Scoping Statement Regarding Emerging Contaminants

Former Gunderson Cleaners, 118 High Avenue, Oshkosh, WI BRRTS#: 02-71-467002

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 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. The dry cleaning industry has been identified as a potential contributor to PFAS contamination because of suspected PFAS accumulation in dry cleaning waste. EnviroForensics' research of waterproofing/ stain repellent products used at dry cleaner sites indicates that many of the commonly used products didn't contain PFAS.

Site use history was summarized in the 2009 Site Investigation Report, reiterated herein. Portions of the site were previously occupied by a dwelling and a paint and wallpaper shop and warehouse as shown on the 1903 Sanborn map (attached). A building identified as Kings Laundry on the 1932 Sanborn map was reportedly constructed in the 1920s. That building was eventually expanded and absorbed the paint and wallpaper business structures.

According to Mr. Gary Gunderson, dry cleaning was performed at the site from approximately the mid-1940s through the mid-1980s. Stoddard solvent and tetrachloroethene (PCE) were used for cleaning. In 2012, the building was razed and a remedial excavation was completed.

EnviroForensics interviewed Gunderson Cleaners representatives regarding the scope of operations at the site, which ceased more than 35 years ago. There are no specific records available; however, Gunderson does not recall offering waterproofing/stain repellent services. Rather, these services may have been offered at the former store in Neenah (BRRTS# 02-71-467001). In that case, garments would have been transferred between the stores for application of the products.

Conclusion

The site has been occupied by a paint and wallpaper store and laundry/dry cleaner since the time the emerging contaminants in question were developed. There is no history of manufacturing, and no reason to suspect 1,4-dioxane would have been used, stored, or discarded at the site.

Gunderson cleaners does not recall using, storing, or discarding waterproofing or stain repellent products, which represent the most likely source of a PFAS release. Considering the site history and operations, the release of PFAS to the subsurface as a result of the dry cleaning operation is unlikely. Therefore, no further evaluation or sampling assessments are warranted.



