

Doug Hansen
Utah Department of Environmental Quality
Division of Environmental Response and Remediation
168 North 1950 West, First Floor
Salt Lake City, Utah 84116

May 9, 2008
Project No.: 1241-026A

Subject: *Corrective Action Plan Summary Letter*
Facility Identification No. 2000220, Release Site EMHB

EXECUTIVE SUMMARY

This outline presents the results of the Corrective Action Plan (CAP) meeting that was held at Utah Division of Environmental Response and Remediation on February 07, 2008, regarding proposed corrective action at the C-4 Top Stop located in Gunnison, Utah. Attendees at the meeting included Les Pennington from Wasatch Environmental Inc., with Doug Hansen from the Utah Department of Environmental Quality, Division of Environmental Response and Remediation (DERR), and Craig Larson from Wind River Petroleum. This letter was prepared by Wasatch Environmental, Inc., for Wind River Petroleum.

BACKGROUND

The facility is located at 15 South Main Street, Gunnison, Utah. The former C-4 Top Stop operated as a convenience store and gas station. The site has been vacant and non-functioning since August of 2007. The owner of the Top Stop property is Wind River Petroleum.

On August 8, 2007, gasoline vapors were reported in businesses near the Top Stop convenience store in Gunnison, Utah. On August 9, Wind River Petroleum requested that Wasatch conduct an emergency response and preliminary investigation, which was initiated on August 10. Gasoline vapors were measured in buildings where vapors were reported and were removed from affected buildings by utilizing ventilation fans.

Wasatch oversaw the removal of four underground storage tanks from the site between August 21 and 27, 2007. The dispenser island, tanks and piping were removed.

Between August 15, 2007 and February 14, 2008, borings were completed across the site to identify the lateral dimensions of the plume and in response to reports of vapors at seventeen or more residences and several businesses.

The East and West horizontal soil vapor extraction (SVE) systems were completed on both sides of Main Street on August 29 and September 21, respectively. During November 2007, additional horizontal SVE systems were installed, including the South SVE system, which began operation on November 20, 2007 and the Central SVE System, which began operation on November 27, 2007. A catalytic oxidizer provides emissions treatment for each system.

The South, Central and West Horizontal SVE Systems were expanded by the installation of additional trenching to address additional zones of contamination and to intercept further migration of the plume in the added locations. An SVE system was installed beneath the basement floor slab of the residence at 255 South 100 West Street to mitigate the gasoline vapors beneath the building and was connected to

the South SVE Treatment System on November 21, 2007. A similar system was subsequently installed in the Casino Star Theater and connected to the West SVE System.

On December 4, 2007, a sparge curtain trench was excavated at the leading edge of the groundwater plume. The system was subsequently installed and was activated on January 22, 2008.

Summa canisters were placed in businesses and homes where gasoline odors were reported to identify those that may have been impacted by the release. Sites where photo-ionization detector (PID) readings were detected have been periodically monitored. Other summa canisters have been placed at additional locations where gasoline vapors were subsequently reported.

Additional investigation has been conducted at the leading edge of the groundwater plume. It appears that laboratory results from groundwater samples collected in several monitoring wells in the distal zone may have identified the south/southwest boundary of the plume.

Previous reports describing in detail the above site activities submitted to Utah DERR have included the "Emergency Response and Vapor Abatement Report", submitted December 10, the "Additional Emergency Response and Subsurface Investigation Report", submitted on December 24, 2007, and the "Subsurface Investigation Report", submitted on February 12, 2008.

CORRECTIVE ACTION ALTERNATIVES

The following corrective action alternatives are considered:

- 1) Dig and Haul (removal of contaminated soils) - This alternative is feasible only when the extent of the contaminated soil is limited to a relatively small area surrounding the point of release and does not extend under buildings or off property.
- 2) Pump and Treat involves removal of contaminated groundwater from the subsurface by pumping. It is generally treated before it is discharged. It is often associated with treatment technologies such as Air Stripping and Activated Carbon Filtration. A major component of any groundwater extraction system is a groundwater monitoring program to verify its effectiveness.

Pump and Treat systems were used widely for the remediation of groundwater in the early to mid-1980s. However, the majority of these systems failed to reduce contaminant levels to regulatory standards for a variety of factors, though failure is generally attributed to rebound effects within the contaminated groundwater aquifer, which occurs after the system is turned off and groundwater levels recover. For that reason, the pump and treat alternative is only considered as an adjunct application to be utilized in combination with other alternatives.

- 3) Monitored Natural Attenuation (MNA) is the use of natural attenuation processes within the context of a carefully monitored site cleanup approach that will reduce contaminant concentrations to levels that are protective of human health and the environment within a reasonable time frame. It does not involve any proactive remediation processes.

It is not a viable alternative at the site due to high concentrations of contamination and the fact that contaminant vapors have been detected in businesses and residences.

- 4) Soil Vapor Extraction (SVE) uses vacuum pressure to remove volatile and some semi-volatile contaminants (VOCs and SVOCs) from the soil. The gas leaving the soil may be discharged to the atmosphere or destroyed, depending on concentrations and applicable regulatory air discharge regulations. Extraction wells are typically used at depths of 5 feet or greater. Groundwater pumps may be used in conjunction with SVE to keep groundwater from rising into the unsaturated zone as a result of vacuum pressure, or to

increase the depth of the unsaturated zone. This area, called the capillary fringe is often highly contaminated, as it holds undissolved chemicals, chemicals that are lighter than water, and vapors that have escaped from the dissolved groundwater below. In soils where the contamination is deep or when there is low permeability, injecting air into the soil aids extraction. Because the process creates a continuous flow of air through the soil, it often promotes biodegradation of low-volatility organic compounds that may be present.

