

Scoping Statement Regarding Emerging Contaminants

Troy Laundry and Cleaners (Former), 320 Pine Street, Sheboygan Falls, WI
BRRTS #02-60-385641

Per Wis Admin. Code § NR 716.07 and Wis. Admin. Code § NR 716.09, site investigation scoping and work plans should include evaluating potential emerging contaminants that were historically or are presently produced, used, handled, or stored at a site. Most notably, emerging contaminants include 1,4-dioxane and per- and poly-fluorinated alkyl substances (PFAS). The evaluation includes any available information on the use of any products containing these chemicals in any services process; the duration of the suspected chemical product use; the type of chemical contained in the product; and any areas of a site where products containing these chemicals may have been used, stored, managed, or discarded.

According to documents prepared by the U.S. Environmental Protection Agency, several State Regulatory Agencies, the Department of Defense, and various other sources of toxic chemical information, dioxane is typically used by industry as a catalytic solvent during the manufacturing of adhesives, resins, oils, waxes, pharmaceuticals, and certain plastics and rubbers. It is also used to stabilize chlorinated hydrocarbons when being transported in aluminum containers. Dioxane is also a known byproduct of the production of polyethylene terephthalate (PET) plastic.

PFAS are very ubiquitous in the environment and occur in many common everyday products such as Teflon® coatings, fast food wrappers and popcorn bags, stain and water repellents, some cosmetics, some insect repellents, and some sunscreen products, to name a few. In the 1940s, the manufacturing of these products incorporated PFAS due to their inherent hydrophobic (water repellent) and non-stick properties. PFAS are also components of fire-fighting foams.

Historical city directory records dating back to 1958 and aerial photographs from 1937 were reviewed to understand the history of use at the former Troy Laundry and Cleaners, 320-326 Pine Street in Sheboygan Falls, Wisconsin (the Site). Development on the Site is visible in 1937, with structures roughly the size and shape of the current structures at the Site. The earliest city directory available (1958) lists Tray (sp.) Laundry and Cleaners at 320 Pine Street, and Wachter Service Station at 326 Pine Street. Beginning in 1968, Troy Laundry and Cleaners and Troy Laundrette (presumably a self-service laundromat) occupied each parcel, respectively. Records indicate use of the Site has been the same since 1968.

The current owner, Marilyn Berlin, has owned the Site since the late 1990s, and operated the dry cleaning business until it closed at the end of 2019. Active dry cleaning ceased in approximately 2008, after which the store acted as a drop-off location for clothes dry cleaned elsewhere. Tetrachloroethene (PCE) was used as a solvent in the dry cleaning process. The dry cleaning machine was located on the first floor of the building over a full basement, and all dry cleaning operations, including storage of virgin and spent solvent and filters, were conducted on the first floor. No activities related to dry cleaning were performed in the basement.

Mrs. Berlin indicated that waterproofing or stain repellent products were rarely used and, if so, in very limited quantities from spray cans. Mrs. Berlin did not remember specific product names. Further, the treatments would have been applied after clothes had been dry cleaned, so the chemicals would not have been released to the sewer, which is the most likely pathway for solvent discharge to the subsurface. A questionnaire completed by Mrs. Berlin is attached.

Conclusion

Reviewed historical records indicate the Site was occupied by a gasoline service station from an unknown date up to the mid-1960s, and a plant-on-premises dry cleaner since at least 1958 through approximately 2008. Per the History and Use of PFAS fact sheet published by ITRC (updated August 2020) there is no known association between PFAS, 1-4-dioxane and petroleum fuel products. Waterproofing and/or stain repellent products may have been used by operators of the dry cleaning business but in a very limited quantity and not a manner that would have resulted in release to the subsurface. The dry cleaning industry has been identified as a potential contributor to PFAS contamination because of suspected PFAS accumulation in dry cleaning waste. At the Site, however, waste was stored inside on the first floor of the building and managed through the front door.

Considering the Site history and operations, minimal detections of known contaminants of concern (i.e. PCE and its associated degradation products), and conceptual site model indicating the sanitary sewer laterals as the most likely sources of release, it is unlikely emerging contaminants are a concern at the Site. No further evaluation or sampling assessments are warranted for the Site.



PFAS Questionnaire

Purpose: The WDNR has requested an evaluation of the potential for use or releases(s) of perfluoroalkyl and polyfluoroalkyl substances (PFAS) at various sites in Wisconsin as part of an evaluation of emerging contaminants.

Background: PFAS-containing products have application in many industries, including consumer products such as carpets, clothing, furniture, outdoor equipment, food packaging. Examples of products *potentially* used in the dry cleaning industry are products applied to fabrics for stain-resistance and waterproofing.

Site Name: Troy Laundry & Cleaners

BRRTS No. or FID: 02-60-385641

Address: 320 Pine St, Sheboygan Falls, WI - *No business at this site*

Interviewer: B. Kappen

Site Representative/Title: Tom and Marilyn Berlin

Current Use of the Site: Self-Serve Laundromat

Historical Site Use(s): Laundry and dry cleaning service; gas station

Please answer the following questions to the best of your knowledge.

1. Are you aware whether any waterproofing products or stain repellants were used at the site at any time?
 - a. If so, what were the trade names of the product(s) and when were they used?

Product Name	When Used	Quantities (estimated)
<i>Have No Idea</i>		



PFAS Questionnaire

2. For any product listed in Question #1, please answer the following:

a. In which area(s) of the site were the products used?

In drying cleaning area

b. In which area(s) of the site were products stored or managed?

In drying cleaning area

c. Describe where and how the products were discarded.

used up

3. For any of the products listed in Question #1, please provide any safety data sheets or other product documentation you may have.

None

4. Please state when you installed secondary containment for the transfer of sludge from the dry cleaning machine still.

5. Describe the process for managing and disposing of sludge. Attach any waste disposal manifests if available. Please indicate if your site used a third party waste disposal service at any time.

Safety Clean, was put in barrels and picked up by Safety Clean.

6. Describe the location and purpose of any condenser or dry cleaning vents to the outdoors.

In the basement

By signing below, you are certifying that this information is true and accurate to the best of your knowledge.

Signature

Marilyn J. Berlin

Printed Name

Marilyn J. Berlin

Date 1-14-21