WISCONSIN
DEPT. OF NATURAL RESOURCES

George E. Meyer
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

3550 Mormon Coulee Road
State Office Building
La Crosse, WI 54601
TELEPHONE 608-785-9000
TELEFAX 608-785-9990

March 27, 1995

FILE COPY

File Ref: ERP ID #309.WD
LUST ID #391.WD
La Crosse County

Mr. Terry Jagiello
Mobil Oil Corporation
Joliet Refinery
P.O. Box 874
Joliet, IL 60434-0874

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SUBJECT: NOTICE OF VIOLATION: Soil and Groundwater Remediation, Mobil Oil, La Crosse Bulk Plant Terminal 48020, 35 Copeland Avenue, La Crosse, WI

Dear Mr. Jagiello:

The purpose of this letter is to inform you that the Department considers Mobil Oil Corporation to be violating the reporting requirements of sections NR 724.11(3) and NR 700.09(1), Wisc. Adm. Code, which require the timely submittal of quarterly progress reports. The last such reports received by this office were received on July 7, 1994, and August 2, 1994. On February 14, 1995, I received a phone call from Mr. Mark Lovejoy, of Montgomery Watson. Mr. Lovejoy requested a two week extension to the deadline for submitting the annual report. The request was granted, and the report should have been submitted on or around February 28, 1995. To date no reports or progress updates have been received by this office. You have also failed to address my comments and requirements in my December 14, 1994, letter to Mobil.

Please submit the annual O&M report to Ms. Eileen Kramer of our district office no later than April 15, 1995. Ms. Kramer will be managing this case henceforth. Her mailing address is:

Ms. Eileen Kramer
Wisconsin Department of Natural Resources
1300 Clairemont Avenue
P.O. Box 4001
Eau Claire, WI 54702-4001

Additionally, you are required to submit quarterly progress updates to Ms. Kramer per s. NR 724.11(3), WAC, and the attached instruction sheet. The first shall be due on July 15, 1995. Subsequent updates shall be due every three months thereafter on the 15th day of the month.

Additionally, after reviewing the file, it appears you have failed to comply with the reporting requirements of your WPDES permit. I am bringing this to the attention of our wastewater engineer, Mr. Charlie Cameron, who is overseeing that permit.

Please be aware that failure to comply with these requirements will result in additional enforcement actions, which may include an administrative order, referral to the Department of Justice for prosecution, fines and forfeitures.

If you have any questions, please call me at (608) 785-9977 or, after March 31, 1995, Ms. Kramer at (715) 839-3824.

Sincerely,

John C. Storlie
Hydrogeologist

Enclosure: Quarterly Updates

cc Darrel Solberg - WD
Bill Evans - WD
Eileen Kramer - WD
Charlie Cameron - LaX
Doug Bach - Warzyn

-Z -768 134 523

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No Insurance Coverage Provided
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(See Reverse)

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Street and No. P.O. Box 874	
P.O., State and ZIP Code Joliet IL 60434-0874	
Postage	$ .32
Certified Fee	1.10
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	1.10
TOTAL Postage & Fees	$2.52
Postmark or Date 3-22-95	

PS Form 3800, March 1993

STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE, CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES (see front).

1. If you want this receipt postmarked, stick the gummed stub to the right of the return address leaving the receipt attached and present the article at a post office service window or hand it to your rural carrier (no extra charge).

2. If you do not want this receipt postmarked, stick the gummed stub to the right of the return address of the article, date, detach and retain the receipt, and mail the article.

3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.

4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.

5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.

6. Save this receipt and present it if you make inquiry.

102595-93-Z-0478

PS Form **3800**, March 1993 *(Reverse)*

UNITED STATES POSTAL SERVICE

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APR - 4 1995
DNR La Crosse Area

PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE, $300

U.S. MAIL

Print your name, address and ZIP Code here

Shelley Klock, DNR
3550 Mormon Coulee Rd
La Crosse WI 54601
Attn: Mobil Oil Terminal -
Eileen Kramer

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Terry Jagiello
Mobil Oil Terminal
P.O. Box 874
Joliet IL 60434-0874

4a. Article Number

Z 768 134 523

4b. Service Type

☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

3-30-95

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form **3811**, December 1991 ☆U.S. GPO: 1993—352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

QUARTERLY UPDATES FOR CLEANUP OF CONTAMINATED PROPERTIES
Wisconsin Department of Natural Resources
Emergency and Remedial Response Program, 7-94

Quarterly monitoring and status reports should provide sufficient information for Department staff to evaluate the current status of the project. Although quarterly updates should be brief (one or two pages of text), they should include the following information:

1. A brief description of activities that occurred at the site during the three-month reporting period.

2. A discussion section which describes any changes that occurred during the reporting period. This section should also contain any comments from the consultant or the responsible party, including recommendations for change when appropriate.

3. Quarterly updates must inform the Department of significant changes in site conditions such as the discovery or migration of free petroleum product, imminent threats to health or safety, migration of the contaminant plume, etc.

4. Where monitoring wells are present, at least once a year include an updated groundwater contour map using water elevations from the most recent round of measurements. The map should show all wells present at the site and should differentiate between wells constructed in different aquifers. Groundwater contours and elevations at each data point used for contouring should be labeled. A north arrow, contour interval, key and scale should be indicated. Also include a comprehensive table(s) which represents all groundwater elevation and water quality data collected at the site to date. The data should be presented in chronological or reverse chronological order by well or monitoring point and should include the sampling date. In addition to the table, graphic representation of the data, such as a time versus concentration plot and a hydrograph, may be useful.

5. If a soil venting system is being used, summaries of volatile organic compounds (VOCs) and benzene emissions are required annually. These should be cumulative graphs of concentration (in pounds) versus time.

6. If a groundwater pump-and-treat system is being used, actual water table configuration maps and system performance evaluations are required annually. Copies of Wisconsin Pollutant Discharge Elimination System (WPDES) reports should be sent to the DNR project manager, as well as to the Wastewater Program. Estimates of cumulative gallons of water recovered and gallons of dissolved and free-phase petroleum recovered must also be reported on the annual site status report form, as well as summarized in one quarterly report each year.

7. At least once a year, the consultant's evaluation of the investigation and the effectiveness of the cleanup should be summarized. This should include the focus and direction of the project, and the progress toward achievement of the project goals.