- 5) Air Sparging – This is the process of injecting air directly into groundwater. Air sparging remediates groundwater by volatilizing contaminants and enhancing aerobic biodegradation.
- 6) Bioventing - An *in situ* remediation technology that uses naturally occurring microorganisms to biodegrade organic contaminants adsorbed to soils in the unsaturated zone (vadose). Soils in the capillary fringe and the saturated zone are not affected. In bioventing, the activity of the bacteria already present in the soil is augmented by introducing air (or oxygen) flow into the unsaturated zone (using extraction or injection wells) and can be further enhanced by adding nutrients. This alternative is utilized when the product consists of non-volatile, as well as volatile organic compounds.
- 7) Biopiles - A biopile is a bioremediation technology in which excavated soil is mixed with soil nutrients, formed into compost piles, and enclosed for treatment. A biopile system includes a treatment bed, an aeration system, an irrigation/nutrient system and a leachate collection system. Moisture, heat, nutrients, oxygen, and pH are controlled to enhance biodegradation. An irrigation/nutrient piping system is buried under the soil to circulate air and nutrients through the soil. Soil piles can be up to 20 feet high. They may be covered with plastic to control runoff and prevent evaporation and volatilization. Treatment time is typically 3 to 6 months, after which the excavated material can be returned to its original location or be disposed.

This alternative requires the excavation of the contaminated soil, which is unfeasible at this site.

- 8) *In Situ* Groundwater Bioremediation (or bio-augmentation) - A process that encourages growth and reproduction of native microorganisms to enhance biodegradation of organic contaminants in the saturated zone, which are dissolved in groundwater and adsorbed onto the aquifer matrix (soil).

In situ bioremediation generally requires a delivery system for providing oxygen and nutrients to stimulate the metabolism of subsurface microorganisms, which will degrade hydrocarbon molecules.

In a typical *in situ* bioremediation system, air is extracted using one or more wells. In an ideal configuration, a "closed-loop" system would be established. All air and water vapor extracted would be reinjected without treatment and all remediation would occur *in situ*. This ideal system would continually re-circulate the air and water vapor until cleanup levels had been achieved.

The aerobic mode has been proven most effective in reducing petroleum constituents typically present in gasoline and diesel fuel. In the aerobic treatment mode, groundwater is oxygenated by one of three methods: direct sparging of air or oxygen through an injection well; saturation of water with air or oxygen prior to reinjection; or addition of hydrogen peroxide directly into an injection well or into reinjected water.

In general, the aquifer medium will determine hydraulic conductivity. Fine-grained media (e.g., clays, silts) have lower permeability than coarse-grained media (e.g., sands, gravels). Bioremediation is generally more effective in permeable sediments (e.g., sandy, gravelly).

This method normally requires long periods of time to achieve compliance.

- 9) Land Farming - A bioremediation technology in which contaminated soils are mixed with soil amendments such as soil bulking agents and nutrients, and then tilled into the earth. The material is periodically tilled to maintain an aerobic environment. Contaminants are degraded by microbiological processes and by oxidation. Soil conditions including moisture content, aeration frequency, and pH are controlled to optimize the rate of contaminant degradation.

This alternative is applied to excavated soils, which is not a viable option at this site due to the extent and location of the contaminated soil.

SELECTED CORRECTIVE ACTION RATIONALE

A number of the treatment alternatives listed above have been utilized during the project. Alternative 1 (Dig and Haul) was utilized to a limited degree. A relatively small amount of contaminated soil was removed from the site during UST removal and SVE trench installation and was transported to the White Hills Landfill for disposal. In each case, the lower portion of the excavation was backfilled with granular soil to facilitate groundwater monitoring and SVE application.

The Pump-and-Treat alternative has been utilized near the leading edge of the plume. Approximately 50,000 gallons of groundwater have been pumped into above ground tanks. Treatment has consisted of sparging air into the water to remove volatile organic compounds. Extensive laboratory analysis in accordance with regulatory discharge requirements was conducted prior to discharge of the water to the San Pitch River.

SVE Alternative – Due to the emergency nature of the project's development, the volatility of the petroleum product, the high permeability of the sediments beneath the site, the apparently high rate of plume migration, and large plume dimensions, the SVE alternative for corrective action was recommended and approved during the Emergency Response. It has already been successful in removing vapors from buildings and in removing a relatively large amount of product from the subsurface. It is expected that further system operation will continue to effectively remove volatile organic compounds and reduce plume concentrations across the site.

Four soil vapor extraction (SVE) horizontal treatment systems have been installed across the site during and in connection with emergency response and site investigation. The SVE systems include the following:

- East Horizontal SVE System - Installed on the east side of Main Street. The system began operation on August 29, 2007. See Figure 2.
- West Horizontal SVE System - Installed on the west side of Main Street. System operation began on September 21, 2007. See Figure 2.
- South Horizontal SVE system - Installed in an open field adjacent to the north of 255 South 100 West Street property. System operation began on November 20, 2007. See Figure 4.

- Central Horizontal SVE Systems - Installed on the 60 West 200 South property near the north boundary. The system began temporary operation utilizing a generator-powered Catox on November 27, 2007. It was shut down on January 17, 2008 to facilitate replacement of the Catox with a flame oxidizer, and replacement of the generator with a utility power source. The new system began operation on March 4, 2008. See Figure 3.

The SVE systems are the only feasible alternative to extract vapors in the vadose (unsaturated) zone above the water table that have moved into and around foundations and basements of businesses and residences, where excavation is not an option.

At the distal boundary of the plume, a combination air injection/SVE system was recommended to treat both the groundwater and the unsaturated zone. The following system was previously installed due to the close proximity of the San Pitch River:

- Sparge Curtain - Installed in the corral across 100 West Street from the 255 South property. System operation began on January 22, 2008.

