

Scoping Statement Regarding Emerging Contaminants

One Hour Martinizing, 6737 West Milwaukee Avenue, Wauwatosa, Wisconsin 53213
BRRTS #02-41-551923

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 operated as a gasoline service station from at least 1927 through the late 1970's or early 1980's. The Site was a vacant gasoline service station when it was purchased by One Hour Martinizing (OHM) in 1982. Dry cleaning operations occurred at the Site from 1982 through 2009, at which time OHM centralized active cleaning and the Site was only used as a customer service location for garments dry cleaned elsewhere. Tetrachloroethene (PCE) was utilized as the solvent for the cleaning process.

Conclusion

Since 1927, the Site operated as a gasoline service station and a dry cleaning business. 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 emerging contaminants are decidedly not associated with the petroleum fuel products that were historically used, handled, and stored 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-Wauwatosa

BRRTS No. or FID: 02-41-551923

Address: 6737 W Milwaukee Ave, Wauwatosa, WI

Interviewer: B. Kappen

Site Representative/Title: Brian Cass

Current Use of the Site: Customer service (garment drop-off location)

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)
<i>None</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?

N/A

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

N/A

- c. Describe where and how the products were discarded.

N/A

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.

1990

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 used a 3rd party.
Reports & manifests on file with DNR.

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

east side. cool the chiller

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

Signature



Printed Name

Brian Cass

Date

10/19/21