State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
1027 W. Saint Paul Avenue
Milwaukee WI 53233

Tony Evers, Governor

Telephone 608-266-2621
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WISCONSIN
DEPT. OF NATURAL RESOURCES

December 10, 2024

Mr. Scott Buckner
Citgo Petroleum Corporation
2316 Terminal Drive
Arlington Heights, IL 60005

Via Electronic Mail Only to sbuckne@citgo.com

KEEP THIS LEGAL DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Case Closure with Continuing Obligations
Citgo Petroleum Corporation
9235 North 107th Street
Milwaukee, WI 53224
BRRTS #: 02-41-000700 , FID #: 241309090

Dear Mr. Buckner:

The Wisconsin Department of Natural Resources (DNR) is pleased to inform you that the Granville Term-Citgo/Jacobus case identified above met the requirements of Wisconsin Administrative (Wis. Admin.) Code chs. NR 700 to 799 for case closure with continuing obligations (COs). COs are legal requirements to address potential exposure to remaining contamination. No further investigation or remediation is required at this time for the reported hazardous substance discharge and/or environmental pollution.

However, you, future property owners and occupants of the property must comply with the COs as explained in this letter, which may include maintaining certain features and notifying the DNR and obtaining approval before taking specific actions. You must provide this letter and all enclosures to anyone who purchases, rents or leases this property from you.

This case closure decision is issued under Wis. Admin. Code chs. NR 700 to 799 and is based on information received by the DNR to date. The DNR reviewed the closure request for compliance with state laws and standards and determined the case closure request met the notification requirements of Wis. Admin. Code ch. NR 725, the response action goals of Wis. Admin. Code § NR 726.05(4), and the case closure criteria of Wis. Admin. Code §§ NR 726.05, 726.09 and 726.11, and Wis. Admin. Code ch. NR 140.

The Granville Term-Citgo/Jacobus site was investigated for a discharge of hazardous substances and/or environmental pollution from above storage tanks (ASTs) located on the western portion of the site. The SI was conducted in areas surrounding the ASTs. The site has operated as a light oil terminal since 1985. Case closure is granted for petroleum volatile organic compounds (PVOCs) and polynuclear aromatic hydrocarbons (PAHs) that were associated with the hazardous substance discharge and/or environmental pollution as documented in the case file. The site investigation and/or remedial action addressed soil and groundwater. There was no remedial action conducted at this portion of the site. Any contamination at this portion of the site will naturally degrade. There are two small areas of the ASTs that have residual contamination that is subject to COs for the-site.

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The case closure decision and COs required was based on the site being used for industrial purposes. The site is currently zoned industrial. Based on the land use and zoning, the site meets the industrial land use classification under Wis. Admin. Code § NR 720.05(5) for application of residual contaminant levels in soil.

SUMMARY OF CONTINUING OBLIGATIONS

COs are applied at the following locations:

ADDRESS (CITY, WI)	COS APPLIED	DATE OF MAINTENANCE PLAN(S)
9235 North 107th Street Milwaukee, WI 53224 (Source Property)	- Residual Soil Contamination - Industrial Soil Standards	

CLOSURE CONDITIONS

Closure conditions are legally required conditions which include both COs and other requirements for case closure (Wis. Stat. § 292.12(2)). Under Wis. Stat. § 292.12(5), you, any subsequent property owners and occupants of the property must comply with the closure conditions as explained in this letter. The property owner must notify occupants for any condition specified in this letter under Wis. Admin. Code §§ NR 726.15(1)(b) and NR 727.05(2). If an occupant is responsible for maintenance of any closure condition specified in this letter, you and any subsequent property owner must include the condition in the lease agreement under Wis. Admin. Code § NR 727.05(3) and provide the maintenance plan to any occupant that is responsible.

DNR staff may conduct periodic pre-arranged inspections to ensure that the conditions included in this letter are met (Wis. Stat. § 292.11(8)). If these requirements are not followed, the DNR may take enforcement action under Wis. Stat. ch. 292 to ensure compliance with the closure conditions.

SOIL

Continuing Obligations to Address Soil Contamination

Residual Soil Contamination (Wis. Admin. Code chs. NR 718, NR 500 to 599, and § NR 726.15(2)(b), and Wis. Stat. ch. 289)
Soil contamination remains at two small areas of the ASTs and consists of low level PVOCs, and PAHs as indicated on the enclosed map, Figure, B.2.b., Residual Soil Contamination, 08/01/2019. If soil in the location(s) shown on the map is excavated in the future, the property owner or right of way holder at the time of excavation must sample and analyze the excavated soil. If sampling confirms that contamination is present, the property owner or right of way holder at the time of excavation will need to determine if the material is considered solid waste and ensure that any storage, treatment or disposal complies with applicable standards and rules. Contaminated soil may be managed under Wis. Admin. Code ch. NR 718 with prior DNR approval.