The sparge curtain effectively applies several of the above remediation alternatives, since the injection of air into the water table across the entire length of the sparge curtain stimulates aerobic bacterial activity in the groundwater, while at the same time transferring volatile organic compounds from the water to the vadose, where it is extracted by the SVE component. Physical and biological elements therefore combine to provide an accelerated process of contaminant removal and biological degradation. The sparge curtain addresses both groundwater and vadose contaminants, which is the principle reason it was the chosen alternative at the leading edge of the plume—the last and therefore a critical zone of remediation. See Figure 4.

Proposed System Coverage

Due to the extensive elongation of the contamination plume in the direction of groundwater flow, the site has been divided into three areas, primarily for display purposes. For purposes of remediation, the site has been divided into five treatment areas, as dictated by the location of city streets within the plume boundaries. Each treatment system addresses the plume within the boundaries of the block in which it is located. The placement of trenches in each treatment area was further limited by the location of buildings and utilities. The zone of influence has extended under adjacent buildings, as demonstrated in several cases by an immediate reduction of vapors inside buildings upon the startup of SVE systems.

The first priority as treatment systems were being installed was to mitigate gasoline vapors inside affected businesses and residences. The second priority was to intercept the plume as it migrated past each system location, and thereby to truncate the plume and divide it into smaller segments. The zones of influence for each system will be determined first by vacuum testing existing wells that are located relatively close to SVE trenches, and second by installing additional wells as necessary inside plume boundaries and just outside the periphery of the plume. Wells will serve the dual purpose of: 1) monitoring the groundwater plume, and 2) ascertaining the related SVE zone of influence.

It is believed that the systems provide good coverage of the plume with the system trench networks as presently configured. Data obtained from the existing and proposed wells will provide information for adding trenches if necessary and for focusing vapor extraction in specific trenches in the larger trench networks.

Disposition of Extracted Soil Vapors

Vapor Discharge to the Atmosphere

In Late August and Early September 2007, the East and West Horizontal SVE Systems began operation. Laboratory results from air samples collected from the exhaust sampling ports of the two systems indicated that emissions were well below the Division of Air Quality standard of 2.0 pounds of benzene per day.

Vapor Treatment (Destruction) by Catalytic Oxidizer

After complaints of gasoline odors were received, Catalytic Oxidizers were installed on each SVE system to destroy the extracted vapors, rather than discharge them to the atmosphere. The systems thereafter have operated with zero emissions.

Carbon Filtration of Extracted Vapors

In a later phase of the cleanup, when extracted vapors are reduced to below threshold levels, the Catox units will be replaced with dual carbon drum-filters. The carbon filters will remove hydrocarbon vapors from the air stream prior to discharge to the atmosphere. Carbon filters would be sufficient at present to remove vapors, but would not allow calculation of product mass removal, and would require frequent replacement and disposal costs. With either Catox destruction or carbon filtration of gasoline vapors, the systems will operate with zero emissions.

The up-line filter will be checked periodically by summa canister testing of the outlet stream, and will be replaced and disposed of when capacity is reached. The down-line filter will ensure that vapor bleed-through of the up-line filter will not be discharged to the atmosphere. Filter replacement will entail moving the down-line filter to the up-line position and placing a new filter (or new carbon media) in the down-line position.

Vapor Impacts Inside Buildings

Gasoline vapor concentrations have been detected in the basements of buildings at various locations within the plume boundaries. Vapors have been mitigated in the majority of cases. In the Casino Star Theater, gasoline vapors enter the basement within a relatively small zone, which point of entry is apparently through an unidentified conduit. Wasatch has not yet been allowed entry into the basement to fully examine and take the proper steps to channel the vapors to the West SVE system.

Schedule of Summa Tests

It is proposed that monthly monitoring/sampling in homes overlying the plume be conducted on a monthly basis until samples for three consecutive months indicate that indoor air quality standards have been achieved, and thereafter be reduced to quarterly monitoring.

The selection criteria for testing the ambient air in residences was based on an initial report of gasoline odors, followed by an emergency response, in which the residence was inspected for gasoline odor and was tested with a PID as a preliminary determination. Subject residences were then tested through the placement of eight-hour time-lapse summa canisters by which the air inside the residence was analyzed for gasoline vapor constituents.

Currently, a number residences and businesses, for which laboratory results were positive for gasoline constituents vapors, are being monitored periodically. Future reports of gasoline odors will be investigated according to the procedure described above.

Groundwater monitoring

Currently, there are 23 wells across the site, of which 20 wells have been sampled. It is proposed that ten additional wells be completed both along the centerline of the plume and outside the vapor plume boundaries as defined by PID readings. It is further proposed that seventeen existing wells and ten proposed wells be sampled quarterly during the first phase of the project (See Figure 5. Also see Figures 2, 3, 4). Sampling frequency would revert to semi-annual where sample results show stable conditions exist over a period of three months.

Soil Sampling

It is proposed that periodic confirmation soil samples be collected at locations pertinent to each of the five treatment systems/areas, and at time intervals corresponding with each system's progress. Sample times, locations and depths would be selected on the basis of:

- Boring locations and depths where high contaminant concentrations were identified in the past.
- Analytical results obtained from groundwater monitoring well samples.
- Gasoline vapor concentration data obtained during the operation of the SVE systems.

Security Issues

All systems housed inside buildings are secured by lock and key. Trench valves in systems enclosed within fenced compounds will be secured by lock and key to maintain desired system configurations. The compound fences will be secured by lock and key. Alarm systems are installed on each system, which notify maintenance personnel if any system shuts down.

Reporting Requirements

As outlined by Utah DERR, the following items will be reported on a monthly basis:

- A summary of system performance
- A discussion of zones treated
- Contaminant mass (and estimated volume) removal
- Operating conditions
- Air sampling data (summarized on a comprehensive data table and documented with laboratory data sheets and chain-of-custody)

As outlined by Utah DERR, the following items will be reported on a quarterly basis:

- Groundwater monitoring (Groundwater monitoring will be conducted pursuant to Utah Administrative Code rule R311-205.)

