



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

Ref: 8ENF-W-NW

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Debra Will
Keller Transport, Inc.
P.O. Box 30197
Billings, Montana 59107

Re: Inspection Report for Keller Transport, Inc./Groundwater Remediation System, NPDES permit #MT0030805

Dear Ms. Will:

On June 13, 2022, representatives of the U.S. Environmental Protection Agency and Confederated Salish & Kootenai Tribes inspected the Keller Transport Groundwater Remediation System in Polson, Montana, to evaluate compliance with the facility's National Pollutant Discharge Elimination System permit for groundwater discharge. The inspection was conducted under the authority of Section 308 of the Clean Water Act (Act). Enclosed is a report of the inspection.

Based on the information reviewed and obtained during the inspection, I did not document any findings and am not requesting additional information at this time. I would like to thank Jim Rolle and Steve Wright of West Central Environmental Consultants, for their cooperation during the inspection.

Please contact me at 406-457-5022 or Prideaux.lisakay@epa.gov if you have any questions regarding this letter or the enclosed report.

Sincerely,

Prideaux, LisaKay

Digitally signed by Prideaux,
LisaKay
Date: 2022.08.01 07:52:41 -06'00'

Lisa-kay Prideaux
NPDES and Wetlands Enforcement Section
Enforcement and Compliance Assurance Division

Enclosures:

- 1) NPDES Inspection Report
- 2) Photo Log

cc:

The Honorable Tom McDonald, Chairman, CSKT (email)
Wilhelmina Keenan, Environmental Director, CSKT (email)
Evan Smith, Water Quality Regulatory Specialist, CSKT (email)

NPDES Inspection Report – Groundwater Remediation

National Database Information	
Inspection Date: June 13, 2022	Inspection Type: Groundwater Remediation
Entry/Exit Time: 16:10 / 17:20	NPDES ID Number: MT0030805
NAICS Code: 562910 Remediation Services	Inspection ID: 202206_MT0030805
Lead inspector and affiliation: Lisa-kay Prideaux, U.S. EPA Region 8, Montana Operations Office	

Facility Location Information	
Site/Facility Name & Location: Keller Transport Groundwater Remediation Facility Mile Marker 5.2 Highway 35 Polson, Montana 59860	Mail Report to: Ms. Debra Will Keller Transport, Inc P.O. Box 30197 Billings, Montana 59107

Contact Information	
	Name(s)/Title
Facility Contacts:	Debra Will, Permittee, Manager, Keller Transport, Inc. (not present)
Person/Company meeting definition of “Operator”	Jim Rolle, Director of Environmental Services, West Central Environmental Consultants (primary lead, present)
	Steve Wright, Project Manager, West Central Environmental Consultants, Inc. (present)
Authorized Official(s)	Jim Rolle, Director of Environmental Services, West Central Environmental Consultants, Inc. (present)
Tribe Representative(s)	Evan Smith, Water Quality Regulatory Specialist, Confederated Salish & Kootenai Tribes (present)
Indian Health Service Representative(s)	None present

Permit Information	
Is the permit on site and available? Yes	
Effective Date: July 1, 2018	Expiration Date: June 30, 2023
Latitude: 47.715850° N	Longitude: -114.045823° W
Receiving Water(s): Flathead Lake	
Regulatory Inspector’s source of information: Permit, Statement of Basis, EPA records, facility representatives, and facility observations.	

Areas Evaluated During Inspection		
<u>Permit</u>	<u>Self-Monitoring Program</u>	Pretreatment
<u>Records</u>	Compliance Schedule	Pollution Prevention
<u>Facility Site Review</u>	Laboratory	Stormwater
<u>Effluent/Receiving Waters</u>	Operations and Maintenance	Combined Sewer Overflow

Flow Measurement	Sludge Handling/Disposal	Sanitary Sewer Overflow
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Report Review and Signature		
Drafter Signature/Name	Address/Phone Number	Date
	U.S. EPA Region 8, Montana Operations Office 10 West 15th Street, Suite 3200 Helena, Montana 59626	
<i>Lisa-kay Prideaux</i>	406-457-5022	
Reviewer Name	Address/Phone Number	Date
<i>Kristin Ratajczak</i>	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	7/27/2022
	303-312-6310	
Management Signature/Name	Address/Phone Number	Date
Boeglin, Michael  Digitally signed by Boeglin, Michael Date: 2022.08.01 07:22:48 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NP Denver, Colorado 80202	8/1/2022
<i>Michael Boeglin</i>	303-312-6250	

Inspection Narrative and Site Description

The inspection was conducted at the Keller Transport Groundwater Remediation Facility located on the Flathead Reservation, in Polson, Montana to evaluate compliance with its National Pollutant Discharge Elimination System (NPDES) permit. The EPA issued NPDES permit #MT0030805 to the facility, effective on July 1, 2018.

On Monday, June 13, 2022, U.S. Environmental Protection Agency (EPA) inspector Lisa-kay Prideaux, and the Water Quality Regulatory Specialist for the Confederated Salish Kootenai Tribes, Evan Smith, conducted an announced inspection. The inspection commenced at approximately 16:00, when inspectors arrived at the facility, presented credentials and identification to Jim Rolle, Director of Environmental Services at West Central Environmental Consultants, Inc. (WCEC), and Steve Wright, Project Manager at West Central Environmental Consultants, Inc., and had an opening conference to explain the purpose of the inspection. The inspectors proceeded to ask a series of questions to the facility representative to help them evaluate the facility. Throughout the inspection, observations and photograph descriptions were documented. All photographs taken during the inspection are included in the attached photo log.

