

**From:** Rachel Nelson <socialnelson@yahoo.com>  
**Sent:** Monday, April 11, 2022 3:36 PM  
**To:** Beggs, Tauren R - DNR  
**Subject:** Re: Information for 2626 Memorial Drive, Two Rivers  
**Attachments:** 2A11CECD-9D8E-4503-99E5-7705489DE9E3.jpeg; CED3B0C3-C4B2-4655-9522-E40EED548FAE.jpeg

On Thursday, March 31, 2022, 11:45:11 AM CDT, Beggs, Tauren R - DNR <[tauren.beggs@wisconsin.gov](mailto:tauren.beggs@wisconsin.gov)> wrote:

Hi Rachel,

(Please email me back so I can confirm you received this email)

Nice talking with you today. As we discussed on the phone, there is a closed environmental case at this property, Citgo Express, BRRTS # [03-36-174861](#). I attached the closure documentation, which can also be found along with other documentation available electronically as PDFs on the DNR's database called BRRTS on the Web. Link to BRRTS on the Web: <https://dnr.wisconsin.gov/topic/Brownfields/botw.html>, click Launch, then enter the property address 2626 Memorial Dr. There will be two cases that you can click on (see screenshot of BRRTS on the Web below). When you click on either of those cases, you will see PDF icons that can be clicked on to bring up the available documentation. The environmental case for the contamination closed in 2002 in response to a release of petroleum contamination reported to the DNR is the Citgo Express. The information available in 2018 in the Citgo Express case and Express Mart case is in regard to underground storage tanks (USTs) and piping removed, likely done around the time when the gas station closed. Sampling as part of that 2018 assessment did not show evidence of a new release from the USTs or piping. The contamination found was associated with the residual contamination from the closed environmental case in 2002.

## SEARCH RESULTS: 2 ACTIVITIES FOUND

HELP    DOWNLOAD					
Searched for: Address Contains 2626 MEMORIAL DR, Sorted by BRRTS No.					
BRRTS No. & Activity Name <i>(Click to open Activity Details)</i> Address, Municipality, County, Region	Type	Status	Juris	Start Date	End D
<b>03-36-174861 CITGO EXPRESS</b> 2626 MEMORIAL DR, TWO RIVERS MANITOWOC NE	LUST	CLOSED	DNR	1997-10-28	2002-0
<b>07-36-582671 EXPRESS MART</b> 2626 MEMORIAL DR, TWO RIVERS MANITOWOC NE	GP		DNR		

As we discussed on the phone, there are continuing obligations for properly handling any contaminated soil or groundwater if disturbed, and for maintaining the building slab and pavement cap at the property. These continuing obligations are outlined in the deed restriction for the property in the attached PDF document. If the cap is planned to be disturbed, you will need to submit a Post-Closure Modification (PCM) Request (with fees, if applicable) (Link to PCM Guidance Document: <https://dnr.wi.gov/files/PDF/pubs/rr/RR982.pdf>) to get prior approval from DNR before disturbing the cap and a new impervious cap will likely need to replace the current cap to maintain an infiltration barrier over residual contamination. As mentioned on the phone, DNR did not regulate the vapor/air pathway back when the case was closed in 2002, so DNR does recommend that if a new occupied building is proposed to be constructed in the future on this property that you evaluate for potential vapor intrusion and/or incorporate vapor mitigation into a new building. This is a link to a DNR fact sheet to provide you with more information on what vapor intrusion is: <https://dnr.wi.gov/files/PDF/pubs/rr/RR892.pdf>. An environmental consultant would need to be hired to conduct this work and provide documentation to the DNR on your behalf (Link to list of environmental consultants in Wisconsin: <https://dnr.wi.gov/DocLink/RR/RR024.pdf>).

As you mentioned on the phone, if you only want to demo the building and do not plan to disturb the building slab or foundation, then this does not require a post-closure modification request from my program because the impervious cap (building slab) would not be disturbed.

If you have any other questions, please feel free to contact me.

Regards,

**We are committed to service excellence.**

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**Tauren R. Beggs**

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