



July 13, 2016

To Whom It May Concern:

The Department of Environmental Quality (DEQ) is accepting public comments on new underground storage tanks to be installed in Missoula, Montana.

DEQ has prepared the following Environmental Assessment (EA) as required by the Montana Environmental Policy Act (sections ARM 17.4.607(2) and ARM 17.4.609(2)). This project involves installing one 25,000-gallon single-compartment Xerxes Fiberglass Reinforced Plastic (FRP) double-walled Underground Storage Tank (UST) and one 30,000 gallon FRP dual-compartment UST. The single-compartment UST system will have the capacity to store 25,000-gallons of E10 Unleaded Gasoline. The 30,000-gallon dual-compartment tank will have the capacity to store 15,000 gallons of E10 Premium Unleaded Gasoline and 15,000 gallons of #2 Diesel. All of the UST systems will utilize secondarily contained Nupigeco flexible plastic piping. This project will add three new UST systems for the newly-developed Town Pump Missoula 9 site. This new UST facility will be located at 2001 Brooks Street, Missoula, MT 59808.

Specific installation plans include the following materials and monitoring systems: Tanks: This project involves installing one 25,000-gallon Xerxes FRP double-walled UST and one 30,000 gallon Xerxes FRP double-walled UST. All tanks will be utilized by Troy Town Pump Inc. as a petroleum re-fueling site. Piping: All product piping associated with this project will be double-walled Nupigeco pipe. Approximately 845 feet of double-walled Nupigeco product piping will be utilized in this project. Sumps: Nupi Americas HDPE under-dispenser containment sumps and Xerxes tank-top sumps will be installed. Tank and piping system monitoring will be accomplished via internal tank probes and interstitial tank sensors, as well as continuous sensor monitoring in all containment sumps and electronic line leak detection for all of the piping. A Veeder Root TLS-450 Plus Automatic Tank Gauge (ATG) will continuously monitor all operational parameters.

DEQ prepares EAs to inform interested government agencies, public groups, or individuals of a proposed action and to determine whether the action may have a significant effect on the human health or natural environment. After the ten-day comment period, DEQ will decide what action to take regarding this proposed project.

If you care to comment on this proposed project or the attached EA, please write or email the Waste Management and Remediation Division. Comments must be in writing and must be received by June 26th, 2016. Our email address is dequstprogram@mt.gov and our mailing address is PO Box 200901, Helena, MT 59620-0901.

Sincerely,

Wally Jemmings, Environmental Science Specialist
Underground Storage Tank Section
Waste and Underground Tank Management Bureau

Enc: Environmental Assessment

O/O NAME: Troy Town Pump Inc.	FACILITY NO: 60-15288
PERMIT NO: 16-0238	DATE OF APPLICATION: May 31, 2016
PERSON PREPARING EA: Wally Jemmings	COUNTY: Cascade
LOCATION: 2001 Brooks Street, Missoula, MT 59808	
FACILITY NAME: Town Pump Missoula 9	EA COMPLETED: 7/11/2016
<p>DESCRIPTION OF PROPOSED ACTION: <u>Tanks:</u> This project involves installing one 25,000-gallon Xerxes FRP double-walled UST and one 30,000 gallon Xerxes FRP double-walled UST. All tanks will be utilized by Troy Town Pump Inc. as a petroleum re-fueling site. <u>Piping:</u> All product piping associated with this project will be double-walled Nupigeco pipe. Approximately 845 feet of double-walled Nupigeco product piping will be utilized in this project. <u>Sumps:</u> Nupi Americas HDPE under-dispenser containment sumps and Xerxes tank-top sumps will be installed. Tank and piping system monitoring will be accomplished via internal tank probes and interstitial tank sensors, as well as continuous sensor monitoring in all containment sumps and electronic line leak detection for all of the piping. A Veeder Root TLS-450 Plus Automatic Tank Gauge (ATG) will continuously monitor all operational parameters.</p> <p>Products to be stored: E10 Unleaded Gasoline, E10 Premium Unleaded Gasoline, and #2 Diesel.</p>	
<p>DESCRIPTION OF THE BENEFITS AND PURPOSE OF THE PROPOSED ACTION: Purpose is to install three new petroleum UST systems for storing and dispensing gasoline and diesel at Town Pump Missoula 9, creating a new petroleum re-fueling station. The benefits include efficient access to fuel.</p>	

