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July 30, 2021

Ms. Denise Kirkpatrick  
Solid and Hazardous Waste Specialist  
Montana Department of Environmental Quality  
Permitting and Compliance Division  
Air and Waste Management Bureau  
P.O. Box 200901  
Helena, MT 59620-0901

**RE: Notification of Change in Use  
AOC 25 Old Poned Area**

Dear Ms. Kirkpatrick,

Calumet Montana Refining LLC's (CMR) is submitting this notification letter to inform the Montana Department of Environmental Quality (MDEQ) that due to space constraints associated with the transition of a portion of the refinery to produce renewable diesel, the AOC 25 area requires immediate redevelopment. CMR intends to construct the Pretreatment Unit (PTU) portion of the renewable diesel unit (RDU) in this area.

CMR conducted an Interim Measures (IM) Human Health Risk Assessment (HHRA) for AOC 25 which evaluated potentially exposed populations at AOC 25 to identify where response measures may be needed to address concentrations that pose a potentially unacceptable risk from reasonable maximum exposures under current and reasonably expected future land use.

Findings from the HHRA were provided in "Human Health Risk Assessment (HHRA) for AOC 25 (Old Poned Area)" dated September 2019. The HHRA concluded that the only risk posed to commercial/industrial or construction workers associated with AOC 25 are from surface soil lead concentrations.

CMR plans to eliminate the surface soil exposure pathway to these former surface soil locations with lead concentrations above the calculated arithmetic mean by filling and leveling the area prior to construction of the PTU. Filling to grade will require the placement of up to 8 feet of clean fill in this area. Clean fill from the site will be used for this purpose. The fill will be sampled and characterized to document that the material is suitable for use as clean fill.



The existing stockpile of excavated soil from AOC 25, will be characterized for appropriate disposal as will any material requiring excavation from the area as part of the redevelopment and construction of the PTU.

To further protect against exposure during construction of the PTU, and during any future maintenance activities requiring subsurface intrusion, CMR will add the area as a "restricted use" area to the facility Soil Management Plan. The restricted use designation will preclude drilling or construction activities into the known contamination without taking the proper health and safety and waste handling precautions. Waste generated during any of these activities will be properly characterized for appropriate disposal. In addition, the PTU building(s) will be designed and constructed with a vapor barrier to eliminate the vapor intrusion pathway.

Any existing groundwater monitoring wells in the vicinity of AOC 25 that need to be abandoned to accommodate construction will be properly abandoned per Montana well code requirements by a Montana licensed well driller.

With this change in use and associated actions being implemented, CMR is requesting closure from the MDEQ related to the IM HHRA associated with AOC 25 and that any further HHRA activities be conducted as part of the future facility wide RCRA Facility Investigation (RFI).

If you have any questions or concerns related to this Notification of Change in Use letter, please don't hesitate to call Joe Dauner at (406) 454-9887.

Regards,

A handwritten signature in blue ink, appearing to read "Wayne Leiker". The signature is fluid and cursive.

Wayne Leiker  
Vice President – Calumet Montana Refinery LLC

cc: Mark Cheesman, CMR