In addition, all current and future property owners, occupants and right of way holders need to be aware that excavation of the contaminated soil may pose an inhalation and direct contact hazard; special precautions may be needed to prevent a threat to human health.

Industrial Soil Standards (Wis. Stat. § 292.12(6), Wis. Admin. Code §§ NR 726.15(2)(g), NR 720.05(5), NR 727.07(05))
Industrial soil standards (i.e., RCLs) for direct contact apply where soil contamination remains at two small areas of the ASTs, as shown on the enclosed map, Figure, B.2.b., Residual Soil Contamination, 08/01/2019. Samples contained poly aromatic hydrocarbons (PAHs) in concentrations that were less than the industrial direct contact RCLs but exceeded the non-industrial direct contact RCLs.

The land use of the property is restricted to industrial use and may not be used or developed for a residential, commercial, agricultural or other non-industrial use until soil contaminant levels no longer exceed non-industrial direct contact RCLs as the result of additional remediation or natural attenuation and the DNR has reviewed and approved a request to modify this condition of closure.

OTHER CLOSURE REQUIREMENTS

Pre-Approval Required for Well Construction (Wis. Admin. Code § NR 812.09(4)(w))
DNR approval is required before well construction or reconstruction for all sites identified as having residual contamination and/or COs. This requirement applies to private drinking water wells and high-capacity wells. To obtain approval, the property owner is required to complete and submit Form 3300-254, Continuing Obligations/Residual Contamination Well Approval Application, to the DNR Drinking Water and Groundwater program's regional water supply specialist. A well driller can help complete this form. The form can be obtained online at dnr.wi.gov, search "3300-254." Additional casing may be necessary to help prevent contamination of the well.

DNR NOTIFICATION AND APPROVAL REQUIREMENTS

Certain activities are limited at closed sites to maintain protectiveness to human health and the environment. The property owner is required to notify the DNR at least 45 days before and obtain approval from the DNR prior to taking the following actions (Wis. Admin. Code §§ NR 727.07, NR 726.15(2), Wis. Stat. § 292.12(6)).

- Before changing the use of the property to a non-industrial use, when industrial soil standards were applied for closure

The DNR may require additional investigation and/or cleanup actions, if necessary, to be protective of human health and the environment. The case may be reopened under Wis. Admin. Code § NR 727.13 if additional information indicates that contamination on or from the site poses a threat, or for a lack of compliance with a CO or closure requirement.

SUBMITTALS AND CONTACT INFORMATION

Site, case-related information and DNR contacts can be found online in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW); go to dnr.wi.gov and search "BOTW." Use the BRRTS ID # found at the top of this letter. The site can also be found on the map view, Remediation and Redevelopment Sites Map (RRSM) by searching "RRSM."

Send written notifications and inspection logs and monitoring well filling and sealing forms to the DNR using the RR Program Submittal Portal at dnr.wi.gov, search "RR submittal portal" (https://dnr.wi.gov/topic/Brownfields/Submittal.html). Questions on using this portal can be directed to the Project Manager below or to the environmental program associate (EPA) for the regional DNR office. Visit dnr.wi.gov, search "RR contacts" and select the EPA tab (https://dnr.wi.gov/topic/Brownfields/Contact.html).

CLOSING

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact the DNR Project Manager, Amungwafor at 414-208-5874 or e-mail Binyoti.Amungwafor@wisconsin.gov

Sincerely,

Timothy G. Alessi, P.G.
Southeast Region Program Manager
Remediation & Redevelopment Program