- A: Significant unavoidable impacts
- B: Potential significant impacts mitigated based upon license conditions
- C: Insignificant as proposed

PHYSICAL ENVIRONMENT	POTENTIAL IMPACTS					
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
1. <u>TOPOGRAPHY:</u> Are there unusual geologic features? Will the surface features be changed?			X			This site is on the same block as the Fairway Shopping Center. The location is currently a flat lot located approximately 1,500 feet Northeast of the Missoula County Fairgrounds. The physical address is 2001 Brooks Street, Missoula, MT 59808. There are no known or reported unusual geologic features. All tanks and product piping will be buried underground, while appurtenant equipment is above ground. The general topography will not change. Surface features will be consistent with retail petroleum re-fueling facilities.

<p>2. <u>GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE</u>: Are fragile, compactable or unstable soils present? Are there special reclamation considerations?</p>			X		<p>There are no known special reclamation considerations for the project site, nor were any fragile or unstable soils identified to the reviewer.</p>
<p>3. <u>WATER QUALITY, QUANTITY AND DISTRIBUTION</u>: 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?</p>		X			<p>Important water resources are not present at this proposed location.</p> <p>There are approximately 73 public and private water wells within 1 mile of the proposed site.</p> <p>There is no surface water within 100 feet of the proposed underground storage tank installation.</p> <p>Pattee Creek is located within approximately 1.0 mile to the southeast. The Clark Fork River is located approximately 1.5 miles to the northeast. The Bitterroot River is located approximately 2.5 miles to the southwest.</p> <p>The proposed site lies within Middle Clark Fork watershed, the Clark Fork River-Rattlesnake Creek sub-watershed, and the Clark Fork-Marshall Creek sub-watershed.</p> <p>The proposed site lies within the Northwest 5 Conservation District and the Bitterroot TPA TMDL Planning Area.</p> <p>Potential violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality is mitigated by secondarily contained non-corroding underground tanks/piping and continuous system monitoring.</p> <p>Improper operation of this system would increase the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, and the degradation of water quality. Secondarily containment and leak detection systems serve to mitigate the potential impacts by immediately reducing the amount of fuel available for release to the environment.</p>
<p>4. <u>AIR QUALITY</u>: Will pollutants or particulate be produced? Is the project influenced by air quality regulations or zones (Class I airshed)?</p>			X		<p>Petroleum vapors will be released at this site. Natural air currents and submerged fill pipes will control hydrocarbon vapors. The proposed project site is not located in a Class I airshed. The proposed project site is located near the following Class I airsheds: Selway-Bitterroot National</p>

						Wilderness Area (approximately 12 miles), Flathead Native American Reservation (approximately 15 miles), and Mission Mountain National Wilderness Area (approximately 20 miles).
5.	<u>DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY:</u> Will the project use resources that are limited in the area? Are there other activities nearby that will affect the project?			X		This project will not use existing environmental resources in the local area. There is no other nearby activities identified to the reviewer that may be impacted.
6.	<u>IMPACTS ON OTHER ENVIRONMENTAL RESOURCES:</u> Are there other studies, plans or projects on this tract?			X		There are no other known environmental studies or projects on this land.
7.	<u>TERRESTRIAL, AVIAN, AND AQUATIC LIFE AND HABITATS:</u> Is there substantial use of the area by important wildlife, birds or fish?			X		No known use of this project site by important wildlife, birds or fish has been identified to the reviewer. Critical Canada Lynx habitat and critical Bull Trout habit are both located within 6 miles of this project site.
8.	<u>VEGETATION COVER, QUANTITY AND QUALITY:</u> Will vegetative communities be permanently altered? Are any rare plants or cover types present?			X		Montana Cadastral lists this location as Property Type CU - Commercial Urban. No rare plants or cover types are reported to this reviewer.
9.	<u>UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES:</u> Are any federally listed threatened or endangered species or identified habitat present? Any wetlands? Any species of special concern?			X		There are six threatened species listed for Missoula County: Yellow-billed Cuckoo, Red Knot, Bull Trout, Water Howellia, Grizzly Bear, and Canada Lynx. There are 64 animal species of concern and 47 plant species of concern identified in Missoula County.
10.	<u>HISTORICAL AND ARCHEOLOGICAL SITE:</u> Are any historical, archeological or paleontological resources present?			X		The National Register of Historic Places lists 86 National Historic Landmarks within Missoula County. 73 National Historic Landmarks are located in the Missoula vicinity. There are no listed structures at the project site. There are no known archeological or paleontological resources reported to the reviewer.
11.	<u>AESTHETICS:</u> Is the project on a prominent topographical feature? Will it be visible from populated or scenic areas? Will there be excessive noise, light or odors?		X			This proposed project is aesthetically compatible with the land use of the project site. Tanks and piping will be buried underground. Appurtenant above ground equipment will be visible but it is consistent with the existing character of the adjacent commercial urban land properties.
12.	<u>AGRICULTURE:</u> Will grazing lands, irrigation waters or crop production be affected?			X		The property's status as Commercial Urban will remain the same. No significant impacts to agricultural lands are anticipated by this project.