Cleanup Standards

The target cleanup levels for the proposed Corrective Action are set in accordance with Utah Administrative Code rule R311-211-6. The Initial Screening Levels (ISLs) and Tier 1 Screening Criteria (See Attachment A) will be followed according to site parameters, i.e., the distance from the contaminant plume to buildings, site boundaries, utility lines, and water wells.

Contingency Plans

The following contingencies are based upon progress or development of the site remediation.

- 1) The systems installed at present were designed to immediately mitigate vapors in crucial locations, to address the areas of contamination, and to intercept future plume migration. At present, system operation has begun to produce positive results, reducing vapors in commercial and residential buildings, and in other subsurface locations where comparative testing has been conducted. System modifications will be made if any of the following developments occur:
 - Complaints of gasoline vapors at additional locations.
 - Additional areas of contamination discovered through further site investigation.
 - The groundwater plume moves beyond the influence of the treatment systems.

The SVE treatment systems and the sparge curtain can be expanded and modified through the installation of additional trenching to address areas outside the present zone of influence. Other modifications can be made by changing valve configurations to focus system operation at specific locations within each trench system.

- 2) Vapor concentrations have been detected in the basements of some buildings located along the west side of Main Street. Should the elevated vapor levels persist following a reasonable period of SVE system operation, it is proposed that SVE wells be installed at selected locations in the basements of affected buildings. Generally, the basements that have been affected have dirt floors, rather than concrete which would present a barrier to the upward migration of vapors.

The proposed SVE wells would be installed by hand auger to the approximate depth of the water table and connected to the West SVE Treatment System.

Permits

The following permits and approvals were obtained during the Emergency Response, Site Investigation, and during the installation of treatment systems:

- 1) Utah Division of Environmental Response and Remediation, Closure Plan Approval for Underground Storage Tanks – Top Stop C-4, Gunnison, Utah
- 2) Utah Department of Transportation, Highway Right of Way Encroachment, Permit Numbers: 4R-072756-0, 4R-082852-0
- 3) Utah Pollutant Discharge Elimination System General Permit for the Discharge of Treated Ground Water – Permit No. UTG790022
- 4) Utah Division of Air Quality Permit (not yet in place)
- 5) Blue Stakes Utility Locating Approval

Upon approval of this CAP Summary Letter, the attached Public Notice will be distributed.

Our services consist of professional opinions and recommendations made in accordance with generally accepted environmental engineering principles and practices. This warranty is in lieu of all other warranties either expressed or implied. Should you have any questions, please do not hesitate to contact us.

Sincerely,

WASATCH ENVIRONMENTAL, INC.


Troy Smith
Project Geologist


Rebecca Studenka
Utah Certified UST Consultant


Les Pennington, P.E.
Principal Engineer

Attachment: Screening Levels and Criteria
Figure 1 – Contaminant Migration Pathways
Figure 2 – SVE Trenches
Figure 3 – SVE Trenches
Figure 4 – SVE Trenches
Public Notice

Copies: (1) Addressee
(1) Wind River Petroleum
(2) Library
(1) Gunnison City

ATTACHMENT A

INITIAL SCREENING LEVELS (November 1, 2005)

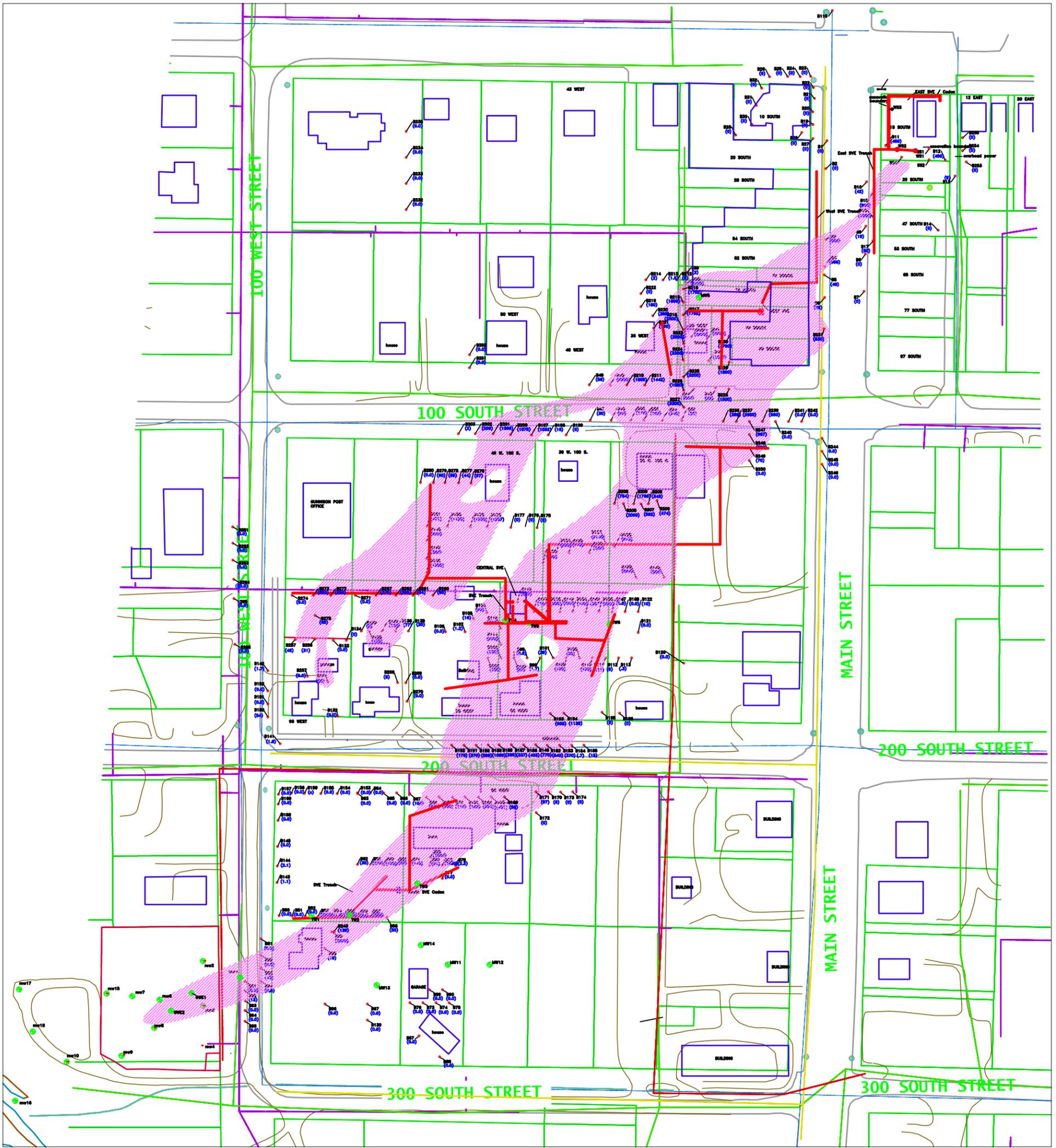
Contaminants	Groundwater (mg/L)	Soil (mg/kg)
Benzene	0.005	0.2
Toluene	1.0	9
Ethylbenzene	0.7	5
Xylenes	10.0	142
Naphthalene	0.7	51
Methyl t-butyl ether (MTBE)	0.2	0.3
Total Petroleum Hydrocarbons (TPH) as gasoline	1	150
Total Petroleum Hydrocarbons (TPH) as diesel	1	500
Oil and Grease or Total Recoverable Petroleum Hydrocarbons (TRPH)	10	1000

