

February 22, 2016

Bonnie Smith  
3740 N. Martin Street  
Radisson, WI 54867-7001

Subject: Case Closure Denial for degree and extent not defined downgradient  
Adams Garage, 10634 W. Omaha Street, Radisson, Wisconsin  
DNR BRRTS Activity # 03-58-000706

Dear Ms. Smith:

On November 2, 2015, the DNR Northern Region Case 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 your consultant Meridian Environmental Consulting, LLC on November 2, 2015, 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.

Additional site work is necessary in order to meet the requirements for site closure because the downgradient degree and extent of the petroleum contaminant in groundwater is not defined. Groundwater monitoring wells MW-13A and MW-13B are above enforcement standards (ES) for benzene. Additional downgradient monitoring wells are needed to define the extent of the impacts to groundwater.

**Need to Complete a Vapor Investigation**

Additional site investigation is needed to determine whether or not vapor intrusion is a completed pathway at this site, or if there is a risk of future exposure due to residual contamination. If vapor intrusion is an issue at this site, document all source control actions taken.

**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. The depth to groundwater beneath the motel and the separation distance horizontally and vertically in relation to the plume and motel foundation and utility corridors is required.

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

Additional groundwater and/or vapor sampling is needed in order to define the degree and extent of contamination. If there is less than five feet of clean soil/fill between the contaminated groundwater table, if applicable, and the slab on-grade foundation of the motel, then further vapor intrusion

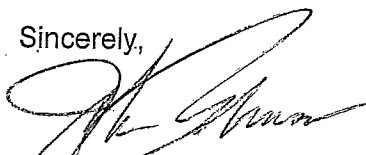
assessment measures may be warranted. In addition, property boundaries for all impacted properties shall be defined on the site maps.

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 Ralph Smith at (715) 261-6543.

Sincerely,



John Robinson  
Northern Region Team Supervisor  
Remediation & Redevelopment Program

cc: Ken Shimko, Meridian Environmental Consulting, LLC  
Ralph Smith, DNR Project Manager RR/5