



July 9, 2020

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 and Mr. Francois:

On July 2, 2020, the Wisconsin Department of Natural Resources (DNR) reviewed the closure request for the case identified above. The DNR regional closure committees review 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 July 7, 2020, 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.

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

NR 726.05(6)(a) requires evidence that adequate source control measures were taken. NR 722 requires remedial action options be evaluated. We are asking that you provide the technical justification for not implementing an active remedial measure at the site.

NR 726.05 (6)(a) also requires evidence that contaminant mass and concentrations have been reduced sufficiently by natural processes to protect human health and the environment. The estimated mass of contamination remaining should be determined from site investigation data per § NR 716.11(2r)(d), compared to earlier data, and used to determine if this criterion has been met.

As new sample data becomes available, it is essential to update the explanation of site conditions (and the associated figures). Attachment C, section C-1 of the closure request indicated more complex layering of fine and coarse soils than previously presented; this is not represented on the cross-sections submitted. Does this additional soil information and the results of the LIF survey shed any light on the questions raised in the Department's February 11, 2019 and February 20, 2020 letters (copies attached)? In your next submittal, incorporate this additional information, the answers to the questions in the Department letters, and updated cross-sections.

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 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 608-622-6741, 608-275-3257 (voice mail only while teleworking), 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.

Sincerely,

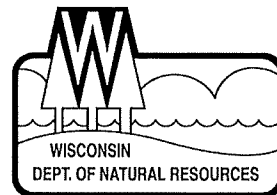
A handwritten signature in blue ink, appearing to read "C. Koepke", is positioned above the word "for".

for

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

Attachments: February 11, 2019 letter
February 20, 2020 letter

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



February 10, 2020

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

SUBJECT: Need for additional evaluation
North Main Citgo, 25 N. Main St., Edgerton
BRRTS # 03-54-176662

Dear Mr. Francois:

I recently discussed the status of this case with DNR's South Central Region closure committee. Below are the items that need additional work.

Free-phase petroleum

During the 2019 well sampling, METCO found free-phase petroleum product (the shorthand phrase for this is "free product") in well MW-9. Please have your consultant submit a PECFA budget request with a plan to delineate the extent of free product and a proposal for active removal of free product.

Additional discussion in next letter report

The committee pointed out that requirements for case closure from DNR's February 2019 letter have not yet been addressed by METCO and need to be completed:

1. An explanation of how groundwater flow direction appears to vary seasonally and what impact that could have on the North Main Citgo contamination, why the flow direction is different from what surface topography would suggest, and is flow direction geologically controlled?
2. If data from the closed Halverson's 66 case are used to define the western edge of the plume, include a concise summary of the relevant Halverson's data you are using
3. Discuss the horizontal and vertical extent of soil and groundwater contamination exceeding state standards and how that relates to known or potential source areas
4. MW-8 has the highest level of MTBE in groundwater at the site. MTBE is often at the leading edge of petroleum plumes in groundwater, and MW-8 is believed to be upgradient of the source areas. Explain how contaminant movement could account for the high levels of MTBE (and benzene) in this well.

If you have any questions regarding the information in this letter or would like to schedule a meeting to discuss this case, please contact me at 608-275-3257 or cynthia.koepke@wisconsin.gov. We look forward to working with you to keep moving this case toward closure.

Sincerely,

Cynthia L. Koepke, P.G.
Remediation & Redevelopment Hydrogeologist
South Central Region

Copies to:

Ron Anderson/Jason Powell – METCO (by email)
Robert Cusick, 15 N. Main Street, Edgerton 53534
Suzanne Johnson, 5128 N. Waverly Dr., Milton 53563



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.

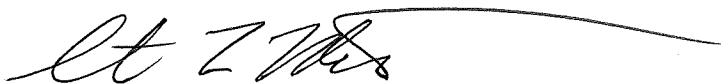
Until requirements are met, your site will remain “open,” and you are required to submit semi-annual progress reports, per Wis. Admin. Code § NR 700.11. You are also responsible for any operation and maintenance activities required under Wis. Admin. Code § NR 724.13. Once the additional work has been 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