TIER 1 SCREENING CRITERIA (November 1, 2005)

Tier 1 Screening Levels are applicable only when the following site conditions are met:

- 1) No buildings, property boundaries or utility lines within 30 feet of the highest measured concentration of any contaminant that is greater than the initial screenings levels but less than or equal to the Tier 1 screening levels; AND,
- 2) No water wells or surface water within 500 feet of highest measured concentration of any contaminant that is greater than the initial screenings levels but less than or equal to the Tier 1 screening levels.

Contaminants	Groundwater (mg/L)	Soil (mg/kg)
Benzene	0.3	0.9
Toluene	3	25
Ethylbenzene	4	23
Xylenes	10	142
Naphthalene	0.7	51
Methyl t-butyl ether (MTBE)	0.2	0.3
Total Petroleum Hydrocarbons (TPH) as gasoline	10	1500
Total Petroleum Hydrocarbons (TPH) as diesel	10	5000
Oil and Grease or Total Recoverable Petroleum Hydrocarbons (TRPH)	10	10000



NOTE: DATA THROUGH April 5TH, 2008

NOTE: WORK IN PROGRESS; THIS MAP MAY BE MODIFIED BASED ON ADDITIONAL INFORMATION

LEGEND

- APPROXIMATE EXTENT OF MAIN MIGRATION PATHWAYS BASED ON PID READINGS AND LITHOLOGY
- SVE TRENCH LINE
- BORING LOCATION



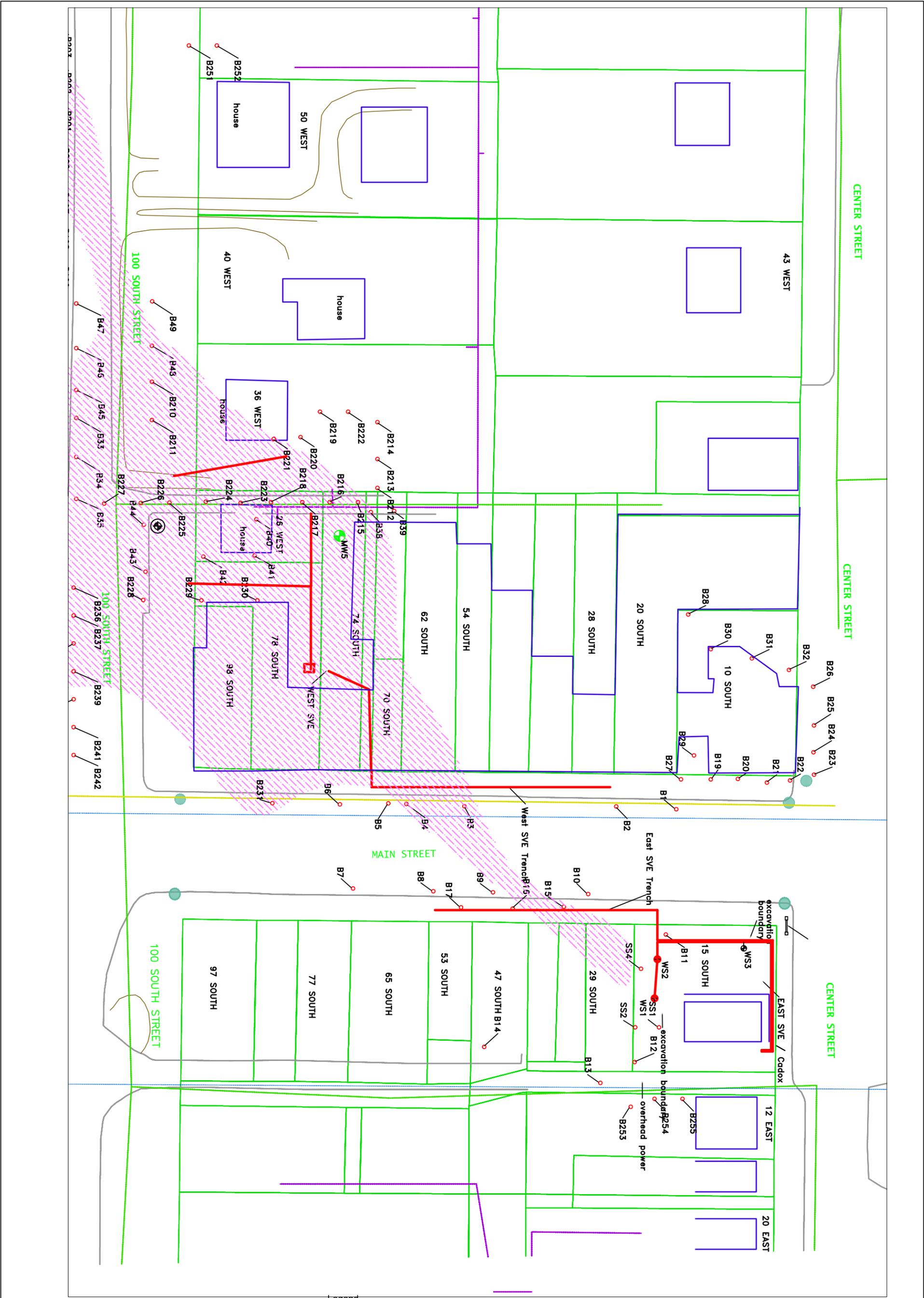
2410 West California Avenue
Salt Lake City, UT 84104
801-972-8400
www.wasatch-environmental.com

