



April 24, 2018

May Trucking Company
4185 Brooklake Road NE
Salem, OR 97303

Via email: info@maytrucking.com

RE: Comments on the cleanup report submitted for the December 13, 2017 diesel fuel spill in Gallatin County, Montana [CVID 20328]

To Whom It May Concern:

The Enforcement Program (ENF) of the Montana Department of Environmental Quality has reviewed the “*Cleanup and Assessment Report-May Trucking Fuel Release*” (Report), received April 10, 2018, summarizing assessment and remedial activities conducted in response to the above-referenced incident. The Report was prepared by and submitted on behalf of May Trucking Company (May) by Best Rate Towing and Repair, Inc. (Best Rate).

The following comments and requested actions are based on review of the information provided in the Report.

Comment 1: The Report was submitted to ENF as 11 attachments using the Montana File Transfer Service. *Please resubmit the revised Report electronically as one document in .PDF format.*

Comment 2: In Section 2.0, the contact information for NWFF Environmental has a website listed as an email address. *Please provide an email address for the contact at NWFF Environmental. Additionally, please provide the name and email address for the contact at May.*

Comment 3: Section 5.0 (A) notes that the control sample collected contained preexisting hydrocarbons. The site map submitted indicates that the control sample was collected from the surface, which would not be relevant for use as a control (background) sample. *If a background sample is collected again, it should be collected from a different location no more than 25 feet from the impacted area and at the same approximate depth as where the confirmation samples were collected from the excavation.*

Comment 4: The Sampling Activities Report Section does not provide a description of how samples were collected (grab samples or composite samples). *Please refer to Section 6. of ENF’s Standardized Cleanup Report Guidance document and include a discussion on how confirmation soil samples were collected. Also, please refer to ENF’s Soil Sampling Guidance for information on the types (composite vs. discrete or grab) and number of required samples to be collected, as well as laboratory analytical methods to be conducted on soil samples. Note that composite sampling is not allowed for volatile petroleum hydrocarbon (VPH) analysis.*

The confirmation soil samples collected by Best Rate on January 2, 2018, were received by Energy Laboratories on January 5, 2018. The samples arrived at Energy Laboratories with a temperature of 7.1 °C with no ice. The confirmation soil samples collected on February 27, 2018 were received by Energy Laboratories on March 1, 2018. The samples arrived at Energy Laboratories with a temperature of 7.8 °C with no ice.

ENF applies the RBCA Guidance Document when evaluating petroleum release or spill sites for closure, Table C of the RBCA Guidance contains the Sampling and Preservation Protocols. In this instance, the confirmation soil samples were required to be preserved to a temperature of 4 °C. Section 7 of the ENF Standardized Cleanup Report guidance document states that “Samples that arrive at the laboratory with a sample temperature greater than 4 °C may result in ENF invalidating the sample analytical data.” *Because resampling of the spill site is required, please ensure that all collected confirmation soil samples are properly preserved.*

Comment 5: The Report states that frozen dirt in the bucket of the excavator and the frozen ground likely caused cross-contamination; this may have occurred if the sampling was done from the bucket. *Collecting soil samples from the backhoe bucket is discouraged, especially when the excavation is relatively shallow. If confirmation soil samples must be collected from the backhoe bucket, extra care should be taken when collecting samples so to avoid cross contamination. There are methods to safely collect samples from a backhoe bucket to minimize or eliminate the risk of cross contaminating soil sample.*

Comment 6: From review of the Report and sample analytical results, it appears that only seven (7) confirmation soil samples were collected from the excavation. Based on the total size and depth of the excavation, ENF believes that a minimum of five (5) composite soil samples should have been collected and submitted for extractable petroleum hydrocarbon analysis (EPH). A minimum of ten (10) sidewall and base samples needed to be collected and analyzed for volatile petroleum hydrocarbons (VPH), especially if any remaining contamination is over the Risk-based Screening Levels (RBSLs). *Please refer to ENF’s Soil Sampling Guidance to determine the appropriate number and types of confirmation soil samples to be collected.*

Comment 7: The Report refers to tables in Section 7.0 for the Sample Analytical Results. A discussion must be included in this Section and not a referral to tables. *Please refer to Section 7 in ENF’s Standardized Cleanup Report for the type of information to be provided in the resubmitted Report.*

Comment 8: Section 9.0, Conclusion and Recommendations, discusses that the analytical results show the bulk of the spill has been removed, taking in consideration the pre-existing hydrocarbons. *As previously noted, the analytical results for the Control Sample are not accepted because it was collected from the surface and cannot be considered a true background. Because the site will need to be resampled, Section 9.0 of the Report should be revised accordingly. Should contamination exceeding applicable RBSLs remain, the remaining contamination should be analyzed to determine if the contamination is historic or from the recent spill.*

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Comment 9: While photographs (extremely small) were provided in an attachment, no photo log or descriptions of photos were included in the Report. *Please see Section 11 of the ENF Standardized Report Format for guidance on preparing photologs and include in the resubmitted Report.*

Comment 10: The analytical tables in the Report for EPH and VPH do not have the applicable RBSLs listed; *please include this information when requesting that a site be closed based on the laboratory results. The ENF Standardized Report Format has an example table for your reference.*

For this spill site to be considered for closure, ENF is requesting that the following activities be conducted:

By May 25, 2018, re-collect the confirmation soil samples per ENF's Soil Sampling Guidance document. All samples are to be collected in native soils in the same approximate locations and depths plus 0.5 inches below or adjacent to the fill material in the excavation. All samples are to be preserved to a temperature of 4 °C and received at the analytical laboratory with sufficient time for the laboratory to process, preserve and extract the samples within the required holding times.

Samples should be collected in accordance with ENF Soil Sampling Guidance. All collected samples are to be analyzed for EPH and VPH per the ENF Soil Sampling Guidance.

By June 25, 2018, submit a cleanup report containing all elements of ENF's Standardized Cleanup Report Format.

The Standardized Cleanup Report and ENF Soil Sampling Guidance can be accessed on ENF's web site under Policy and Resources at: <http://deq.mt.gov/DEQAdmin/ENF>.

If you have questions related to this matter please contact me at the telephone number or email address listed below.

Sincerely,



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