

Minnesota Pollution Control Agency

July 22, 2003

Mr. Jack Curtis
Curtis Oil Company
4997 Miller Trunk Highway
Duluth, MN 55811

RE: Incomplete Petroleum Tank Release Report Notification/Request For Additional Work
Site: Junction Food-N-Fuel, Hermantown, MN
Site ID#: LEAK00003534

Dear Mr. Curtis:

The Minnesota Pollution Control Agency (MPCA) has received an Annual Monitoring Report by Twin Ports Testing dated March 28, 2003. Based on review of this report, it appears the report does not contain information necessary for MPCA staff to complete a review of this site. Additional work is required. Specifically, the MPCA has the following comments and requirements:

- 1) The report did not contain all information requested in our last letter dated December 5, 2002. MPCA are concerned about the following omissions:
 - a) Tables 2 and 3 are not comprehensive and cumulative.
 - b) Tables 3 and 4 must have dates.
 - c) No fluid level measurement data for MW8.
 - d) MW8 ground water elevation data was not used to construct the flow map.
 - e) Monitoring well ground water samples were not analyzed for MTBE.
 - f) Monitoring well construction logs were not included for MW5, MW6, and MW7.
 - g) No boring logs and well construction logs were included for MW2b, MW3b, and MW8.
 - h) Tables 13 and 14 (from Fact Sheet #3.24) were not included.
 - i) These items must be adequately addressed and/or submitted in the next report or the report will be rejected.

- 2) Continue quarterly ground water monitoring measuring fluid levels in and collecting ground water samples from all monitoring wells. Analyze the samples for BTEX, MTBE and GRO except that the second round of samples collected from MW2b, MW3b and MW8 must be analyzed for VOCs and GRO. Continue annual sampling of ground water from PW2. Analyze the samples for VOCs and GRO. Continue quarterly ground water and annual water well sampling until an alternative schedule is approved by the MPCA.

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- 3) Collect ground water samples from the 3 other water supply wells located within 500 feet of the site. Samples should be analyzed for VOCs and GRO. Ground water "Sample Information Forms" must be submitted for all ground water samples in addition to other required items as described in the Fact Sheets.
- 4) Minnesota Rule 7050 and others apply to discharges of contaminated ground water to surface water. Based on a preliminary review, the wetlands and ditch to the North of the site are classified as 2B waters and the following Chronic Standards and Criterion apply:
 - i) Benzene - 114 micrograms per liter (ug/l)
 - ii) Toluene - 253 ug/l
 - iii) Ethyl Benzene - 68 ug/l
 - iv) Xylenes - 166 ug/l
 - v) Naphthalene - 81 ug/l
 - vi) GRO and/or DRO - 200 ug/l (Criterion)

Standards and Criterion are typically applied to a compliance point, e.g., a boring or well, located close to the receiving water, along the flow path from the contaminant source to the receiving water. Based on provided information, it appears that MW8 can be considered a compliance point, however, submitted flow maps indicate variable ground water flow directions. Please have your consultant provide rationale and recommendations for whether additional monitoring well installations are necessary north of the site.

Discharge Standards and Criterion are exceeded in the MW8 ground water sample indicating that petroleum contaminated ground water is discharging to surface water. If confirmed, your consultant should provide corrective action recommendations for mitigating this discharge.

- 5) High concentrations of dissolved petroleum were detected in MW3b. Additional work is needed to delineate the extent of contamination to the west, southwest, and south of MW3b.
- 6) An Annual Monitoring Report documenting completion of the above work must be submitted by April 30, 2004.
- 7) An Excavation Report documenting removal of the 3 USTs during November 2002 must be submitted within 30 days of the date of this letter.
- 8) An Excavation Report documenting soil removal during site development activities during late 2002, including removal of approximately 80 cubic yards for treatment, must be submitted within 30 days of the date of this letter. Please include all information and invoices regarding treatment of this soil.

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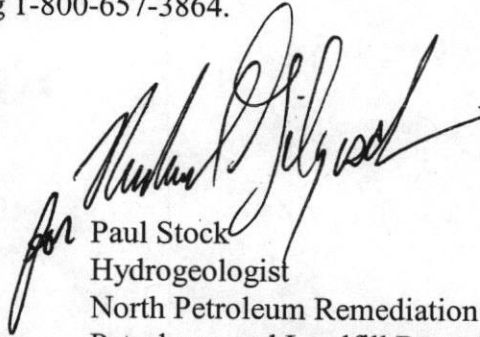
The MPCA staff request that the work be completed according to the deadlines listed above. Failure to meet these deadlines in a timely manner may result in reductions in Petrofund reimbursement or lead to MPCA enforcement actions. Please note the information we are requesting are supported in fact sheets. Please further note that because Petrofund rules specify the maximum levels of efforts for completing these tasks, the Petrofund may not support additional reimbursement for providing the MPCA with above requested information if costs associated with completing these tasks will exceed the Petrofund's allotted maximum amount.

If you have any questions regarding this letter, please contact Sarah Henderson, project manager, at (651) 296-7824 or Paul Stock, staff hydrogeologist, at (218) 846-0473. If you are calling long distance, you may reach the MPCA by calling 1-800-657-3864.

Sincerely,



Sarah Henderson
Project Manager
Petroleum Remediation Unit
Petroleum and Landfill Remediation Section
Majors and Remediation Division



Paul Stock
Hydrogeologist
North Petroleum Remediation Unit
Petroleum and Landfill Remediation Section
Majors and Remediation Division

SH:PS:tf

cc: Brian McVean, Twin Ports Testing, Inc.
Petrofund Staff, Minnesota Department of Commerce, St. Paul