HUMAN ENVIRONMENT						
1.	<u>SOCIAL STRUCTURES AND MORES:</u> Is some disruption of native or traditional lifestyles or communities possible?		X			It is not anticipated that the project will disrupt native or traditional lifestyles or communities.
2.	<u>CULTURAL UNIQUENESS AND DIVERSITY:</u> Will the action cause a shift in some unique quality of the area?		X			It is not anticipated that the project will cause a shift in any unique quality of the area.
3.	<u>DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING:</u> Will the project add to the population and require additional housing?		X			It is not anticipated that the project (re-fueling station) will add to the population or require additional housing.
4.	<u>HUMAN HEALTH & SAFETY:</u> Will this project add to health and safety risks in the area?	X				It is anticipated that natural air currents and tank vents will dissipate hydrocarbon vapors to a safe level. Leak detection equipment is designed to detect releases before serious health or safety problems occur. Improper operation of this system could impact human health and safety. Leak detection systems and operating requirements mitigate this potential impact by immediately reducing the amount of fuel available to be released into the environment where it could impact health and human safety.
5.	<u>COMMUNITY & PERSONAL INCOME:</u> Will the facility generate or degrade income?	X				The project result (re-fueling station) is anticipated to have limited potential to generate community and personal income in the local area.
6.	<u>QUANTITY AND DISTRIBUTION OF EMPLOYMENT:</u> Will the project create, move or eliminate jobs? If so, estimate jobs.	X				It is not anticipated that this project (re-fueling station) will create jobs, eliminate jobs, or generate additional income in the local area.
7.	<u>LOCAL AND STATE TAX BASE REVENUES:</u> Will the project create or eliminate tax revenue?	X				It is not anticipated that the (re-fueling station) associated with this proposal will generate additional local and state tax revenue.
8.	<u>DEMAND FOR GOVERNMENT SERVICES:</u> Will substantial traffic be added to existing roads? Will other services (fire protection, police, schools, etc.) be needed?	X				It is not anticipated that this proposed project will add to the local traffic flow on this section of Brooks Street. Other required services will be minimally impacted as a result of this project.

9.	<u>INDUSTRIAL, COMMERCIAL AND AGRICULTURAL ACTIVITIES AND PRODUCTION</u> : Will the project add to or alter these activities?			X			No significant impacts to adjacent commercial or agricultural activities are anticipated that are related to this project.
10.	<u>ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES</u> : Are wilderness or recreational areas nearby or accessed through this tract? Is there recreational potential within the tract?			X			This proposed project site is surrounded by the Lolo National Forest. No designated USFS recreational properties are located within the project area. It is not anticipated that this project site has recreational potential.
11.	<u>AESTHETICS</u> : Is the project on a prominent topographical feature? Will it be visible from populated or scenic areas? Will there be excessive noise, light or odors?			X			Tanks and piping are to be buried underground. It is not anticipated that this project will change the aesthetics of the area significantly. The result of the project (re-fueling station) is consistent with the aesthetics of other properties in the area.
12.	<u>LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS</u> : Are there state, county, city, USFS, BLM, tribal, etc., zoning or management plans in effect?			X			There are no known local, county, state, or federal environmental management plans that would impact this project development. The proposed project and associated development is expected to be in conformance with current Missoula and Missoula County zoning requirements.
13.	<u>TRANSPORTATION</u> : Will the project affect local transportation networks and traffic flow?			X			This project is expected to minimally affect immediately adjacent local transportation networks.

