



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott Walker, Governor
Cathy Stepp, Secretary

South Central Region Headquarters
3911 Fish Hatchery Road
Fitchburg, Wisconsin 53711-5397
Telephone 608-275-3266
FAX 608-275-3338
TTY Access via relay - 711

December 16, 2016

Estate of Richard P. Johnson
C/O Suzanne Johnson
5128 N. Waverly Dr.
Milton, WI 53563

Subject: Case Closure Denial for Incomplete Investigation
North Main Citgo, 25 North Main Street, Edgerton, Wisconsin 53534
DNR BRRTS Activity Number: 03-54-176662

Dear Ms. Johnson:

On October 6, 2016, the South Central Regional Closure Committee reviewed your request for closure of the case described above. The Department of Natural Resources reviews environmental remediation cases for compliance with state and federal laws to maintain consistency in the closure of these cases. As discussed with you on December 7, 2016, the closure committee has denied closure because additional requirements must be met. The purpose of this letter is to inform you of the remaining requirements for obtaining closure. We request that within 60 days of this letter, you provide us with your written response regarding the necessary work and a schedule for completion of this work.

As noted above, additional site work is necessary in order to meet the requirements for site closure because

Need to Define the Degree and Extent of Contamination

Additional soil and groundwater investigation is needed in order to define the degree and extent of contamination.

Soil sampling is required in the area of:

1. The former dispensers to evaluate the risk from direct contact. Samples should be collected within 0 to 4 feet below ground surface and field analyzed with a photo-ionization detector (PID – an instrument used for screening soil for the presence of contamination) and laboratory analyzed for petroleum volatile organic compounds (PVOCs) and polycyclic aromatic hydrocarbons (PAHs). A minimum of 3 samples from locations surrounding each dispenser should be collected and analyzed. Sampling should extend out until the risk is defined.
2. Soil boring MW-2 to define the extent of contamination exceeding the direct contact residual contaminant levels for PVOCs and PAHs. A minimum of 3 samples from locations surrounding the MW-2 sample location should be collected and analyzed. Sampling should extend out until the risk is defined. Samples should be collected within 0 to 4 feet below ground surface and field analyzed with a PID and laboratory analyzed for PVOCs and PAHs.

Groundwater must be investigated on the adjacent property to the southwest in the area of soil boring G2. A monitoring well constructed in compliance with ch. NR 141, Wis. Adm. Code, is required to be installed and sampled. Continuous field sampling of the soil with a PID should be completed during the advancement of the boring.

Need to Conduct Additional Groundwater Monitoring

Additional groundwater monitoring is needed in order to establish compliance with the closure criteria of ch. NR 726, Wis. Adm. Code. If monitored natural attenuation is to be used as a remedial action, you need to determine whether there is a stable or receding plume. A minimum of two rounds of groundwater samples are required from the new monitoring well and the remainder of the existing monitoring well network. The new well samples should be laboratory analyzed for VOCs and naphthalene during the first sampling event, followed by PVOCs plus naphthalene during subsequent events. If impacts other than PVOCs plus naphthalene are detected in the initial sample, those parameters should be included in subsequent analyses. The remainder of the existing monitoring well network samples should be analyzed for PVOCs plus naphthalene. Water table elevation measurements and groundwater flow maps are required for each round. Additional sampling rounds of all wells, including the new monitoring well, should be completed until a stable or receding plume is established.

In addition to the work required above, be sure to submit all results from the tank system site assessment completed when the tank system was removed in December 2015. This data should be included with the subsequent reports.

A complete closure request should be re-submitted once all the above requirements have been satisfied, together with any required documentation, to let the Department know that applicable requirements have been met. Case closure can be considered once all the above requirements have been satisfied.

Within 60 days of the date of this letter, please respond in writing with a schedule of your plans to meet these requirements. Until requirements have been met, your site will remain "open" and you will also need to continue to submit the semi-annual progress reports, as required by s. NR 700.11, Wis. Adm. Code. You will also be responsible for any operation and maintenance activities required under s. NR 724.13, Wis. Adm. Code.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at (608) 275-3310.

Sincerely,



Linda Hanefeld
Team Supervisor, South Central Region
Remediation & Redevelopment Program

cc: Ron Anderson, METCO, 709 Gillette St., Ste 3, La Crosse, WI 54603