Borski, Jennifer - DNR

From: Borski, Jennifer - DNR
Sent: Wednesday, October 9, 2019 3:28 PM
To: 'Brian Kreski'
Cc: 'Hodgson, Scott A.'; Kelly, Bridget B - DNR; Fassbender, Judy L - DNR
Subject: DNR Response to 2019 Request for Information - PFAS Survey for N W Mauthe Site, 725 S. Outagamie St, Appleton, WI, BRRTS #02-45-000127
Attachments: NW Mauthe PFAS Survey 2019-10-09.pdf

Brian,

Attached is DNR's response to the PFAS Survey for the N W Mauthe Site. (INDUSTRIAL WASTEWATER DISCHARGE PERMIT NO. 18-21)

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Jennifer Borski
Phone: (920) 424-7887
Jennifer.borski@wisconsin.gov

From: Borski, Jennifer - DNR
Sent: Friday, September 27, 2019 4:23 PM
To: 'Brian Kreski' <Brian.Kreski@Appleton.org>
Cc: Hodgson, Scott A. <Scott.Hodgson@terracon.com>
Subject: RE: 2019 Request for Information - PFAS Survey

Hi Brian,

I want to let you know that DNR is working on a response to this survey. I checked in with managers today and they anticipate a response next week but I cannot guarantee that I will get it by Monday, the date you've requested. The response will be forwarded to you as soon as possible.

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Jennifer Borski
Vapor Intrusion Team Leader / Hydrogeologist
Remediation & Redevelopment Program / Environmental Management Division
Wisconsin Department of Natural Resources
625 E. County Road Y, STE 700
Oshkosh, WI 54901-9731
Phone: (920) 424-7887
Cell Phone: (920) 360-0853
jennifer.borski@wisconsin.gov


dnr.wi.gov

From: Brian Kreski <Brian.Kreski@Appleton.org>
Sent: Friday, September 13, 2019 8:12 AM
To: Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>
Cc: Hodgson, Scott A. <Scott.Hodgson@terracon.com>
Subject: 2019 Request for Information - PFAS Survey

Hi Jennifer,

The Wisconsin Department of Natural Resources (WDNR) recently launched a statewide initiative requesting that wastewater treatment plants identify potential PFOA and PFOS (PFAS Substances) within their respective service areas. With that, I have attached the Appleton Wastewater Treatment Plant's survey request letter and forms that should correlate to your specific industry.

Please let me know if you have any questions,

Brian J. Kreski

Brian Kreski
City of Appleton Department of Utilities
Environmental Programs Coordinator
2006 East Newberry Street
Appleton, WI 54915

Office: 920.832.2316
Mobile: 920.419.6735
Fax: 920.832.5949

http://www.appleton.org/government/utilities/wastewater-treatment/compost-program

Electroplaters/metal finishers/circuit board manufacturers

PFAS-containing chemicals, specifically those containing perfluoroctane sulfonate (PFOS) were used by electroplaters as a demister/defoamer/surfactant to control air emissions of hexavalent chromium beginning in the mid-1990s. While hard chrome and decorative chrome platers using hexavalent chrome are the most likely sources, PFAS have also been found in wetting agents and other plating chemicals involving other metals and plastics. Even if used many years ago, PFAS-containing chemicals may persist in plating tanks, etch tanks, sumps, air emission control systems and secondary containment pits. Some chemicals identified as PFOS-free may still contain PFAS. We are still learning about the behavior of these chemicals, and there are concerns that chemical changes may occur in plating and etch baths. Platers in Michigan and Minnesota were found to have PFOS contamination in their wastewater years after they discontinued use of PFOS-containing chemicals.

1. What types of plating are currently performed at your facility?
   None. The Wisconsin DNR does not own the property. The property is listed as a federal Superfund site. The person that caused the contamination at the property is deceased. The United States Environmental Protection Agency (USEPA) performed an investigation and conducted some cleanup actions in 1995-1997. The DNR's role is to operate the system that collects (and historically treated) contaminated groundwater; the DNR performs this function because there is no other party able to do so.

2. What types of plating were previously performed at your facility? Please summarize the plating activities over the last 20 years if possible.
   Based on information received by the DNR, chromium electroplating was conducted from 1960-1976; Zinc, cadmium, copper & possibly silver electroplating was conducted from 1978-1987. Operations operations ceased in 1987.

3. Are or were demisters/defoamers/surfactants used to control air emissions or as wetting agents for any plating or etch tanks? If so, what are the names of the chemicals and amounts and concentrations used? Please provide the SDS/MSDS sheets for these chemicals.
   Unknown

4. Are any other chemicals used in the plating processes known to contain PFAS or PFOS? If so, what are the names of the chemicals and amounts and concentrations used? Please provide the SDS/MSDS sheets for these chemicals and a schematic or flow diagram that shows where each chemical is used.
   Unknown

5. Are there any other fluorinated chemicals used (look for “fluoro” in the SDS/MSDS chemical listing or product name, e.g., “fluorinated surfactant(s)” or “organic fluorosulfonate”)? If so, what are the names of the chemicals and amounts and concentrations used? Please provide the SDS/MSDS sheets for these chemicals and a description of where they are used in your process.
   Unknown

SOURCE: Michigan Department of Environmental Quality Water Resources Division –

Recommended PFAS Screening & Evaluation Procedure for Industrial Pretreatment Programs (IPPs)

Industry sites with soil or groundwater contamination including those where aqueous film forming foam (AFFF) was used:

If your industry or facility has soil or groundwater contamination due to releases of industrial wastes or the use of AFFF (Class B) firefighting foam due to fires or firefighter training that discharges or infiltrates into the sanitary sewers may be a concern.

1. Do you currently have contamination of soil or groundwater due to releases from electroplating/metal finishing processes, the coating/treatment of paper or packaging products, textile, leather or fabric treating, leather tanning operations, the manufacturing of PTFE coatings or other PFAS sources? Please describe below.

   Chromium electroplating occurred from 1960-1976; Zinc, cadmium, copper & possibly silver electroplating occurred from 1978-1987 when operations ceased. Identified contaminants in groundwater above a NR 140 1992 preventative action limit included Cd; Cr+6; CN-; Mn; 1,1,-DCA;1,1-DCE; cis-1,2-DCE; trans-1,2-DCE; 1,1,1-TCA; 1,1,2-TCA & TCE.

2. Has your facility had a fire in which AFFF (Class B) foam was utilized, or has firefighter training occurred on your site using AFFF foam? Please describe below.

   Unknown

3. Have you analyzed your groundwater for PFAS? If so, please provide the results.

   No. Not performed as part of USEPA Superfund investigation in 1991-Feb 1993.

4. Do you have a groundwater cleanup or investigation? Please describe.

   Investigation by USEPA completed Feb 1993. USEPA excavated soil & installed 3 groundwater (GW) collection trenches throughout neighborhood in 1995. GW treatment building constructed in 1996. GW pump & treat system started in Jan 1997. DNR took over operation and maintenance of the system in 1998 from EPA because there was no other party able to act. Treatment continued until April 2006 when City approved direct discharge of collected GW (which was historically below effluent discharge limitations for metals and VOCs). DNR continues collection & discharge.