



August 19, 2019

Mr. Tom Walker
1500 Walker Road
Gratiot, Wisconsin 53541

On Subject: Case Closure under Wis. Admin. Code ch. NR 726 Not Recommended
Walkers One Stop, 10410 State Road 11, Gratiot, Wisconsin
DNR BRRTS Activity # 03-33-001415
Parcel Identification No.: 131.0036.0000

Dear Mr. Walker:

On August 15, 2019, the Wisconsin Department of Natural Resources (DNR) reviewed the closure request for the case identified above. 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 discussed with your consultant on August 19, 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

Additional work is necessary to meet the requirements for case closure because the DNR is concerned about the adequacy of the site information. Based on the information presented in the Closure Request, it appears that the extent of soil and groundwater contamination, both horizontally and vertically has not been defined.

Groundwater Flow Direction

The ground water flow direction depicted in the water table map presented in the Closure Request indicates a generally southerly to southeasterly flow direction; essentially showing groundwater flowing uphill topographically and away from the nearby stream located a block away to the west. The topography and drainage in this locality would strongly suggest that groundwater flow should be westerly to northwesterly, with discharge to the nearby stream. This contradictory flow pattern could be due to a number of possible factors. The most obvious of these include:

- The reference elevations (top of well casing elevations) used to calculate the water elevations are incorrect; or
- Groundwater is being drawn to the south/southeast by a high capacity extraction well.

The nature and extent of groundwater contamination cannot be defined if the flow direction is not defined. Therefore, the Department recommends the following actions to resolve this issue:

- Resurvey the wells to determine if there is an error in one or more reference elevations. If an error is discovered, recalculate water level elevations and prepare a revised flow map.
- Do a comprehensive search for ground water extraction wells in the area. If extraction wells are present, map their locations and contact the owners to determine average daily pumping rates. From that information, perform calculations to assess if these wells could be influencing groundwater flow at the site. Collect and analyze groundwater samples from any wells potentially in or near the path of the plume.

The information gained from this work should be evaluated to determine the need for the placement of a piezometer or multiple piezometers.

Additional Groundwater Monitoring

Additional groundwater monitoring is needed to establish compliance with the closure criteria of Wis. Admin. Code § NR 726.05 (6). Two rounds of groundwater sampling need to be conducted to better define current conditions and threat potential of existing contamination.

The use of hydrographs for specific monitoring well information could allow for better understanding of groundwater data.

Soil Contamination Extent

The results of the soil sampling of borings G-4 and G-5 present substantial levels of contamination in the saturated area of soil. The extent of soil contamination to the west of the source area appears to need additional definition and explanation. Additional borings/monitoring well(s) in that area are recommended.

The production of a bedrock surface map could enhance the site information and possibly support the technical explanation for the distribution of deeper soil contamination.

Schedule

Within 60 days of the date of this letter, respond in writing with a schedule of your plans to meet these requirements. The supplemental site investigation work plan should be submitted within 60 days (NR 716.09 Wis. Admin. Code.). Additional site investigation work should commence within 90 days of approval of workplan (NR 716. 11 (2g) Wis. Admin. Code). The supplemental site investigation report must be submitted within 60 days of completion of work (NR 716.15 (1) Wis. Admin. Code).

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. 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.

Case closure can be reconsidered by the DNR once the additional documentation has been received.

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, Wendell Wojner at (608) 275-3297 or wendell.wojner@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,

A handwritten signature in black ink, appearing to read 'SLM', with a long horizontal flourish extending to the right.

Steven L. Martin
Team Supervisor, South Central Region
Remediation & Redevelopment Program

cc: Jason Powell, METCO, 709 Gillette Street, Suite 3, La Crosse, Wisconsin 54603