



March 2, 2023

Mr. Greg Gunderson
Gunderson Cleaners Inc.
41 Main Street
Menasha, WI 54952

Sent via electronic mail only to greg.gunderson@gundersongroup.com

SUBJECT: Response to Technical Assistance Request
Gunderson Cleaners Inc, 118 High Ave, Oshkosh, Wisconsin
BRRTS #: 02-71-467002, FID #: 471011970

Dear Mr. Gunderson,

On November 21, 2022, the Wisconsin Department of Natural Resources (DNR) received the *Environmental Monitoring and Assessment Status Report* (the Report), dated November 18, 2022, submitted on your behalf by Brian Kappen of EnviroForensics, for the Gunderson Cleaners Inc site (the Site) located at 118 High Ave, Oshkosh, Wisconsin. The Report was accompanied by the appropriate fee of \$700 for a technical assistance request, required under Wis. Admin Code § NR 749.04(1), for formal DNR review and response. Based on review of your submittal, DNR has determined that additional investigation and documentation is needed.

Brief Site Background

The Site operated as a laundry service since the 1920s, and dry cleaning operations were performed by Mr. Gary Gunderson from approximately the 1940s through the mid-1980s; both perchloroethylene (PCE) and Stoddard solvents were used for dry cleaning purposes. On June 24, 2003, DNR was notified of contamination that was discovered on the Site during a Phase II Environmental Site Assessment, and a responsible party letter was issued to Mr. Gary Gunderson on July 14, 2003. Since that time, site investigation and a remedial action, including multiple excavations, have occurred at the site.

Report Summary

Based on EnviroForensics' review of the cumulative investigation, remediation, and monitoring data, the following conclusions were stated in the Report:

1. The site investigation (SI) is complete.
2. The remedial excavation activities completed in 2012 removed the majority of the unsaturated source material.
3. The most likely exposure pathway is vapor intrusion which has been investigated and ruled out by sampling data.
4. Remedial action to treat contamination in the High Avenue right-of-way is not realistic from a logistical or cost-benefit perspective. The direct-contact exposure pathway is only possible if excavation occurs, which can be mitigated by institutional controls enacted as part of case closure.

Enviroforensics provided the following recommendations for a remedial action to address the residual groundwater contamination on the Site within the Report:

- Evaluate in-situ remedial technologies and develop a Remedial Action Design Report that details a proposed approach;
- Obtain concurrence/approval from project stakeholders;
- Design and implement the remedial action;

- Conduct limited monitoring to demonstrate effectiveness; and
- Request case closure.

DNR Response

DNR has reviewed the Report and Site file, and is providing the following response to Enviroforensics' conclusions listed above:

1. The site investigation is complete.

DNR Response:

DNR is unable to concur that the site investigation is complete at this time. To better determine completeness of the site investigation, and recommended next steps, DNR recommends that all historic and recent data be compiled into a report and submitted for DNR review to better evaluate the conceptual site model.

Based on DNR's review of the Site file, it does not appear that shallow soil sampling (i.e. direct contact within the 0-4' below ground surface interval) has been completed at the site, thus degree and extent of contamination in shallow soil has not been defined. If post-excavation and/or shallow soil sampling was previously completed, these results should be submitted to the DNR. Additional shallow soil sampling may be required if it was not previously performed, or if there are gaps in delineation.

Contamination in groundwater requires further horizontal and vertical delineation. Some significant areas of concern are that the degree and extent of contamination at PZ-117 has not been vertically delineated and that contamination at MW-116 and MW-110 have not been horizontally delineated. Further justification and/or evidence is needed to verify that the off-site groundwater contamination is not from Gunderson, but instead is related to the adjacent Gillen LLC site, BRRTS # 02-71-519535.

Further investigation is needed to determine if utility backfill is acting as a preferential pathway for contaminant migration. If unable to obtain soil and/or groundwater samples from within the utility backfill, DNR recommends performing soil gas sampling. DNR also requests that additional information be submitted regarding the historic sewer (e.g. depth, flow direction, construction, backfill, etc.) as it appears there was a significant sanitary sewer release prior to the sanitary main's reconstruction in 2001.

After completion of the site investigation, a comprehensive site investigation report (SIR) needs to be submitted, per Wis. Admin. Code § NR 716. The SIR should include historic, post-excavation (if collected), and recent data for the Site.