CONTAMINANT MIGRATION PATHWAYS

Gunnison, Utah

PROJECT NO.	DRAWING DATE
1241-026A	April 5, 2008

FIG. 1



Legend

— SVE TRENCH LINE



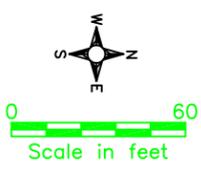
2410 West California Avenue
 Salt Lake City, UT 84104
 801-972-8400
 www.wasatch-environmental.com

SVE TRENCHES

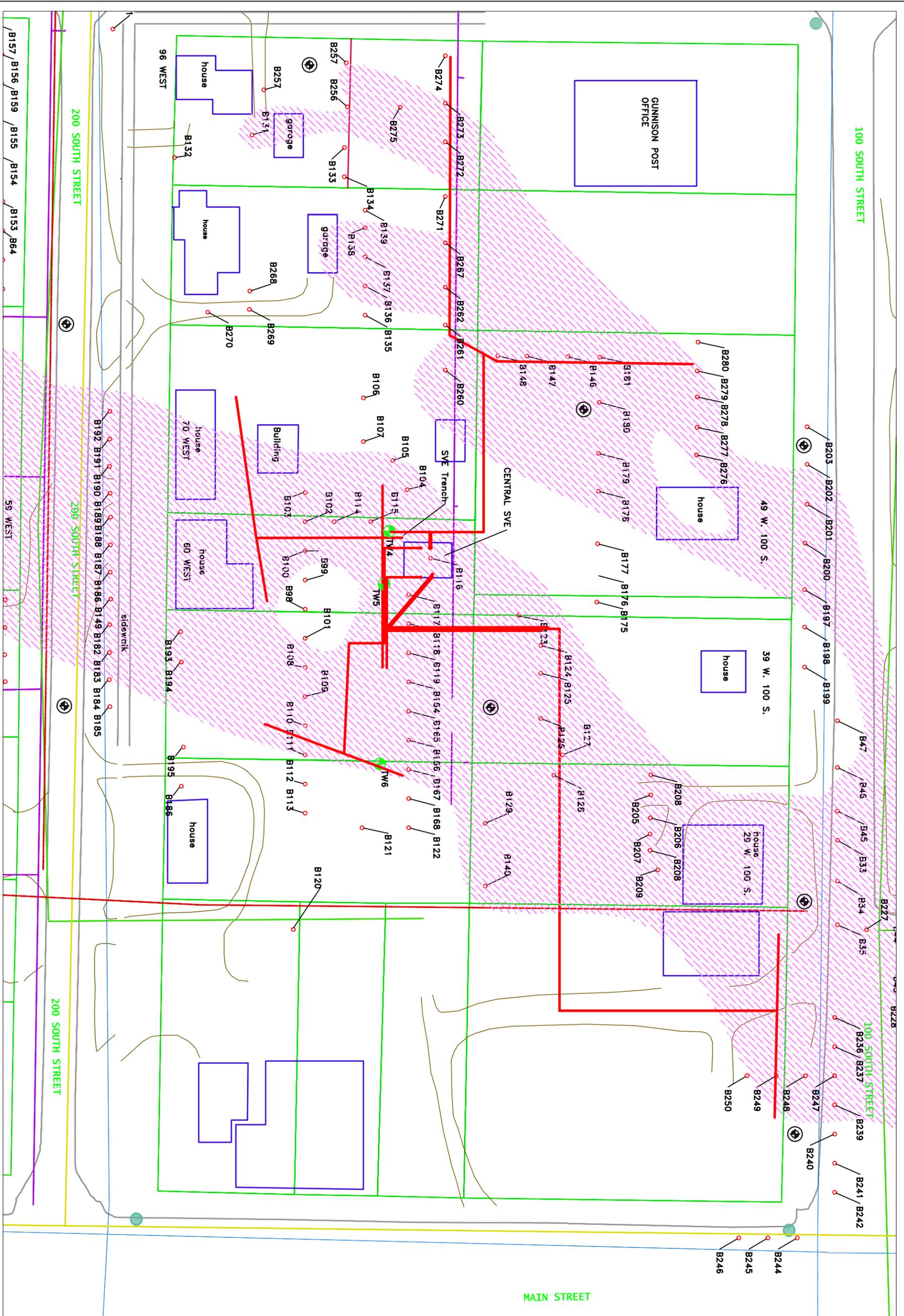
Gunnison, Utah

PROJECT NO.	DRAWING DATE
1241-026A	APRIL 5, 2008

