



March 14, 2017

Bachand Estates, LLP  
Adam Bachand  
1406 Belknap Street  
Superior, WI 54880

Subject: Case Closure Denial for incomplete site investigation  
Smith's Union 76 Station (Former)  
11427 S Business Highway 53, Solon Springs, Wisconsin  
DNR BRRTS Activity # 03-16-000069

Dear Mr. Bachand:

On February 2, 2017, the Northern Region 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 February 2, 2017, 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 a complete site investigation and case closure. The downgradient degree and extent of groundwater contamination has not been defined. Additional investigation is necessary to define the vertical and horizontal extent of the groundwater impacts. Maps showing the property boundaries of impacted properties should be included in future submittals.

**Need to Conduct Additional Groundwater Monitoring**

Additional groundwater monitoring is needed in order to establish compliance with the closure criteria of ch. NR 726. If monitored natural attenuation is to be used as a remedial action, you need to determine whether there is a stable or receding plume.

**Need to Define the Degree and Extent of Contamination**

Additional groundwater sampling is needed in order to define the degree and extent of contamination. This will necessitate additional groundwater sampling rounds and may entail additional groundwater monitoring wells and/or piezometers, if needed. Additional sampling points should be installed to define the vertical and horizontal extent downgradient of groundwater contamination and groundwater flow directions. Evaluate and address potential risk to the receptors of the drinking water wells on adjacent properties and the lake.

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 DNR Project Manager Ralph Smith at (608) 261-6543 or me at (715) 359-8932.

Sincerely,



John Robinson  
Team Supervisor, Northern Region  
Remediation & Redevelopment Program

cc: Ron Anderson – METCO, 709 Gillette Street, Suite 3, La Crosse, WI 54603  
Ralph Smith – DNR Project Manager Madison RR/5