



George E. Meyer
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

North Central District Headquarters
Box 818
Rhinelander, Wisconsin 54501
TELEPHONE 715-369-8900
TELEFAX 715-369-8932

February 1, 1995

IN REPLY REFER TO: ERRP

P C Christiansen, President
C M Christiansen Company
P.O. Box 100
Phelps, Wisconsin 54554

SUBJECT: C M Christiansen Environmental Repair Site

Dear Mr. Christiansen:

I would like to follow up on the issues we discussed at site on January 18, 1995. We greatly appreciate you taking the time to meet with our Superfund program representatives and Mr. Neid of the U.S. Environmental Protection Agency. I believe it was a very informative meeting for all parties involved and it has helped us focus on an effective plan for investigation and clean-up of your property.

We discussed four basic alternatives in which the site clean-up work could proceed.

Alternative

1. You would proceed with an investigation and remediation with Montgomery Watson as your environmental consultant.
2. The Department would proceed with the investigation and clean-up of the site as a State Lead Project. The Department would use the Environmental Fund to fund the project and initiate an enforcement action to seek cost recovery from C M Christiansen Co.
3. The Environmental Protection Agency would proceed with the investigation and clean-up of the site as a Emergency Removal Project. The Environmental Protection Agency would initiate an enforcement action for cost recovery of all funds expended for site clean-up..
4. You would proceed with an investigation of the site with a less expensive environmental consulting firm. Once the degree and extent of contamination was defined, you would bring in a more technically qualified consultant to handle the clean-up.

As I mentioned on site, the Department believes that this site must proceed with investigation this spring. We believe that the contaminants in the soil and groundwater are continuing to migrate and making the situation worse over time. Any delays will not only cause additional environmental damage, but it is likely that it will significantly increase the cost of the investigation and clean-up.

We also discussed the issue of bringing on site up to 20,000 cubic yards of soil from a nearby road construction project. I believe that we can work with you on the placement of soil, but I must emphasize that the responsibility for the final decision is yours. After looking at the site and the existing technical information, I believe that it may be possible to place the soils on the northwest part of the property, possibly bringing them on site from north of the existing access road. (see attached figure). This area is up gradient of groundwater flow and should therefore not interfere with a groundwater investigation or remediation. To verify that underlying soil in this location has not been contaminated, you will be required to collect a series of soil samples from the location you plan to place the imported material. I would be happy to work with you on the placement, depth and analytical requirements for these samples. You may want to request that the imported soils are analyzed to be certain that contaminated soils are not being placed on your property. The most important thing for you to consider is to make certain that placement of these soils will in no way interfere with the environmental clean-up of the site.

You will need to inform us of your final decision to proceed or not to proceed with the environmental investigation by February 14, 1995. A scope of work should be developed by your consultant for the environmental investigation by April 15, 1995. If either of the above time lines are not complied with the Department will be compelled to ask the Environmental Protection Agency to perform the investigation and Emergency Removal.

I look forward to hearing from you by February 14, if you have any questions you can reach me at (751) 365-8961.

Sincerely,



M. Scott Watson
Environmental Repair Coordinator

CC: Connie Antonuk, NCD
Michelle Owens, NCD
Raymond M. Roder, 7617 Mineral Point Road
P.O. Box 2020
Madison, WI 53701-2020

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