



AJM Incorporated

A Full Service Environmental Company

Water Resource Evaluation & Cleanup
Environmental Site Assessments

Fuel System Design and Compliance

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July 14, 2009

James Greenbaum, Esq.
Deputy County Attorney
Guenther Memorial Building
1709 W. College St.
Bozeman, MT 59715
406-582-3757

Re: Addendum to Phase II Environmental Assessment at
Ethanol Plant Property, Camp Creek Road, Churchill, MT

Dear Mr. Greenbaum,

Per our recent correspondence, AJM, Inc. is submitting an Addendum to the Phase II Environmental Assessment Report submitted to your office in February 2009. This Addendum is being presented to clarify soil analytical results collected (for hydrocarbon constituents), reported and compared to the Montana Department of Environmental Quality (MDEQ) Tier I Risk Based Screening Levels (RBSLs).

Diesel range hydrocarbons were found in Test Pit #7 at 5 feet below ground surface on September 12, 2008. The concentration found in the C9 to C18 Aliphatic range was 730 mg/kg. The MDEQ Tier I RBSL cleanup standard for this range of diesel concentration in the soil is 1000mg/kg for concentrations found at depths greater than two (2) feet below ground surface (bgs).

The Phase II report showed that a concentration above 200 mg/kg should be reported to and discussed with the MDEQ. Due to the uncertain future development of the property, AJM used a conservative approach in viewing the soil impacts. However, this RBSL concentration is for surface samples (0-2 feet bgs) at residential properties. Since the sample was taken at 5 feet bgs, current discussions with the MDEQ would not be necessary.

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AJM amends the report as follows:

Section I, Paragraph 6;

Diesel range hydrocarbon impacts were found ~~above~~ *below* typical clean-up levels in one soil sample.

Section 6.1 Paragraphs 2

Extractable Petroleum Hydrocarbons analysis indicates that C9-C18 Aliphatics Range concentrations (730 mg/kg) ~~exceed~~ *are below* Risk Based Screening Levels (RBSLs)

Section 9 Paragraph 5

The EPH impacts were observed at a depth of five feet below ground surface. The sample concentration of 730 mg/kg (C9-C18 Aliphatics) ~~exceeds~~ *were below* the RBSLs established by the MDEQ of ~~200~~ 1000 mg/kg for this range of hydrocarbon clean-up for soils greater than 2 feet bgs ~~most facilities~~.

Section 10, Paragraph 6

This EPH level of 730 mg/kg in test pit #7 is ~~above~~ *below* the Montanan Department of Environmental Quality recommended clean-up level of ~~200~~ 1000 mg/kg for the aliphatic (C-9 to C18) range of hydrocarbons.

Section 10 Chart

ANALYTES	SOIL	GROUNDWATER
RCRA Metals	Normal Background	Normal Background
Hydrocarbons	Above <i>Below</i> Action Levels in Test Pit #7 only	Non-Detected
Methylene Chloride	Not Tested	Detected @ concentrations near drinking water standard
Asbestos	Not found in any samples collected	Not Tested

Section 11; Paragraph 1

- ~~Since hydrocarbon levels at test pit seven (7) are more than three (3) times above the RBSLs set by the DEQ for Aliphatic concentrations in soil, discussions with the DEQ should take place to determine if any further action is necessary to remediate or evaluate this portion of the facility.~~

Replace with;

- *Should future development of the site include removal of overburden soils near the test pit 7 location that would cause impacted soils at depth to be considered surface soils, additional sampling may be warranted (dependent on whether the site is used for residential or commercial) to determine the soil hydrocarbon concentration that could be considered "direct contact" as defined by the MDEQ¹*

Table 1 Soil Hydrocarbon Analytical

See attached Table 1

If I can provide you with any further information, please feel free to call me at (406) 522-0699 or my cell at 600-2045.

Sincerely,
AJM Incorporated

by Dennis Franks, President
Attachment: Table-1 Amended

¹ Surface soil direct contact cleanup level for commercial site is 900 mg/kg, residential is 200mg/kg.