PUBLIC INVOLVEMENT: The department has attempted to identify parties who may be interested in this proposed project and to provide the opportunity for public comment. A copy of this Environmental Assessment has been posted on our website at <http://deg.mt.gov/Land/ust/ea> . Substantive comment may be provided to our email address at degustprogram@mt.gov.

ALTERNATIVES CONSIDERED: No other alternatives were presented or considered.

COMPLIANCE STATUS: This project, as permitted, will be in compliance with the UST regulations. The facility must, however, be operated and maintained in accordance with the UST rules and regulations. This facility is required to have a compliance inspection done within 120 days of the installation of the tank systems.

RECOMMENDATIONS CONCERNING PREPARATION OF AN EIS: Not necessary at this time, based upon the information reviewed. The project, as proposed with mandatory operating and permit conditions, will not have a significant environmental impact.

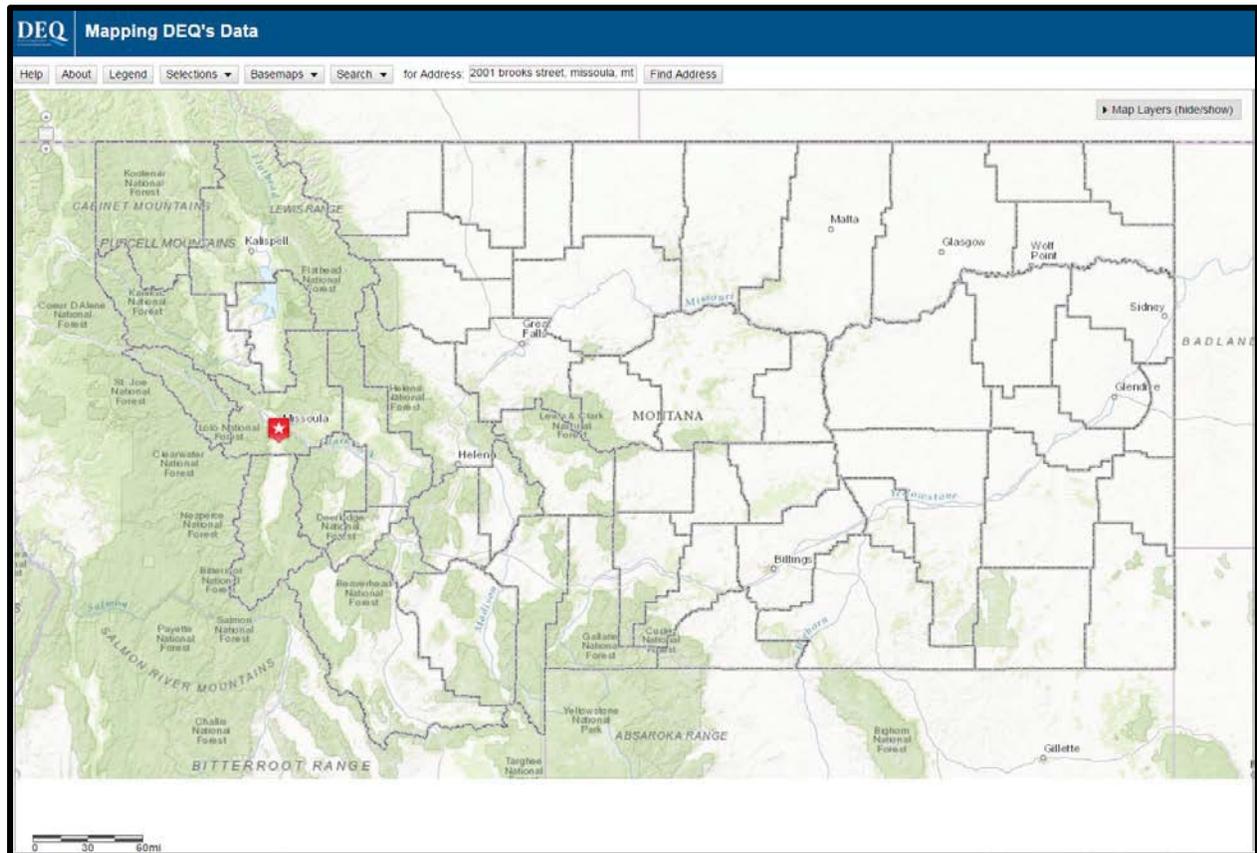
OTHER GROUPS OR AGENCIES CONTACTED OR WHICH MAY HAVE OVERLAPPING JURISDICTION: The Montana Department of Natural Resources and Conservation, The Montana Department of Justice, and the State Fire Marshall's Office.

