

From: [Paddock, Jeffrey J - DNR](#)
To: [Saari, Christopher A - DNR \(Christopher.Saari@wisconsin.gov\)](#)
Subject: FW: Additional Information - NAR determination - Stetsonville Oil, Clark station, 115 STH 13, Stetsonville, WI
Date: Friday, April 22, 2022 1:05:00 PM

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Jeff Paddock

Phone: 715-828-8544

Jeffrey.Paddock@Wisconsin.gov

From: Paddock, Jeffrey J - DNR
Sent: Wednesday, April 20, 2022 2:34 PM
To: Andrew James <ajames@endeavorenv.com>
Cc: Joe Ramcheck <jramcheck@endeavorenv.com>
Subject: RE: Additional Information - NAR determination - Stetsonville Oil, Clark station, 115 STH 13, Stetsonville, WI

Hi Andy,

The DNR was able to review the e-mail below and had the following comments:

- The e-mail states that benzene concentrations of SMW-2 and SMW-3 range from 400-800 ppb and 1,000-2,000 ppb respectively. The 2022 results were more in line with results in SMW-2 & SMW-3 from 1994-2008, not so much from 2009-2010. The final sample from SMW-2 was 25.1, and ranged from <0.41 to 840 ppb in 2009 & 2010. The final sample in SMW-3 was 550, and ranged from 158-800 ppb in 2009 & 2010.
- Naphthalene concentrations are significantly higher in the 2022 samples.
- The new sampling locations are not in the exact location of previous samples, and are therefore difficult to correlate.

Based on the 2022 analytical results and the age of the onsite USTs, we think that this is likely a new release. We would be able to discuss via phone tomorrow or Friday if you would like additional detail. We would also be able to provide a more detailed written analysis if you were to submit a request for a technical review with the applicable fee.

Thank you

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Jeff Paddock

Phone: 715-828-8544

From: Andrew James <ajames@endeavorenv.com>

Sent: Tuesday, April 12, 2022 12:37 PM

To: Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>

Cc: Joe Ramcheck <jramcheck@endeavorenv.com>

Subject: Additional Information - NAR determination - Stetsonville Oil, Clark station, 115 STH 13, Stetsonville, WI

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Mr. Paddock,

Endeavor Environmental Services Inc. (Endeavor) is providing an update based on conversations with DNR regarding the request for No Action Required determination related to the 2022 Phase II Environmental Site Assessment (ESA) at the Stetsonville Oil, Clark station located at 115 STH 13, in the Village of Stetsonville, Taylor county, Wisconsin.

The property is the location of a closed BRRTS LUST case, Stetsonville Oil, (BRRTS # 03-61-000357). Looking at the attached figure 1, you will see the detailed map of the closed site. The current site configuration is similar to the configuration on figure 1, with the onsite building located to the west of the pump island canopy which is located immediately adjacent to STH 13. Residual soil and groundwater (GW) impacts for the closed case are extensive (as shown on the attached figure 2 and figure 3, maps) and encompass the GP-4 and GP-5 locations of Endeavor's 2022 Phase II ESA. Historic residual concentrations of soil contamination in the vicinity of the 2022 ESA performed by Endeavor are represented by historic borings TB-4, TB-8, TB-11, TB-14 & MW-2, and are shown on the attached Table 1. When comparing the location of these borings to the location of GP-4 and GP-5 from Endeavor's 2022 ESA, the contaminant concentrations and constituents are similar. You will note the relative low concentrations of benzene in comparison to the heavier volatile substances. This was not only a characteristic of the historic release but also suggests that a new release (as a potential source for elevated benzene concentrations) has not occurred.

GW contamination for the closed case in the vicinity of Endeavor's 2022 ESA is represented by historic wells SMW-2 and SMW-3, which are upgradient and downgradient wells (respectively) to Endeavor's current groundwater sample locations GP-4 and GP-5. The GW concentrations of PVOCS in GP-4 and GP-5 show similar elevated compounds to that of the historic soil contamination; the heavier volatiles are elevated in relation to benzene concentrations. Furthermore, the GW results of Endeavor's ESA are similar to the concentrations observed in SMW-2 and SMW-3 of the closed case. The last 10 years of GW sampling of the closed case report benzene from approximately 2,000 ppb to no detect in the upgradient well SMW-2. SMW-2 generally reported concentrations of benzene around 400 to 800 ppb and is also upgradient of the source area for the closed case. SMW-3 was

downgradient of the historic release as well as downgradient of Endeavor's 2022 ESA. The concentrations reported from SMW-3 are similar to the concentrations reported in GP-4. In general benzene concentrations in SMW-3 are around 1,000 – 2,000 ppb. Elevated xylene is present in the GP-4 GW sample. There may be several factors contributing to elevated xylene in this sample. GP-4 and GP-5 were both temporary monitoring wells. Temporary well results may differ from permanent 2" monitoring wells. Additionally, soil from the historic TB-11 sample location of the closed site is in the immediate vicinity of GP-4 and GP-5. Soil from this location was not excavated and contained xylene concentrations of 31,300 ppb. GW table fluctuations could inundate the residual soil contamination thereby mobilizing these compounds over time. Finally, xylene is a heavy volatile and therefore tends to persist over time as other lighter volatiles degrade. Xylene's relative stability in comparison to other more volatile compounds, as well as the presence of a soil source in the immediate vicinity could also contribute to the concentrations of xylene we see in the GP-4 GW sample.

Therefore, it is the opinion of Endeavor that the contamination identified in Endeavor's Phase II ESA represents contamination from the closed LUST case Stetsonville Oil, (BRRTS # 03-61-000357) based on the location and concentrations of historic contamination in comparison to the concentrations and locations of GP-4 and GP-5. Endeavor's Phase II ESA did not report exceedances outside of the areas of known contamination nor did the concentrations indicate that a new release has likely occurred. Endeavor respectfully recommends this for a No Action Required determination.

Thank you for your consideration.

Sincerely,
Andy J

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