

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Gloria L. McCutcheon, Regional Director

Plymouth Service Center
1155 Pilgrim Rd
PO Box 408
Plymouth, Wisconsin 53073-0408
Telephone 920-892-8756
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June 5, 2003

Mr. Eric Larson
Clark Retail Enterprises, Inc.
3003 Butterfield Road
Oak Brook, IL 60523

Subject: Closure request for the Clark Station No. 1656, 1020 Washington Street,
Grafton, WI 53024 **WDNR FID#246065160 BRTS#0346003224**

Dear Mr. Larson:

The Wisconsin Department of Natural Resources (the Department) has received a request for closure of the above-referenced site submitted on your behalf by ATC Associates, Inc. The Department reviews environmental remediation cases for compliance with state statutes and rules to maintain consistency in the closure of these cases. Based on a review of your closure request, it has been determined that the following additional site work is necessary in order to meet the requirements for site closure:

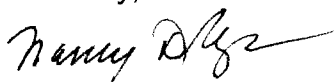
1. Because field screening for volatile organic compounds at several soil boring locations indicated high concentrations and odors in the intervals just above the bedrock surface, the Department is requesting that a piezometer be installed into bedrock on the east side of the site (in the vicinity of MW-1) to evaluate groundwater conditions at the top of bedrock.
2. Please conduct 4 consecutive quarters of groundwater monitoring at the newly installed bedrock piezometer and well MW 1 to evaluate seasonal trends and establish justification for natural attenuation closure. Measure groundwater elevation at all wells during each monitoring event and sample wells 4 and 5 if the measured water elevation falls within the screened interval. Groundwater should be analyzed for petroleum volatile organic compounds and naphthalene.
3. Please provide disposal documentation for the 50 yd³ of contaminated soil excavated during piping upgrades in 1993.
4. Verify the location of monitoring well MW-1. It is shown to be north of S1 in early site plans, and later shown adjacent to B1.
5. Proposed deed restriction will need to include specific asphalt repair and maintenance requirements.

Once the additional work outlined above has been completed, a brief submittal should be sent to the Department. The information will be added to the file for review and your request for closure will be reconsidered.

If there is additional relevant information that was not previously provided to the Department that you believe might change the Department's closure decision, you may submit that information for our re-evaluation of your closure request.

If you have any questions regarding this letter, please contact me at (920) 892-8756 ext. 3025.

Sincerely,



Nancy D. Ryan, Hydrogeologist
Bureau for Remediation & Redevelopment

cc: SER site file
Jennifer Michaelson, ATC Associates, Inc.
