



September 10, 2021

Robert Richardson  
507 Campus Street, Apt. 7  
Milton WI 53563

SUBJECT: Former Bob's Citgo, 602 W. Madison Avenue, Milton, Rock County  
BRRTS # 03-54-000193

Dear Mr. Richardson:

I know you are concerned that the Bob's Citgo petroleum clean-up project was not completed before the end of PECFA and that you are working with a new consultant to get the project completed and closed. During a recent review of the former Bob's Citgo case file, DNR staff found some gaps in the data and some unanswered questions about the contamination. The group also recommended some work (discussed below) to meet the requirements of the NR 700 series of the Wisconsin Administrative Code and move the project forward.

#### **Soil characterization**

Many of the soil borings for this project were "blind drilled" (drilled without soil cores that would most accurately show the depths and thicknesses of different soil layers). Detailed information on the soil layers is needed to figure out if the petroleum contamination is in some or all the layers and if it is staying at the same level or sinking as it spreads out from the source areas.

Your consultant can review the existing information from your project and nearby projects to see if there's enough accurate information to prepare a geologic cross-section (a "slice" through the site that shows the details of soil, groundwater, and contamination underground), as required by NR 716.15(4)(d).

The site utilities need to be mapped along with the extent of remaining soil contamination. Contamination sometimes takes a shortcut through the disturbed soil of a utility trench or the sandy soil often placed around buried pipes. The contamination map in the Seymour Environmental Soil Excavation Report shows contamination found during the excavation but does not show soil contamination found in earlier work.

Getting the tanks and contaminated soil out in fall of 2019 is a big positive for this project and will go a long way to improving conditions at the site. The soil samples 1 and 2 (taken from the excavation sidewalls) show high levels of soil contamination at the property boundary between the Bob's Citgo property and the neighboring property (Jim's Tire). Some additional soil samples are needed to figure out how far the contamination goes on to the neighboring property; NR 716.11(4) requires that the field investigation be extended "beyond the property boundaries as necessary to fully define the extend of the contamination."

#### **Groundwater characterization**

The water table maps for this project consistently show a high spot near MW-2, in the tank bed area north of the building, and also that groundwater seems to flow from there both to the west and the southeast. It is likely that these maps don't really show how groundwater is flowing out there. If there was any groundwater flow to the

southeast, we would expect there to be contamination in MW-10 by now; however, no contamination has been found there in the 4 samples taken between 2013 and 2017.

There are a few possible explanations for that high spot near MW-2:

1. MW-2 might be screened in a more permeable soil layer than some of the other wells
2. a leak from a buried water line or other utility line
3. some other kind of focused water recharge, like a drain or maybe eave troughs off a roof

Hydraulic conductivity testing of monitoring wells is needed to help determine if some wells are monitoring more permeable soils, aid in our understanding of contamination moving from the site, and meet the requirements of NR 716.15(3) (i).

It may take some time for groundwater quality to stabilize after the big excavation in 2019. Some additional groundwater sampling will be needed, and we will leave it to you and your consultant to propose the number of samples and the timing of them. Please keep in mind that when you submit a closure request, recent data from the entire groundwater monitoring network will be needed.

Thank you for your effort in investigating and cleaning up the environment. I am confident we can work together to keep this project moving toward closure. If you have any questions, you may contact me at 608-219-2181 or [cynthia.koepke@wisconsin.gov](mailto:cynthia.koepke@wisconsin.gov).

Sincerely,



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

Copy by email: B. Socha, SCS Engineers  
Issac Ross – DNR