The Keller Transport Remediation Facility (facility) was created in response to a gasoline spill near Flathead Lake. On April 2, 2008, approximately 6,380 gallons of gasoline was spilled from a tank trailer due to a vehicle accident at mile marker 5.2 on Montana Highway 35, northeast of Polson, Montana. All the spilled gasoline had seeped into the ground before initial responders arrived on the scene. Immediate spill cleanup consisted of excavating gasoline-saturated soils adjacent to and underneath Highway 35 at the spill site. On April 6, 2008, the initial remediation contractor detected organic vapors at two spring pools near the shoreline of Flathead Lake down-gradient of the spill site. On April 7, 2008, the remediation contractor set up a temporary treatment system utilizing carbon adsorption for the two spring pools and continuous treatment and discharge of water from the springs began the next day, April 8, 2008. At the same time, 18 monitoring wells were installed to track the spill plume. A NPDES permit for the facility was issued in December 2008, authorizing discharge of the treated (remediated) ground water from the interim treatment plant to Flathead Lake.

A permanent water treatment system was completed in January 2009 to provide long-term treatment of all hydrocarbon-contaminated groundwater at the site. An interceptor trench was constructed from the treatment plant along the shore of Flathead Lake and transecting four (4) residential lots, to capture groundwater from the area predicted to have the greatest impacts, including downgradient from the excavated area, and transport water to the facility for treatment. The treatment facility consisted of ozone treatment followed by air stripping cells with horizontal diffusers. The air-stripped water was then filtered before passing through a 4,000-pound granular activated carbon (GAC) cell, followed by a 1,000-pound GAC container. The treated effluent then discharged to Flathead Lake at Outfall 001. Operation of the treatment system showed the contaminated ground water could be successfully treated using only the GAC filters and the air stripping unit was turned off after the first year of operation.

In July 2018, discharge sample results indicated the groundwater was no longer needing treatment, so an interim shutdown of the system was conducted to determine how well groundwater would resume flow toward the lake when it was no longer being collected and pumped to the treatment system. This interim shutdown revealed that the area above the interceptor trench became too saturated with water to be left unaided. Prior to the decommissioning of the treatment facility, the permittee designed and implemented a subsurface trench system to facilitate the passive flow of groundwater from the collection sumps in the

interceptor trench to the lake. Four of the subsurface trenches (outfalls 003-006) terminate at the lakeshore, and one trench (outfall 002) terminates at a small pond on one of the residential properties (lot #15), approximately 50 feet from the lakeshore.

The treatment plant, all equipment, Outfall 001, and all electrical components were removed from the site in 2019 and 2020. The only remaining surface indication of the former system is a concrete pad where the former treatment system building was located and the five monitoring wells associated with the five new outfalls. The facility no longer provides any treatment of the discharged groundwater.

The facility's effluent limits include benzene, total petroleum hydrocarbons-gasoline range organics, and pH; self-monitoring requirements include flow, toluene, ethylbenzene, total xylenes, BTEX and visual floating materials, odors, color, or any condition that produces undesirable aquatic life. A review of records showed pH upper limit exceedances for monitoring periods ending May 21, 2021, June 30, 2021, and July 31, 2021, at outfalls 003, 004, and 005. Facility representatives indicated during these timeframes the field meter calibrations were off. Once identified, the meter was manufacturer re-calibrated and exceedances ceased. Records also showed the facility did not submit its toluene sample result for outfall 006 on time for the monitoring period ending December 31, 2021. Facility representatives stated the laboratory had to re-run the sample, and therefore the sample report was late (submitted May 2, 2022).

After the facility representative interviews, the inspectors and WCEC personnel walked around the property with a copy of the Site Details Map (provided by WCEC personnel). The site walk started at the location of the old treatment facility (photo 1) and proceeded along the interceptor trench (photo 2). Inspectors also observed the old outfall 001 location (photo 3), current outfall and monitoring locations (photos 4-8), previous excavation area, and small ponds.

A closing conference has held on-site with Mr. Rolle and Mr. Wright, during which inspectors discussed the site as well as the process for the inspection report. The inspection concluded at approximately 17:20.



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Ref: 8 Montana

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jim Vaughan
Mission Valley Shrimp, LLC
61596 Mount Hwy 212
Charlo, Montana 59824

Re: Inspection Report for Mission Valley Shrimp, LLC (MTU000712)

Dear Mr. Vaughan:

On June 13, 2022, representatives of the U.S. Environmental Protection Agency and Confederated Salish & Kootenai Tribes inspected the Mission Valley Shrimp facility in Charlo, Montana, to evaluate compliance with the Clean Water Act and EPA regulations. The inspection was conducted under the authority of Section 308 of the Clean Water Act (Act). Enclosed is a report of the inspection.

Based on the information reviewed and obtained during the inspection, I did not document any findings and am not requesting additional information at this time.

Please contact me at 406-457-5022 or Prideaux.lisakay@epa.gov if you have any questions regarding this letter or the enclosed report.

Sincerely,
Prideaux,
LisaKay

Lisa-kay Prideaux
NPDES and Wetlands Enforcement Section
Enforcement and Compliance Assurance Division

 Digitally signed by Prideaux,
LisaKay
Date: 2022.08.01 08:46:49 -06'00'

Enclosures:

- 1) NPDES Inspection Report
- 2) Photo Log

cc (electronic):

The Honorable Tom McDonald, Chairman, CSKT (email)
Wilhelmina Keenan, Environmental Director, CSKT (email)
Evan Smith, Water Quality Regulatory Specialist, CSKT (email)