2. The remedial excavation activities completed in 2012 removed the majority of the unsaturated source material.

DNR Response:

DNR is unable to concur with this statement as final documentation of the excavations were never submitted. DNR requires submittal of final documentation within a Remedial Action Documentation Report (RADR) per Wis. Admin. Code § NR 724. At a minimum, the RADR should include:

- Post-excavation sampling results;
- Excavation depths and limits (figures and cross sections should be created to depict the excavation depths and limits, and locations of post-excavation samples); and
- Disposal records.

3. *The most likely exposure pathway is vapor intrusion which has been investigated and ruled out by sampling data.*

DNR Response:

Additional information is required prior to DNR's concurrence that no additional vapor investigation is warranted at this time.

DNR needs additional information on if operating vapor mitigation system(s) (VMS) are present, and in which building(s). If VMSs are present, information pertaining to the systems should be submitted to DNR, including date of install, type of system, if they are operational, and whether they were operating during the most recent vapor sampling events. Building information should also be provided, including building layout, basement construction, distance between vapor ports and exterior walls, and any other pertinent information regarding the buildings where vapor sampling was completed.

Additional vapor investigation may be required, depending on additional soil and groundwater sampling results, and additional vapor information.

4. *Remedial action to treat contamination in the High Avenue right-of-way is not realistic from a logistical or cost-benefit perspective. The direct-contact exposure pathway is only possible if excavation occurs, which can be mitigated by institutional controls enacted as part of case closure.*

DNR Response:

Additional investigation within the right-of-way (ROW) is needed prior to DNR providing concurrence that no remedial action is required within the High Ave ROW.

Be aware that during your investigation, you are required to comply with Wis. Admin. Code chs. NR 700-754 and all other applicable statutes and administrative rules, including those pertaining to solid and hazardous waste management and/or wastewater discharges. Wis. Admin. Code ch. NR 716 details specific requirements for site investigations and for interpretation and presentation of your findings.

Emerging Contaminants

A separate, standalone, emerging contaminants scoping statement was submitted to the DNR on November 18, 2022, which included an evaluation for whether 1,4-dioxane and per- and poly-fluorinated alkyl substances (PFAS) are contaminants of concern for the Site. DNR has reviewed the scoping statement and site file, and there is strong evidence that the release is related to used chlorinated solvents, which has been linked to PFAS contamination. DNR is requesting a groundwater sampling plan be submitted for PFAS sampling.

Schedule

In consideration of administrative code requirements, the DNR is requesting implementation of the following schedule:

- Per Wis. Admin. Code § NR 716.09(1), the DNR is requesting the submittal of a supplemental site investigation work plan within 60 days of the date of this letter, by **May 1, 2023**. The work plan must comply with Wis. Admin. Code § NR 716.09(2). A fee is recommended for DNR review and response.
- Per Wis. Admin. Code § NR 716.11(2g), the additional site investigation activities must begin within 90 days of the submittal of the work plan.
- Per Wis. Admin. Code § NR 716.14, all sampling results are required to be submitted within 10 days of receiving the laboratory data.

Mr. Greg Gunderson, Gunderson Cleaners, Inc.
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- Per Wis. Admin. Code § NR 716.15(1), a supplemental site investigation report shall be submitted within 60 days after completion of the field investigation. A fee is recommended for DNR review and response.
- NR 700 semi-annual progress reports are required until the case is closed.

Once the additional work has been completed and documented, your consultant should evaluate the appropriateness of case closure based on the results of this additional work. If additional remedial action is warranted, your consultant should submit a remedial actions option report (RAOR) within 60 days after the completion of the field investigation.

The site investigation is an iterative process. The results of the additional investigation should be evaluated to determine if additional investigation is needed to fully define the degree and extent of contamination in all affected media. At this time, DNR is unable to concur with the recommended next steps within the Report. Once the additional information and/or investigation requested above is completed and submitted to DNR, these recommendations may be re-evaluated.

The DNR appreciates your efforts to investigate and remediate the Site. If you have any questions or concerns, please feel free to contact me, the new DNR project manager for the Site, at 920-366-5685 or via email at josie.schultz@wisconsin.gov.

Sincerely,



Josie Schultz
Project Manager – Hydrogeologist
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

cc: Wayne Fassbender, EnviroForensics (wfassbender@enviroforensics.com)