



Minnesota Pollution Control Agency

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May 18, 2007

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

RE: Request For Additional Work
Site: Junction Food-n-Fuel
Site ID#: LEAK00003534

Dear Mr. Curtis:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the report titled, "2006 Annual Report", dated February 20, 2007. 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) Continue to collect quarterly ground water samples from the monitoring wells associated with this site. The samples must be analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX), methyl-tertiary-butyl-ether (MTBE), and gasoline range organics (GRO).
- 2) Collect annual ground water samples from water supply wells PW-5492, PW-5506A, and PW-5506B. Collect semi-annual ground water samples from water supply wells PW-2 and PW-5497. Collect quarterly ground water samples from water supply well PW-4621. The water supply well samples must be analyzed for volatile organic compounds (VOCs) and GRO.
- 3) Continue to inspect the ditch and the wetlands located along the north side of the site for the presence of a sheen. If a sheen is noted on the wetland or the ditch, contact site hydrologist Kevin Mustonen **immediately** at 218/529-6274.
- 4) Collect semi-annual indoor air samples at Casa Latte. Collect semi-annual soil vapor samples from the sub-slab sampling point installed at Casa Latte. In order to minimize cross contamination, the indoor air samples should be collected prior to the collection of the soil vapor samples. The samples should be collected no more than a few days apart so valid comparisons can be drawn. The soil vapor and indoor air samples must be analyzed for VOCs using EPA Test Method TO-15.
- 5) Conduct an Indoor Air Quality Building Survey at the Casa Latte building as described in Appendix C of Guidance Document 4-01a *Vapor Intrusion Assessments Performed during Site Investigations*. Pay particular attention to the building use, occupancy, and the heating and ventilation systems that are present.

- 6) The following is a list of errors that were noted during the review of this report.
- a. Ground water elevation data for the January 2007 sampling event was not included in Table 2.
 - b. The ground water elevations shown on the ground water flow maps for wells MW-7 and MW-2b do not correspond with the data listed in Table 3 for these wells.
 - c. The relative ground water elevations listed in Table 2 for most of MW-2b's entries and some of entries for MW-5 and MW-6 are shown as having readings accurate to a thousandth of a foot.
 - d. Some of the analytical results shown in Table 3 are given in mg/l instead of ug/L. All of the entries should be listed in ug/L.
 - e. The GRO result listed for MW-1 on 12-27-04 does not correspond with the result shown on the lab report. Subsequently, the corresponding MW-1 GRO Graph does not correspond with the laboratory data.
 - f. Table 6 does not follow MPCA guidance. The data must be presented using Table 17 from MPCA Guidance Document 4-06 Investigation Report Form. Analytical results that are below the method's reporting limits must be listed as such. Spaces should not be left blank.
- 7) After completing four rounds of quarterly ground water sampling along with the other work outlined above, complete and submit MPCA Guidance Document 4-08 *Annual Monitoring Report* detailing the results. This report is due by February 28, 2008.

Failure to meet deadlines listed above 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 Sarah Larsen at (651) 296-7824 or Kevin Mustonen, staff hydrogeologist, at (218) 529-6274. If you are calling long distance, you may reach the MPCA by calling 1-800-657-3864.

Sincerely,



Sarah Larsen
Project Leader
Petroleum Remediation Unit 2
Petroleum & Closed Landfill Section
Remediation Division



Kevin Mustonen
Hydrogeologist
Petroleum Remediation Unit 1
Petroleum & Closed Landfill Section
Remediation Division

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