation Program
Remediation Division

cc: Jane Amdahl, DEQ Legal Unit
Chad Anderson, DEQ Enforcement Division
Toole County Sanitarian, 226 1st Street South, Shelby, MT 59474
Sarah Shepherd, Toole County Conservation District, 1125 Oilfield Avenue, Shelby, MT 59474
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