



September 25, 2020

Mr. Scott Buckner  
Citgo Petroleum Corporation  
2316 Terminal Drive  
Arlington Heights, IL 60065

Subject: Incomplete Site Investigation Citgo Terminal, 9235 North 107<sup>th</sup> Street,  
Milwaukee, Wisconsin  
BRRTS #: 03-41-001622, 02-41-000700, FID #:241309090.

Dear Mr. Buckner:

The Wisconsin Department of Natural Resources (DNR) completed the review of the closure re-submittal and the cover letter to the closure on September 10, 2020 submitted on your behalf by your consultant, Groundwater & Environmental Services, Inc. (GES). The cover letter addresses responses to the DNR Closure denial letter (Closure not recommended) dated September 8, 2000. As stated in the meeting with you and your consultant on February 21, 2020 the DNR currently does not grant closure to sites that do not have an approved Site Investigation (SI).

Several items raised by the DNR in September 8, 2020 remain to be addressed. These are as follows:

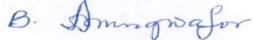
- Provide a map showing the location of the concrete outfall and sample location at the Koch/Jacobus Quick Flash property that was sampled and it contained a concentration of methyl tert-butyl ether (MTBE) of 25,200 parts per billion (ppb).
- The DNR discontinued the use of Mann-Kendall Statistics to demonstrate decreasing trends on given sites. Please provide linear regression graphs demonstrating contaminant trends over time on this site.
- Provide a groundwater contour map that shows the delineation of the lateral extent of groundwater impact on the U.S. Oil property approximately 245 feet south of the Citgo Milwaukee Terminal.
- On August 17, 2020, the DNR sent you a letter titled, *Reminder to Include Evaluation of Emerging Contaminants in Site Investigation*, which stated that it is your responsibility to evaluate hazardous substance discharges and environmental pollution including emerging contaminants under the Wis. Admin. Code NR 700 rule series. Per Wis. Admin. Code §§ NR 716.07, NR 716.09, provide an evaluation of potential perfluoroalkyl and polyfluoroalkyl substances (PFAS) and other applicable emerging contaminants that were historically or are presently produced, used, handled, or stored at the site. This should include any available information on whether any products containing PFAS were used in any process services, the duration of PFAS-containing product use, the type of PFAS contained in the product, and any areas of the site where PFAS-containing products may have been used, stored, managed, or discarded.
- Provide a statement claiming that new information together with previous documented reports comprise a complete site investigation report.

**Case Closure Form 4400-202 (R/16)**

- Submit an additional closure form for BRRTs Case 02-41-000700 and GIS database fees of \$350 for groundwater and \$300 for soil.
- Submit database fees for BRRTs Case 03-41-001622, \$350 for groundwater and \$300.00 for soil. (the closure fee of \$ 1050 has been previously submitted)

Upon receipt of the above information, the DNR will review the SI for completeness, and if determined to be complete, will proceed with the review of the site closure request. If you have any questions concerning this letter, please contact me at 414.208.5874 or at my e-mail at [Binyoti.Amungwafor@wisconsin.gov](mailto:Binyoti.Amungwafor@wisconsin.gov)

Sincerely,



Binyoti F. Amungwafor  
Hydrogeologist  
Southeast Region, Milwaukee Service Center

CC: Amber Verbick, GES  
SER Case File #: 241309090.