



April 15, 2019

SCOTT MILLER
TGAS REAL ESTATE HOLDINGS LLC
5260 WESTVIEW DRIVE, SUITE 200
FREDRICK MD 21703

RE: Technical Assistance Request
Como Oil & Propane – Fagerlin/Heehn
1124 North 6th Street, Superior, Wisconsin
BRRTS #02-16-577207

Dear Mr. Miller,

On February 5, 2019 Mr. John McCarthy of Environmental Troubleshooter, Inc. (ET), on behalf of TGas Real Estate Holdings LLC (TGas), submitted a Site Investigation Report (SIR) to the Wisconsin Department of Natural Resources (DNR) Remediation and Redevelopment Program. The SIR is associated with the Como Oil & Propane – Fagerlin/Heehn facility, BRRTS #02-16-577207 (Site).

A request for technical assistance, including appropriate fees, was made by ET on March 4, 2019. The request was for a technical review of the SIR. This correspondence is in response to the technical assistance request.

A summary of administrative and management events regarding the Site are as follows:

- Notification for Hazardous Substances Discharge (Form 4400-225) was provided to the DNR by ET on May 19, 2016. The notification was in response to information gained through a Phase II Environmental Site Assessment (ESA) performed at the Site by ET.
- The Phase II ESA found that polynuclear aromatic hydrocarbons (PAHs) were discharged to the environment at the Site.
- A correspondence from DNR to Diversified Enterprises LLC (DE) of Cambridge, Minnesota dated July 13, 2016 indicated DE was the responsible party associated with the hazardous substances discharge. The correspondence summarized actions required of DE under Wisconsin Statute § 292.11.
- An initial SIR by ET was submitted to DNR on August 3, 2017.
- A revised SIR was submitted by ET to DNR on February 5, 2019.
- The Site is the location of a previously closed BRRTS listed site (#02-16-110461). This site was closed with no continuing obligations or restrictions in 1999.

Site Investigation Activities:

The following is a summary of site investigation activities:

- In August 2015, five (5) direct push soil borings were advanced at the Site, GP-1 through GP-5. A hand auger boring, HA-1, was also performed at that time.
 - The soil borings were advanced to between 4 to 16 feet below ground surface (BGS).
 - A minimum of one (1) soil samples from each boring was submitted for laboratory analysis of gasoline range organics (GRO), volatile organic compounds (VOC) and PAH.
 - A temporary groundwater monitoring well was installed in boring GP-3. A groundwater sample from the temporary well was submitted for laboratory analysis of VOCs and PAHs.
- Due to finding of the August 2015 investigative efforts, 4 additional borings, GP-4B and GP-6 through GP-8, were advanced at the Site in October 2017.
 - GP-4B was advanced to 16 feet BGS, the other borings were advanced to 4 feet BGS
 - One (1) soil sample from each of the borings was submitted for laboratory analysis of PAHs.

Site Investigation Findings:

The following is a summary of site investigation findings:

- Site is zoned commercial per the ESA.
- The Site has been utilized as a bulk fuel distribution facility for many years.
- Two (2) non-municipal water wells are located in the area, one approximately 100 feet northeast of the Site and one 1200 feet southeast of the Site. Both wells are over 300 feet deep.
- Site soil conditions consist predominantly of 1 to 3 feet of fill material over native clay. There are gravel and asphalt paved surface areas at the Site.
- Groundwater was only encountered in 1 boring, GP-2, at approximately 8 feet BGS. This boring was advanced to a maximum depth of 12 feet BGS, clay was not encountered in that boring.
 - A groundwater sample collected from a temporary well in GP-3 was laboratory analyzed for VOCs and PAHs. Nearly all results were less than method detection limit (MDL). Several PAH results were laboratory “J” flagged (result estimated, between MDL and method reporting limit (MRL)).
- All soil sample laboratory results for VOCs and PAHs were either below method detection limits (MDL) or “J” flagged except for result of soil sample GP-4.
 - The laboratory results from the soil samples from GP-4, GP-6 and GP-8, collected between 0 to 2 feet BGS, exceed Wis. Admin. Code ch. NR720 Protection of Groundwater Residual Contaminant Levels (GW-RCL) and Non-Industrial Direct Contact RCL (Non-Ind. RCL) for PAH compounds.
 - The February 4, 2019 SIR states the specific source of the PAH contamination found in GP-4 was unknown. GP-4 is located near North 6th Street, outside of the main operations area of the Site and the SIR indicates the soil contamination is from fill material or aeolian deposition.
 - Laboratory data from samples collected in borings GP-6 through GP-8 were less than MDL. These borings surround indicate contamination is limited to soil around GP-4.
- The SIR indicates vapor intrusion is not an issue at the site as no VOCs have been detected.

The February 4, 2019 SIR concludes the contamination is limited to shallow soil along North 6th Street and most likely from sources outside of the Site property. Groundwater was only encountered in 1 boring (GP-3) and was not impacted by VOCs or PAHs. The SIR recommends no additional investigative efforts or remedial actions are required at the Site and if the DNR concurs with those conclusions a closure request would be submitted.

Review of Site Investigation:

The review of the SIR is to determine compliance with Wis. Admin. Code ch. NR 716, *Site Investigation*, the purpose of which is as follows:

- Define the nature, degree and extent of contamination.
- Define the source or sources of contamination.
- Determine (and allow) whether any interim actions, remedial actions or both are necessary at the site or facility.

Below are review comments;

- The Department concurs that PAH compounds are the chemicals of concern.
- With the available data it appears there is no specific source that the soil contamination at GP-4, GP-6 and GP-8 can be attributed to. It is reasonable to speculate that the source may not have been from Site specific operations.
 - However, it is noted that no shallow soil samples (0-2' BGS) from GP-1, GP-2, GP-3 and GP-5 were laboratory analyzed.
- The horizontal extent of soil contamination of shallow soil has not been reasonably defined. Further investigation efforts are required to define the degree and extent of contamination.
- The effort to obtain groundwater at the Site has been reasonable. The native clay underlying the Site has very low permeability and groundwater availability is limited. The one groundwater sample collected and analyzed was not impacted by VOC or PAHs.

If you have any questions or comments regarding this project, please feel free to contact me at 715-623-4190 ext. 3115 or at john.t.hunt@wisconsin.gov. I will be happy to assist you in getting this project through to site closure.

Sincerely,



John T. Hunt
Hydrogeologist
Remediation & Redevelopment Program

cc: John McCarthy, Environmental Troubleshooters (email)