



State of Utah

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Department of
Environmental Quality

Amanda Smith
Executive Director

DIVISION OF ENVIRONMENTAL
RESPONSE AND REMEDIATION

Brent H. Everett
Director

FILE COPY

ERRL-0859-10

January 3, 2011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SCANNED

Craig Larson, President
Top Stop Convenience Stores
2046 East Murray-Holladay Road, Suite 200
Holladay, Utah 84117

DERR - 2011-001011

Re: Review of the "Summary of Indoor Air and Sub-Slab Soil Vapor Sampling Results - Gunnison, Utah"
Top Stop C-4, located at 15 South Main Street, Gunnison, Utah
Facility Identification No. 2000220, Release Site MHB

Dear Mr. Larson:

The Utah Division of Environmental Response and Remediation (DERR) has completed its review of the "Summary of Indoor Air and Sub-Slab Soil Vapor Sampling Results - Gunnison, Utah" prepared by RMEC Environmental and submitted to us on August 30, 2010, for the above-referenced release site. Thank you for that submittal. As stated in the report "... RMEC is formally petitioning the DERR to stop any further sub-slab or indoor air monitoring." Your state-assigned project manager has reviewed the report and has raised several concerns that must be addressed prior to discontinuing sub-slab or indoor air sampling. Your project manager has therefore prepared the following list of issues and requirements that need to be addressed:

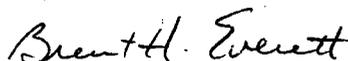
- **60 West 200 South.** Four sampling events have been conducted at this location over a seven month period. This periodic sampling schedule may not be representative of the seasonal fluctuations in both groundwater levels and vapor levels. Also, the third of four samples collected did have benzene at 4.8 ug/m³, and exceeds the proposed target concentrations. Both sub-slab and indoor concentrations have been historically highest in November. Additional sub-slab sampling in conjunction with indoor air sampling at the same time is warranted.
- **26 West 100 South.** The dates on the sample table for this location appear to be incorrect. The last sampling event here indicates benzene in the subsurface at 12.0 ug/m³ collected on May 27, 2010. Additional sub-slab sampling at this location is required.

- Y909 3111
- **44 South 100 West.** Two indoor air samples were collected at this location where benzene concentrations measured 81 ug/m^3 and 25 ug/m^3 . Within two months of the second indoor air sample, a sub-slab sample was collected that had benzene at 11 ug/m^3 . The high indoor numbers were attributed to a gasoline spill in the garage, however the sub-slab concentrations warrant additional sampling. Both sub-slab and indoor air sampling should continue at this location until more evidence is provided that the plume is not contributing to the elevated indoor air contaminant concentrations.
 - **Body Barn.** This sampling location continues to have indoor air and sub-slab benzene concentrations that exceed established and proposed target concentrations. Continued quarterly sampling is necessary and abatement measures will be needed to protect human health and the environment at this location if contaminated levels continue to exceed the standards.
 - **89 West Center Street.** Indoor air sampling at this location was conducted for four events. Benzene concentrations were measured at 130, 17, 20 and 12 ug/m^3 for those events. Sampling was discontinued on the premise that this location is not near the plume boundaries. Additional data presented to DERR indicate there is an abandoned sewer line that is immediately adjacent to and possibly under the home at this location. Additional sampling is required to determine if the utility line is a conduit for contaminant migration into this home.

The report associated with these requirements must be submitted to our office within 30 days from the receipt of this letter. Please continue sampling as requested and submit quarterly Indoor Air and Sub-Surface Soil Vapor Monitoring Status Reports.

If you have any questions regarding this matter, please contact Morgan Atkinson, the DERR Project Manager, at (801) 536-0052.

Sincerely,



Brent H. Everett, Executive Secretary (UST)
Utah Solid and Hazardous Waste Control Board

BHE/MPA/sbw

cc: Bruce Costa, Ph.D., Director, Central Utah Public Health Department
John Chartier, District Engineer, Utah Department of Environmental Quality
John Vercoe, Central Utah Public Health Department
Les Penington, Wasatch Environmental
Lori Nay, Gunnison City
Lance Hess
Frank DeRosso, RMEC