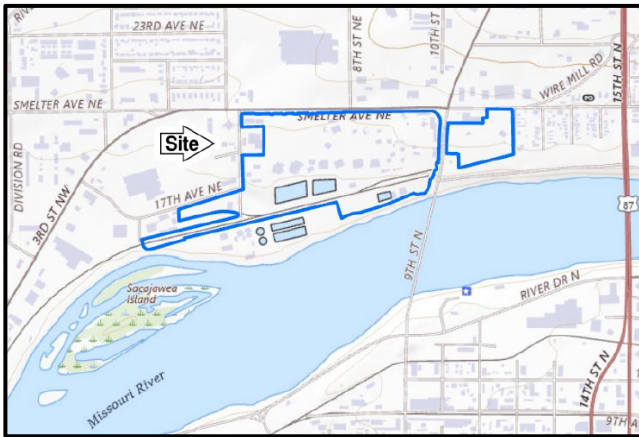


CMR is providing this fact sheet to explain investigation activities at the site, but it is not a technical document.

Introduction

The purpose of this document is to provide an update to the public and residents that live near Calumet Montana Refining, LLC (CMR) located at 1900 10th Street N.E. Great Falls, Montana (as shown below). A summary of the ongoing Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) activities at the Site are described in this Fact Sheet.



Site History

The site has operated as a refinery since 1922 under numerous owners/operators. Between 1979 to 1985 a land treatment unit (LTU) was operated at the Site to treat petroleum impacted wastes. The LTU was considered a regulated unit under the Montana Hazardous Waste Act and federal RCRA and required a hazardous waste permit.

The facility was issued hazardous waste permit MTHWP-95-02 on September 22, 1995. The permit was issued jointly by the Montana Department of Environmental Quality (MDEQ) and the United States Environmental Protection Agency (USEPA) and included requirements for post-closure care of the LTU and for facility-wide corrective action.

In September 2012, hazardous waste permit MTHWP-95-02 was terminated and a Corrective Action Order on Consent (Order) was issued by MDEQ to oversee the clean-up of the Site. The Order identified a total of 34 Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). SWMUs are areas where solid waste was historically placed and AOCs

are areas where a release of a hazardous waste occurred (or is suspected to have occurred), which may present an unacceptable risk to the human health and/or the environment. SWMUs and AOCs may have been impacted by hazardous wastes, spilled or released products, or other materials handled on-site. Since 2012, additional SWMUs and AOCs have been identified.

CMR acquired the refinery in 2012 and currently produces approximately 15,000 barrels a day of various petroleum products, in addition to approximately 15,000 barrels a day of renewable fuels from non-petroleum feedstocks on behalf Montana Renewables, LLC. The site occupies approximately 69 acres.

RCRA Facility Investigation

As part of the facility-wide corrective action, CMR is required to complete an RFI, with the purpose of gathering enough information to characterize the nature and extent of site-related contamination and to assess the risk to human health and the environment that any contamination poses. Key RFI focus areas target the characterization of Light Non-Aqueous Phase Liquids (LNAPLs) present in the subsurface, natural and man-made preferential contamination migration pathways, groundwater migration pathways from CMR to the Missouri River, and the occurrence and effectiveness of nature's own microbiologically driven Natural Source Zone Depletion (NSZD) mechanisms.

The RFI is an iterative process that is conducted in multiple phases. The investigation findings are documented in a RFI Report and are also used as the basis to conduct a Baseline Risk Assessment (BRA), which is comprised of a Human Health Risk Assessment (HHRA) and an Ecological Risk Assessment (ERA). Upon completion of the RFI and BRA Reports, CMR will conduct a Corrective Measures Study (CMS) to evaluate different remedial options for those areas which may warrant remediation as determined by MDEQ.

RFI Phase 1A and Phase 1B were conducted in 2023 and 2024, respectively. Collectively, RFI Phase 1 actions included the advancement of 54 soil borings, installation of 59 groundwater monitoring wells, advancement of 32 laser induced fluorescence (LIF) locations, collection of electrical resistivity imaging (ERI) data across 16 transects, and a site-wide groundwater sampling event comprised of 107 monitoring wells.

CMR evaluated RFI Phase 1 data, identified remaining data gaps, and prepared a RFI Phase 2 Work Plan to collect additional data to address the identified data gaps. The MDEQ approved RFI Phase 2 investigation will be initiated in September 2025 and is targeted for completion in February 2026.

Some of the RFI Phase 2 sampling locations are located outside the refinery fence line along the River's Edge Trail and within the Missouri River. It is important to note that these activities are investigative only and are approved by the MDEQ. CMR's presence along the River's Edge Trail and within the Missouri River are not related to any spill and/or emergency response. The RFI Phase 2 investigation actions occurring outside of the refinery fence include the installation of two groundwater monitoring wells adjacent to the River's Edge trail, collection of groundwater samples from River Edge trail monitoring wells, and collection of fourteen Missouri Riverbed porewater samples.

RFI Phase 2 strategy and approach are as follows:

- Conduct additional focused soil and groundwater sampling to assess the nature and extent of on-site soil and groundwater impacts. Six groundwater monitoring wells and five soil borings will be drilled, installed, and sampled. Additionally, four ERI calibration borings will be advanced.
- Conduct a second round of NSZD soil, soil gas, and groundwater sampling during cool weather conditions to characterize NSZD activities and rates throughout the year.
- Conduct a second round of site-wide groundwater sampling at 96 monitoring well locations.
- Conduct a third round of groundwater sampling of four Sunburst aquifer monitoring wells.
- Conduct Missouri riverbed porewater sampling to further assess a potential groundwater transport pathway from the CMR refinery to the Missouri River. Fourteen porewater samples will be collected for organic compound analysis along 1,900 feet of shoreline ~10 feet from the riverbank at depths 6 to 24 inches.

This CMR sampling is unrelated to downstream ACM Smelter and Refinery Superfund Site Operable Unit 3 inorganic contamination concerns.



Community Involvement

CMR will respond to public inquiries regarding questions pertaining to the RFI process.

Information Repository

An Information Repository has been established to store publicly available documents related to recent corrective action activities. The Information Repository can be found at www.CMRsite.com/repository.

For More Information

If you have questions or need more information, please contact the following CMR or MDEQ representatives:

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