

February 11, 2019

Suzanne Johnson
c/o Ed Francois
128 W. Main Street
Belleville WI 53508

Subject: Case Closure under Wis. Admin. Code ch. NR 726 Not Recommended
North Main Citgo, 25 N. Main St., Edgerton Wisconsin
DNR BRRTS Activity # 03-54-176662

Dear Ms. Johnson:

On February 7, 2019, the Wisconsin Department of Natural Resources (DNR) reviewed the closure request for the case identified above. As you are aware, the DNR reviews environmental remediation cases for compliance with applicable laws, including Wis. Stat. ch. 292 and Wis. Admin. Code chs. NR 700 – 754 and whether any further threat to public health, safety or welfare or the environment exists at the site or facility, per Wis. Admin. Code § NR 726.13 (2) (b).

As indicated to METCO, the project's environmental consultant, by email on February 8, 2019, case closure is not recommended because additional legal 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 the information requested or your written response regarding the necessary work and a schedule for completion of this work.

Additional Requirements Needed for Case Closure Under Wis. Admin. Code ch. NR 726

As noted above, additional work is necessary to meet the requirements for case closure. The information collected since your 2016 closure submittal shows significant additional contamination that needs to be addressed.

Need to Define the Degree and Extent of Contamination

Additional sampling and data evaluation is needed to define the degree and extent of contamination per Wis. Admin. Code § NR 716.11. The newest monitoring well MW-8 has the highest level of MTBE in groundwater at the site and also high levels of benzene. Since MTBE is often at the leading edge of petroleum plumes in groundwater, a better understanding of groundwater and contaminant flow is needed. In the submittal required below, indicate how you will determine the extent of contamination in this area.

In addition, please have your consultant present a revised explanation of the geologic and hydrogeologic setting, the horizontal and vertical extent of soil and groundwater exceeding NR 720 and NR 140 standards, and known (or potential) source areas based on the contamination found. Include revised maps and cross-sections, some of which should include the most contaminated areas and the areas to be capped.

Need to Complete a Vapor Investigation

The 2015 tank system site assessment indicates that contaminated soil is found close to the building foundation. Additional site investigation, per Wis. Admin. Code § NR 716.11 (5), is needed to determine whether vapor

intrusion is a completed pathway at this site, or if there is a risk of future vapor exposure due to residual contamination. If vapor intrusion is an issue at this site, document all source control actions taken under Wis. Admin. Code § NR 726.05 (8).

Need to Evaluate Remedial Action Options

Possible remedial action options need to be evaluated according to Wis. Admin. Code ch. NR 722 after the degree & extent of contamination are defined.

Need to Clarify Continuing Obligations

When next submitted for a closure review, consider whether the proposed cap would be to cover soil exceeding direct contact standards, groundwater pathway standards, or both. The site building has some contamination close to its foundation and may need to be designated a structural impediment to further work.

Schedule

Within 60 days of the date of this letter, respond in writing with a schedule of your plans to meet these requirements. Please submit a workplan, PECFA cost request, and proposed schedule.

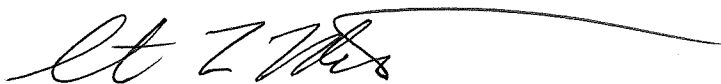
Until requirements are met, your site will remain “open,” and you are required to submit semi-annual progress reports, per Wis. Admin. Code § NR 700.11. You are also responsible for any operation and maintenance activities required under Wis. Admin. Code § NR 724.13. Once the additional work has been completed, documentation should be submitted to the DNR to demonstrate that the applicable requirements have been met, per the timelines above.

Conclusion

If you have any questions regarding the information in this letter or would like to schedule a meeting to discuss this case, please contact the DNR project manager, Cindy Koepke at 608-275-3257 or cynthia.koepke@wisconsin.gov. For more information on the closure reconsideration process, please see DNR publication, RR-102, “Wis. Admin. Code ch. NR 726 Case Closure Reconsideration Process” by visiting dnr.wi.gov, search: RR-102, for more information.

The DNR appreciates your efforts to restore the environment at this site.

Sincerely,



Steven L. Martin, P.G.
Team Supervisor, South Central Region
Remediation & Redevelopment Program
Telephone: 608-275-3310
Email: stevenl.martin@wisconsin.gov

Attachment: February 8, 2019 email

cc: Jason Powell - METCO
Robert Cusick, 15 N. Main Street, Edgerton WI 53534

Koepke, Cynthia L - DNR

From: Koepke, Cynthia L - DNR
Sent: Friday, February 8, 2019 3:02 PM
To: 'Jason Powell'; 'Ron Anderson'
Cc: Martin, Steven L - DNR
Subject: North Main Citgo 03-54-176662

Hi Jason and Ron,

I brought your closure request for North Main Citgo in Edgerton to the regional closure committee yesterday. The committee's decision was closure not recommended. I will be preparing a letter for my supervisor's signature with specific comments from our review. After you get the letter, if you and/or the RP would like to meet with us to discuss it, please let me know and I can set up a meeting.

Thank you.
Cindy Koepke

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Cindy Koepke, P.G.

Hydrogeologist, Remediation & Redevelopment Program

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