FIG. 2

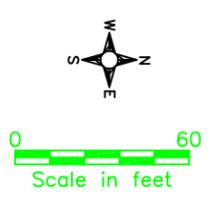


NOTE: DATA THROUGH APRIL 5, 2008



Legend

— SVE TRENCH LINE

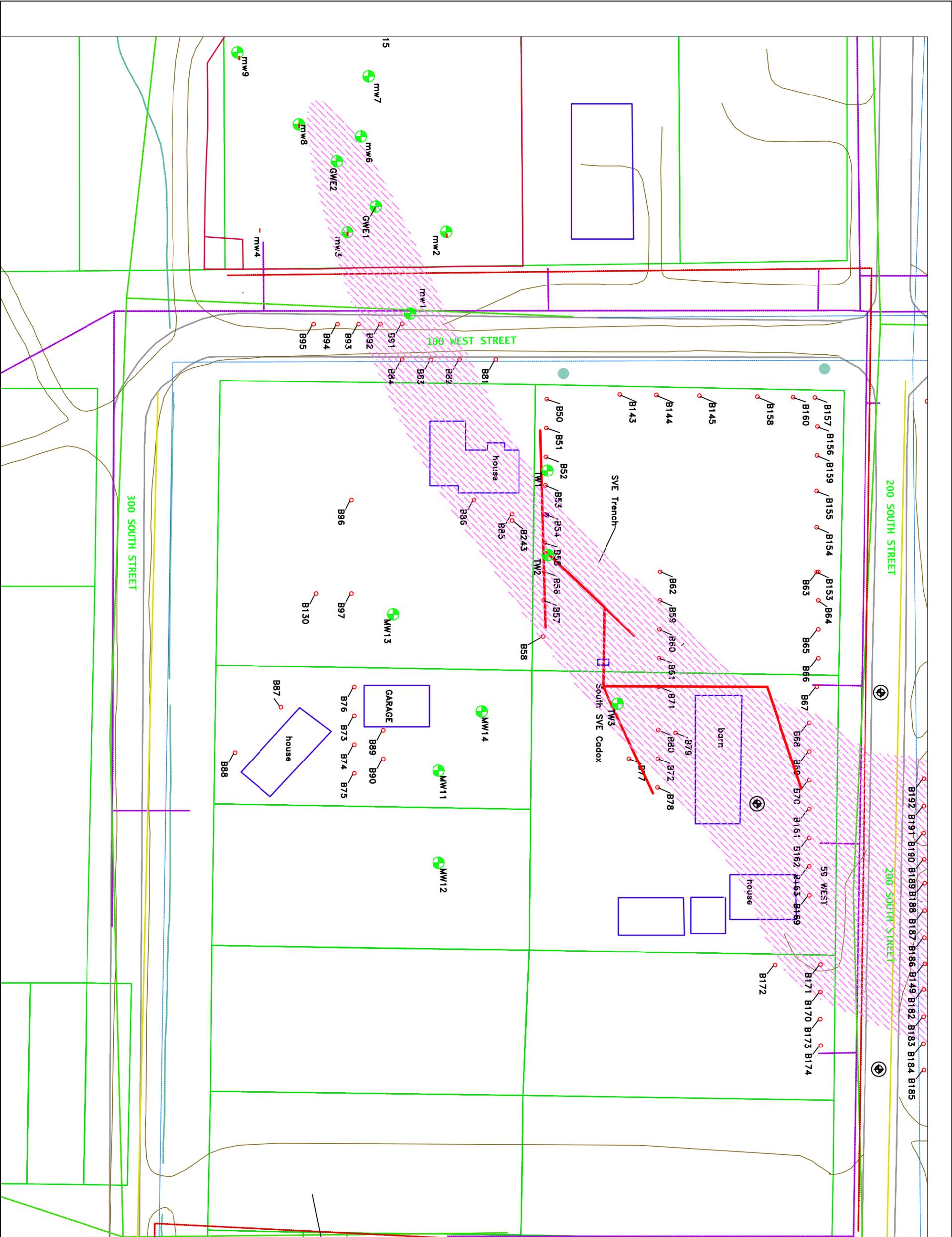


NOTE: DATA THROUGH APRIL 5TH, 2008

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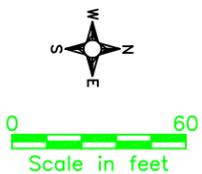
2410 West California Avenue
Salt Lake City, UT 84104
801-972-8400
www.wasatch-environmental.com

