



Minnesota Pollution Control Agency

December 5, 2002

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

RE: Request For Additional Work
Site: Junction Food-n-Fuel, 5497 Miller Trunk Highway, Hermantown
Site ID#: LEAK00003534

Dear Mr. Curtis:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the report titled, "2001 Annual Report", dated February 2002. Based upon the information provided in the report, it has been determined that additional work is required at the above-referenced property. The report recommends an additional year of quarterly ground water monitoring. MPCA staff hereby approve the recommendations, subject to the following comments and modifications:

1. The ORC injection appears to have been inadequate to remediate the high concentrations of contamination present at the site and to reduce risks. MPCA staff request that you contact Regenesis to determine whether they warranty or guarantee the results of their product, and inform the MPCA of the results of your discussions.
2. We understand that all tanks at this site have now been removed. Please submit a complete and comprehensive table tabulating all USTs that have been at the site (use Table 1 from Fact Sheet #3.24). Also submit a site map showing the locations of all past USTs and dispensers, clearly indicating which ones were previously removed and the ones which were removed most recently.
3. Submit a complete and comprehensive Table 13 from Fact Sheet #3.24 listing all properties within 500 feet of the site. Also include an appropriately scaled site area map showing the locations above listed properties, cross-referencing the numbers on the table, and showing any water wells located on those properties. In addition, include Table 14 from Fact Sheet #3.24, listing all water wells, and the required information, within 500 feet of the site.
4. Provide an accurate, scaled site map showing the locations of the wetlands and the ditch/creek located to the north of the site.
5. Seal monitoring well MW2 and replace it with a water table monitoring well whose screen straddles the water table. Submit the MDH Well and Boring Sealing Record for MW2.

Describe the circumstances surrounding the "removal" of MW3 and submit a MDH Well and Boring Sealing Record. Replace MW3 with a new water table monitoring well. Assuming that the scale and north arrow on the recent site maps are correct, install a water table monitoring well approximately 110 feet east-southeast of MW4 and 95 feet north-northeast of MW5. Provide separate boring logs, monitoring well construction logs, and MDH Well Records for the new monitoring wells (see MPCA Fact Sheet #3.19). The monitoring well construction logs should clearly identify the length from the top of casing/riser (i.e., measuring point) to the top of screen. Submit monitoring well construction logs for previously installed monitoring wells 5, 6, and 7.


6. Sample ground water from all monitoring wells on a quarterly schedule. Analyze the samples for BTEX, MTBE, and GRO, however, ground water samples from the new monitoring wells, for the first two sampling events should be analyzed for VOCs and GRO. Collect ground water samples from the new site water supply well (also known as PW2) on an annual basis and analyze the water well samples for VOCs and GRO. Complete Sampling Information Forms (see MPCA Fact Sheet #3.23) for all ground water samples and submit them to the MPCA.
7. Submit the MDH Well Sealing Record for the previous site water well (also known as PW1).
8. All future reports should contain a complete and comprehensive "Monitoring Well Completion Table" listing all monitoring wells. All future reports should contain complete and cumulative Water Level Measurement and Analytical Results of Water Samples tables, including data back to 1992.
9. Submit an Annual Monitoring Report including all of the information requested above, to the MPCA within 6 months of the date of this letter. Additional work, including corrective action, may be required. Disposition of the abandoned, unused water well to the west of the station will be referred to the MDH.

The MPCA staff request that the work be completed within 6 months of the date of this letter. Failure to meet this deadline in a timely manner may result in reductions in Petrofund reimbursement or lead to MPCA enforcement actions.

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This site file will soon be transferred to a new MPCA Project Manager (PM). As soon as a new PM is assigned, I will notify you and your consultant with that person's name and telephone number. In the meantime, if you have any questions regarding this letter, please contact me at (218) 723-4897 or Paul Stock, staff hydrogeologist, at (218) 846-0473.

Sincerely,



Steven J. Leppälä
Project Manager
Petroleum and Landfill Remediation Section

cc: Brian McVean, Twin Ports Testing, Inc.

