



July 5, 2017

Tom and Renee Mortenson
W4109 STH 73
Neillsville, WI 54021

Subject: Shortville Store Site Investigation, DNR BRRTS#: 03-10-000581

Dear Mr. and Mrs. Mortenson:

Thank you for contacting me with your concerns related to the investigation of petroleum contamination at the former Shortville Store site. Additionally, thank you for your patience while awaiting my response. I waited to respond to your letter in order to give Governor Walker, Senator Moulton, and Representative Kulp adequate time to contact the remediation and redevelopment program with any concerns they had regarding the department's request that you complete a site investigation at the Shortville Store site. The department has not been contacted by Governor Walker, Senator Moulton, or Representative Kulp concerning your letter and wanted to reiterate the need to complete the site investigation at this site.

Your April 03, 2017 letter raised two questions regarding my request for additional monitoring at your property.

1. *"If Ron Anderson, METCO, is correct and there is only a tiny chance of anyone even getting mildly ill from contamination caused by Drescher Oil, why the ongoing monitoring cost?"*

The department is requesting additional monitoring to define the extent of contamination caused by activities related to the Shortville Store. Soil and groundwater contamination exists below the former fuel island as shown by METCO's 2016/17 soil and groundwater sampling results. In order for the department to close a site with groundwater contamination present, a negative groundwater concentration trend must be established. Additional groundwater monitoring will tell us if the groundwater contamination is cleaning itself up via natural attenuation. This is a requirement of all sites our program oversees regardless of potential receptors and is a requirement in Wisconsin Administrative Code Chapter NR 726.05(6).

I requested that METCO take additional soil and groundwater samples to the southwest of the former fuel island (approximately 30 feet from the intersection of STH 73 and Miller Ave.) in order to further define the extent of soil contamination at the site as required by Wisconsin Administrative Code Chapter NR716.11. No samples have been taken this area and therefore the degree and extent of contamination is unknown in this area. For a consultant or the department to accurately assess contaminant receptors the degree and extent should be defined. Before a request for closure is made these additional samples should be taken.

A spill did occur at this site and was caused by Drescher oil in or about 1984. This approximate date was established by interviews with Robert Mortenson Jr. on August 21, 1991 and Carol Mortenson on August 26, 1991. Art Drescher was named as a responsible party for the Shortville Store site and performed an inadequate response to the release he caused. Art Drescher did business as Art Drescher- a sole proprietor, his death in 2001 dissolved him of liability for the 1984 release. There is no evidence that a release has occurred while Marla and

Joel Raine have owned Drescher Oil, therefore the Department of Natural Resources cannot hold Marla or Joel Raine responsible for the contamination at this site.

2. *"If such a minute amount of contamination warrants such an extensive degree of monitoring, why isn't contaminated soil being removed and replaced?"*

This is a great question to raise, we often request excavations at sites with petroleum contamination as a remedial action. Performing a remedial action, in this case an excavation, prior to defining the degree and extent of contamination can lead to a poorly targeted excavation- essentially putting the cart before the horse. The dig may miss heavily contaminated areas because the site has not been adequately investigated. After defining the degree and extent a remedial action can be chosen. This approach is also a part of Wisconsin Administrative Code Chapter NR 722.05(4)(a):

"To select a remedy or combination of remedies, responsible parties shall identify, evaluate and document an appropriate range of remedial action options to address each contaminated medium in accordance with the requirements of this chapter, when one of the following happens:

- (a) A site investigation report is completed in accordance with ch. NR 716
- (b) An evaluation of remedial action options is required in accordance with ch. NR 508"

I discussed the results of METCO's 2016/17 sampling with our regional closure committee to see if enough information is available for them to close this site- they agreed that additional investigation is warranted. If you can agree to METCO installing additional soil borings at this site I am happy to work with you on locating the borings in areas agreeable to you.

Please contact me by email at MatthewA.Thompson@wisconsin.gov or by phone 715-839-3750 if you have further questions about the work I have requested to be performed at this site.

Sincerely,



Matt Thompson
Hydrogeologist
Remediation and Redevelopment Program