Scoping Statement Regarding Emerging Contaminants

One Hour Martinizing, 36929 Plank Road, Oconomowoc, Wisconsin 53066 BRRTS #02-68-551911

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.

The Site was leased and operated as a plant-on-premises dry cleaning facility by OHM from 1962 to 2008, when the building was demolished for property redevelopment. Tetrachloroethene (PCE) was utilized as the solvent for the cleaning process. The location of the former dry cleaner building became part of the parking lot for a large commercial building that has operated as a grocery store since redevelopment was completed.

Conclusion

Since 1962, the Site was occupied by a dry cleaning business and a parking lot for a commercial building. There is no history of manufacturing, and no reason to suspect 1,4-dioxane would have been used, stored, or discarded at the site.

The dry cleaning industry has been identified as a potential contributor to PFAS contamination because of suspected PFAS accumulation in dry cleaning waste. Our research of waterproofing/

stain repellent products used at other dry cleaner sites indicates that many of the commonly used products didn't contain PFAS compounds. In the attached questionnaire, the responsible party indicated that no waterproofing or stain-repellent treatments were applied at the Site, and no related chemicals or products were stored at the Site. As such, there was no pathway for PFAS to enter the dry cleaning waste stream.

Considering the Site history and operations, the release of PFAS to the subsurface is extremely unlikely. Therefore, no further evaluation or sampling assessments are warranted.



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: OHM - Oconomowoc
BRRTS No. or FID: 02-68-551911
Address: 36929 Plank Rd, Oconomowoc, WI
Interviewer: B. Kappen
Site Representative/Title: Brian Cass
Current Use of the Site: Parking lot
Historical Site Use(s): Dry cleaning

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)
None		



Site Name:

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?

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

NIA

NA
c. Describe where and how the products were discarded.
NIA
3. For any of the products listed in Question #1, please provide any safety data sheets or other product documentation you may have.
4. Please state when you installed secondary containment for the transfer of sludge from the dry cleaning machine still. 1991
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. We always need a 2th purp waste harler. Reports and B manifests on his was DNR. Too many to well the
o. Describe the <u>location and purpose</u> of any condenser or dry cleaning vents to the outdoors.
nataowa
By signing below, you are certifying that this information is true and accurate to the best of your knowledge.
Signature Printed Name Date 10/14/21
Printed Name Date
Brian Gass 10/14/21

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