SVE TRENCHES		Gunnison, Utah	FIG. 3
PROJECT NO.	DRAWING DATE		
1241-026A	APRIL 5, 2008		



Legend

— SVE TRENCH LINE



NOTE: DATA THROUGH APRIL 5TH, 2008



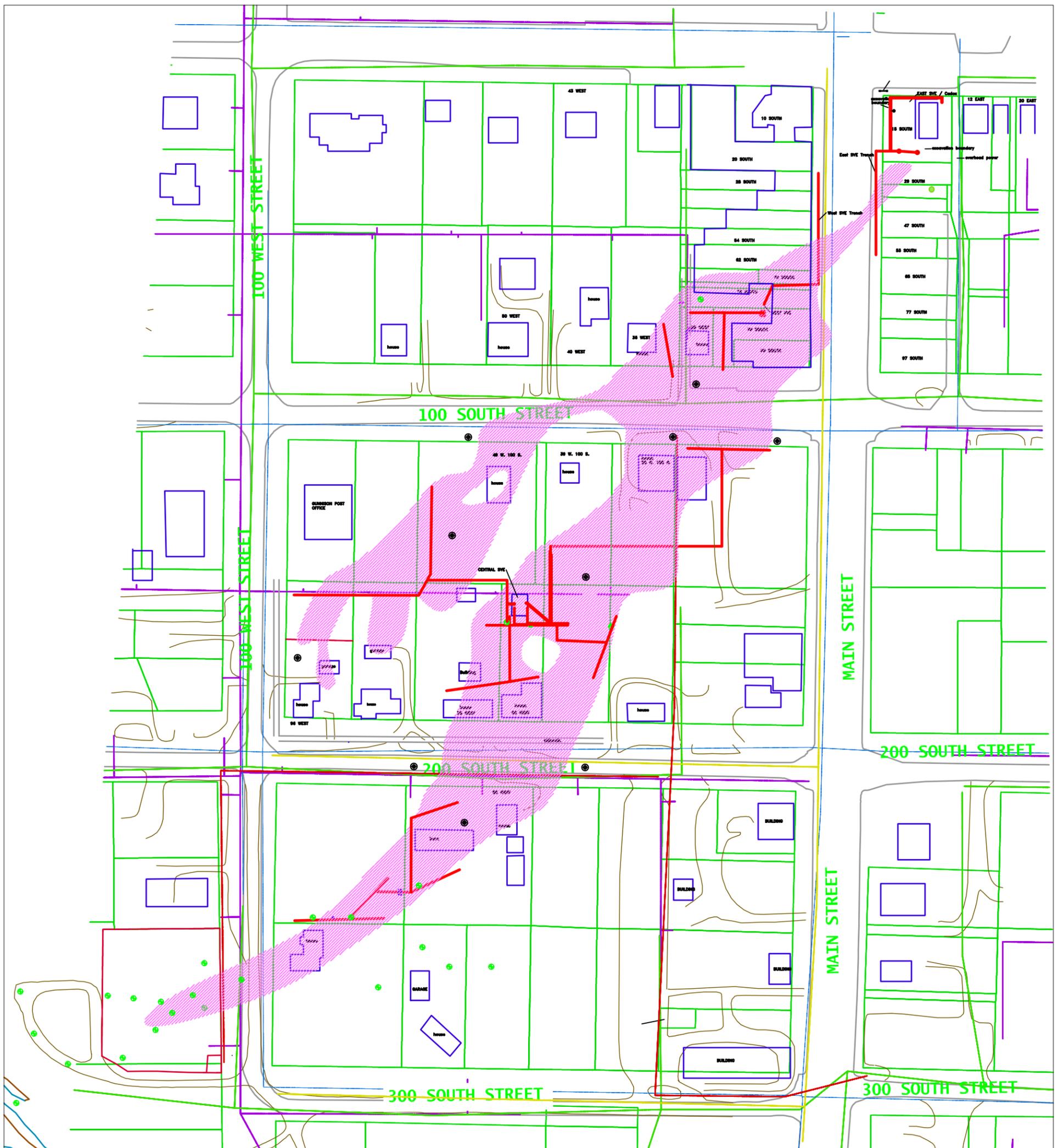
2410 West California Avenue
Salt Lake City, UT 84104
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SVE TRENCHES

Gunnison, Utah

PROJECT NO.	DRAWING DATE
1241-026A	APRIL 5, 2008

FIG. 4



NOTE: DATA THROUGH April 5TH, 2008

NOTE: WORK IN PROGRESS; THIS MAP MAY BE MODIFIED BASED ON ADDITIONAL INFORMATION

LEGEND

- APPROXIMATE EXTENT OF MAIN MIGRATION PATHWAYS BASED ON PID READINGS AND LITHOLOGY
- SVE TRENCH LINE
- PROPOSED MONITORING WELL LOCATION
- EXISTING MONITORING WELL LOCATION



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PROPOSED MONITORING WELLS		
Gunnison, Utah		
PROJECT NO.	DRAWING DATE	FIG. 5
1241-026A	April 5, 2008	

PUBLIC NOTICE

PUBLIC COMMENT PERIOD: May 19, 2008 – June 19, 2008

Start

End

**Leaking Underground Storage Tank Petroleum Cleanup Project
Top Stop Convenience Store, 15 South Main Street, Gunnison, Utah**

Wind River Petroleum Company, at the direction of the Utah Department of Environmental Quality (UDEQ), Division of Environmental Response and Remediation (DERR) is planning to remediate petroleum-contaminated soil (and groundwater) at the former Top Stop Facility. The environmental consultant for this project is Wasatch Environmental, Inc. (Wasatch).

Site Description

The site is located at 15 South Main Street in Gunnison, Utah. The facility formerly operated as a convenience store and gasoline refueling station. It is currently vacant.

A release of product from an underground gasoline storage tank at the site was discovered in August 2007. Between August 2007 and February 2008, Wasatch conducted an Emergency Response to mitigate gasoline vapors in businesses and residences affected by the release, and a Subsurface Investigation to identify the extent of the contamination plume. The plume has moved approximately 1500 feet toward the southwest from the point of release.

Cleanup Measures

The proposed cleanup approach will consist of the following:

- 1) Four SVE Treatment Systems (vapor plume)
- 2) One Sparge Curtain Treatment System—a combination air injection/SVE system (groundwater and vapor plume)
- 3) Periodic Soil, Groundwater, and Air Monitoring

Schedule

As part of the Emergency Response, the above treatment systems were previously installed at several locations across the site, beginning operation at various times between August 2007 and January 2008. The consultant estimates operation of the treatment systems to last between two and five years.

For More Information

A copy of the Corrective Action Plan Summary Letter prepared for this site is attached and is also available at the DERR in Salt Lake City (address below; office hours 8:00 a.m. to 5:00 p.m., Monday through Friday) and at the Gunnison City Hall located at

38 West Center Street, Gunnison, Utah. Comments may be submitted via e-mail to gunnisonleak@utah.gov, or via mail to:

Doug Hansen, Project Manager

Division of Environmental Response and Remediation

168 North 1950 West, 1 Floor, Salt Lake City, Utah 84116

The comment period is open from May 19, 2008 until June 18, 2008.