



Minnesota Pollution Control Agency

Detroit Lakes Office

December 27, 2006

Mr. Jack Curtis
Curtis Oil Company
4997 Miller Trunk Highway
Duluth, MN 55881

RE: Request for Additional Work
Site: Junction Food-n-Fuel, 5493 Miller Trunk Hwy., Hermantown, MN
Site ID#: LEAK00003534

Dear Mr. Curtis:

The Minnesota Pollution Control Agency (MPCA) staff have reviewed Twin Ports Testing's August 28, 2006, letter report titled "Conceptual Corrective Action Design – Soil Excavation".

MPCA staff have completed additional evaluation of the LIF boring data. MPCA staff can not provide approval of the conceptual corrective action design for the proposed excavation as the excavation does not appear to target removal of deeper and apparently fresher gasoline non-aqueous phase liquid (NAPL) that appear to have contributed and be contributing to the high dissolved gasoline concentrations observed in monitoring wells MW1, MW2a, MW2b, and, presumably, the lower concentrations seen at monitoring wells MW5 and MW8. Further MPCA staff note that some of the LIF borings may not have been drilled deep enough to encounter the deeper NAPL and the extent of deeper NAPL is not delineated to the east and east-northeast of LIF borings 22 and 31. In other words, MPCA staff believe that an excavation focused on removing the more shallow highly weathered NAPL may have minimal long-term affect on reducing concentrations discharging to the wetland near MW8. MPCA staff will further consider corrective action requirements for discharge of contamination to surface water upon review of additional data, and considering risks to aquifers and nearby water wells, as well as vapor intrusion risks.

Based upon the information provided in the report, it has been determined that additional work is required at the above-referenced property. Specifically, the following activities should be conducted at the site:

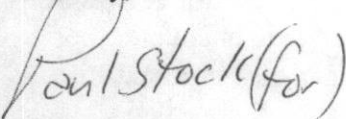
1. The MPCA notes that a Annual Monitoring report documenting continued quarterly ground water monitoring, continued nearby water well sampling, continued surface water observations, and sub-slab soil gas and possible indoor air sampling is due on or around December 31, 2006. Upon review of that report, the MPCA will inform you of any additional work requirements. In the interim, continue previously required monitoring activities.

2. Collection of ambient outdoor air samples is required only in conjunction with collection of indoor air samples, not during collection of sub-slab soil gas samples.
3. It has come to the attention of the MPCA that the water well located a 4621 Lindahl Road (Texas Rust Free Auto) has been recently repaired and can now be sampled. The well is reportably a little over 60 feet deep. Further, it is our understanding that the well may have been sampled once by another party and petroleum contamination was detected. Begin quarterly sampling of this water well. However, it is possible that there is or are on-site sources of contamination and this, along with any potential pathways from your Leak Site to the water well, should be considered when evaluating sampling results. Water well samples must be analyzed for VOCs and GRO (not DRO). Carefully document specific water well sampling methods and procedures (e.g., well construction, sample collection point, purge volume, etc.).

The MPCA staff request that the above work be completed including submittal of the soon due Annual Monitoring Report. Failure to meet this deadline in a timely manner may result in reductions in Petrofund reimbursement or lead to MPCA enforcement actions.

If you have any questions regarding this letter, please contact me at 651-296-7824 or Paul Stock, staff hydrologist, at 218-846-0473. If you are calling long distance, you may reach the MPCA by calling 800-657-3864.

Sincerely,



Sarah Larsen
Project Manager
Petroleum Remediation Unit 2
Petroleum and Closed Landfill Section
Remediation Division

SL/PRS:co

cc: Tim Jefferson, Twin Ports Testing, Superior
Minnesota Department of Commerce, Petrofund Staff, St. Paul