INDIVIDUALS OR GROUPS CONTRIBUTING TO THIS EA: The owner, the contractor, and the preparer of this EA.

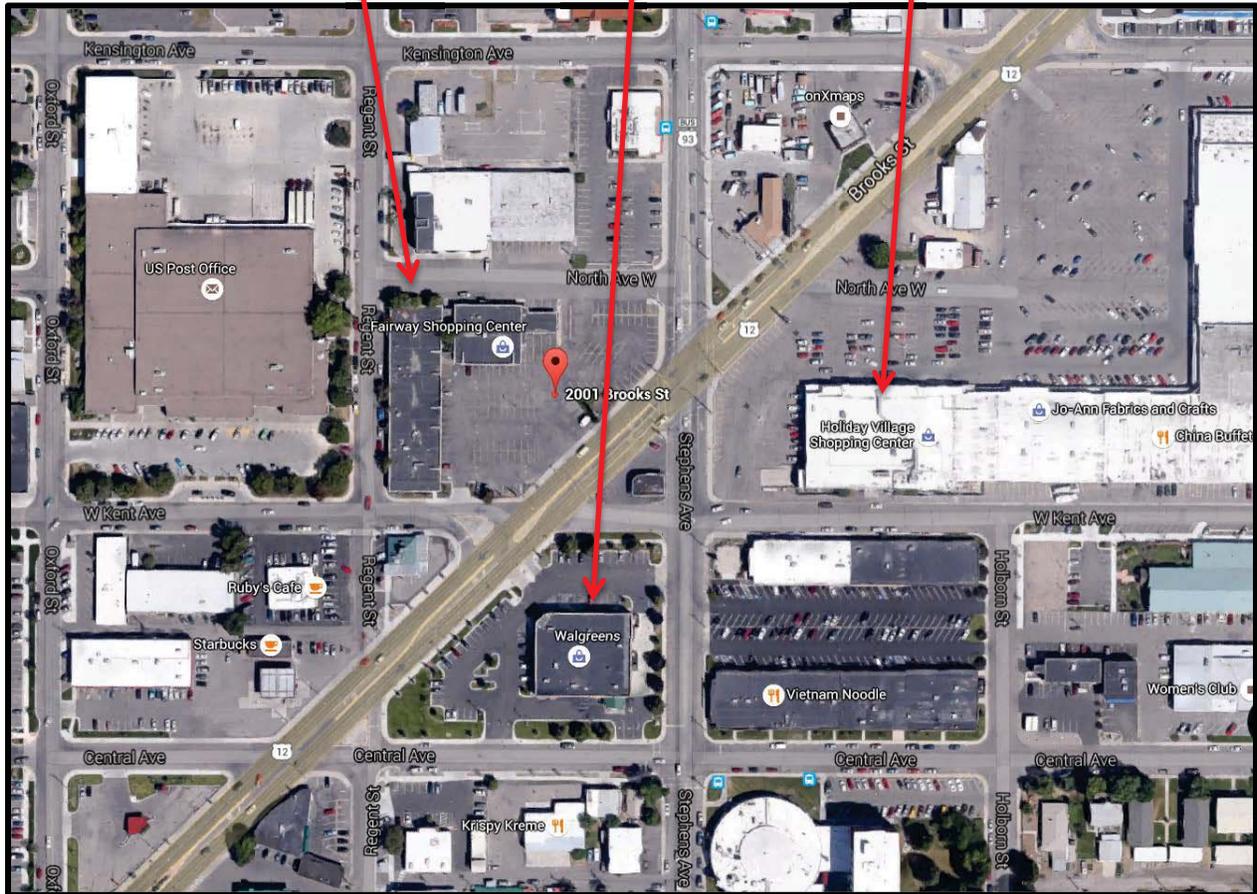
PERMIT CONDITION EFFECTS: Permit conditions are based on Montana and federal regulations, PEI RP100-2000 and accepted standard engineering practices.

cc: Governor's Office
Legislative Environmental Policy Office

General Location of Project Site:



Detailed Project Site Location: Fairway Shopping Center, Walgreens, Holiday Village Shopping Center



Proposed Project Site Physical Address: 2001 Brooks Street, Missoula, MT 59808