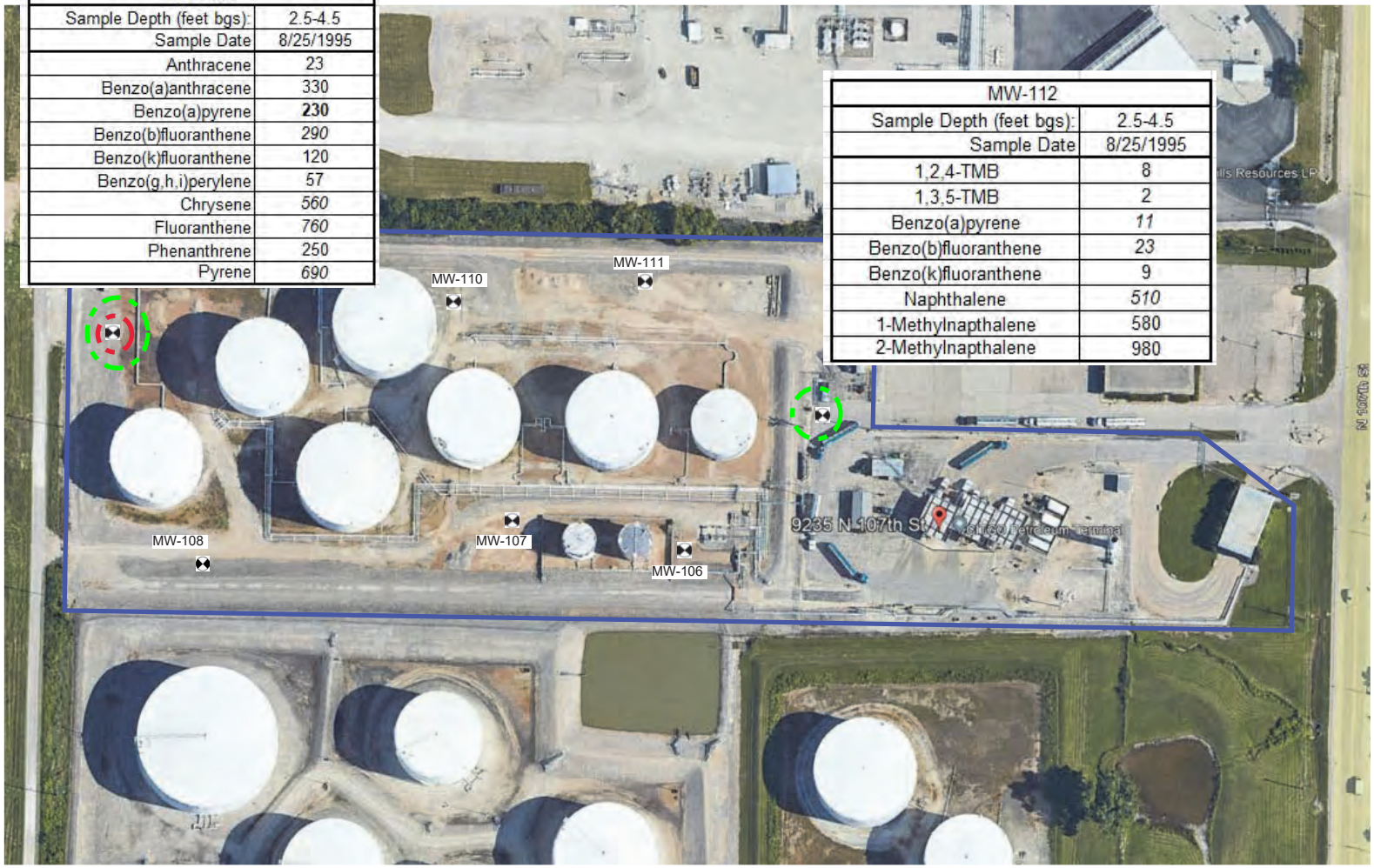
Attachments:
Figure B.2.b., Residual Soil Contamination, 08/01/2019

cc.
Greg Waggle, GES - gwaggle@gesonline.com

Additional Resources:
The DNR fact sheets can be obtained by visiting the DNR website at "dnr.wi.gov" and searching DNR publication number.
Guidance for Electronic Submittals for the Remediation and Redevelopment Program (RR-690)
Continuing Obligations for Environmental Protection (RR-819)
Environmental Contamination and your Real Estate ((RR-973)
Post-Closure modifications: Changes to Property Conditions after a State-Approved Cleanup (RR-987)

MW-109	
Sample Depth (feet bgs):	2.5-4.5
Sample Date	8/25/1995
Anthracene	23
Benzo(a)anthracene	330
Benzo(a)pyrene	**230**
Benzo(b)fluoranthene	*290*
Benzo(k)fluoranthene	120
Benzo(g,h,i)perylene	57
Chrysene	*560*
Fluoranthene	*760*
Phenanthrene	250
Pyrene	*690*

MW-112	
Sample Depth (feet bgs):	2.5-4.5
Sample Date	8/25/1995
1,2,4-TMB	8
1,3,5-TMB	2
Benzo(a)pyrene	*11*
Benzo(b)fluoranthene	*23*
Benzo(k)fluoranthene	9
Naphthalene	*510*
1-Methylnapthalene	580
2-Methylnapthalene	980



LEGEND

- APPROXIMATE PROPERTY BOUNDARY
- CHAIN LINK FENCE
- MONITORING WELL

Estimate extent of soil contamination exceeding Non-Industrial RCLs

Estimate extent of soil contamination exceeding Soil to Groundwater RCLs

Bold values indicate concentration exceeds Non-Industrial RCLs. *Italicized* values indicate concentration exceeds Soil to Groundwater RCLs

Soil contamination detected only at MW-109 and MW-112. Results in micrograms per kilogram.

Data Source: UST and AST Site Investigation Report, Citgo Petroleum Corporation, 9235 North 107th Street, Milwaukee,Wisconsin. Natural Resource Technology, October 26, 1995

Aerial Source: Google Earth

Soil Contamination

Citgo Petroleum Corporation
Milwaukee Terminal
9235 N 107th Street
Milwaukee, Wisconsin

Drawn E.V.
Designed
Approved
Date 08/01/19
Figure B.2.a

Scale In Feet (Approximate)
0 80

GES Groundwater & Environmental Services, Inc.

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