



January 31, 2019

Certified Mail
7006 2150 0001 5296 1397

Joe Dauner
Environmental Manager
Calumet Montana Refining, LLC
1900 10th Street N.E.
Great Falls, MT 59404

RE: AOC #16 - 2019 Interim Measures Work Plan

Dear Mr. Dauner:

The Montana Department of Environmental Quality (DEQ) reviewed Calumet Montana Refining, LLC's (CMR) document *AOC #16 Interim Measures Report Addendum* (Report). The Report is dated August 2, 2018.

DEQ and CMR had a conference call on January 17, 2019, and we discussed interim measures at AOC #16. DEQ understands CMR will be submitting additional information in February 2019. The submittal will include information from work regarding the city/county storm sewer.

To date, investigative work documents petroleum contamination in soil and groundwater. CMR is currently recovering NAPL at AOC #16. However, no remedial action has been taken to address groundwater contaminated with dissolved phase constituents.

Groundwater sampling and analytical results document contamination south of CMR's property boundary. Groundwater includes hazardous constituents above Montana numeric water quality standards set forth in Circular DEQ-7.

DEQ believes additional interim measures are necessary, given the magnitude of contamination and the proximity of AOC #16 to the Missouri River. DEQ will require additional corrective action to address source and dissolved phase groundwater contamination.

In accordance with condition VIII.B. Corrective Action Order on Consent #MHWCAO-12-01 (Order), DEQ is requiring CMR to submit an Interim Measure Work Plan. The Interim Measures Work Plan is due within thirty calendar days of receipt of this letter.

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In accordance with condition XI of the Order, CMR must continue to submit monthly progress reports regarding AOC #16.

If you have any questions regarding this letter, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Denise A. Kirkpatrick". The signature is written in a cursive style with a large, looped initial "D" at the end.

Denise A. Kirkpatrick
Hazardous Waste Specialist
Waste and Underground Tank Management Bureau
(406) 444-3983
email: dkirkpatrick@mt.gov

cc: Jesse Newland, USEPA Region 8, Newland.Jesse@epa.gov
facility file: Montana Refining Company, Corrective Action, File #35