September 1, 2021

Attention: Jeff Ackerman
Wisconsin Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg, Wisconsin 53711-5397

Dear Mr. Ackerman,

Reference: Historical Site Operations and Emerging Contaminants Concern Summary Letter; Care'n Cleaners, 735 West Main Street, Waupun, Wisconsin WDNR BRRTS #02-14-552053; Stantec Project #: 193702865

This letter is intended to summarize an evaluation of the potential use of emerging contaminants including perfluoroalkyl and polyfluoroalkyl substances (PFAS) associated with historical operations related to the tetrachloroethene (PCE) release at the site located at 735 West Main Street, Waupun, Wisconsin (the Site), are presented herein. A Site location map is provided as Attachment B.1a. of this submittal. A Site Layout map illustrating the main features of the Site is provided as Attachment B.1.b.

To assist Care'n Cleaners with required obligations regarding the PCE release, Stantec has completed site investigation activities between 2008 and 2021. The objective of the site investigations was to delineate soil, groundwater, and vapor contamination associated with the identified release and to assist with Site closure.

Historical Site Operations and PFAS Use Evaluation

The Site has operated a dry cleaner business since the early 1970s and continues to do so. The primary solvent used by Care 'n Cleaners has been PCE. A 100-gallon above ground storage tank (AST) used to store PCE was formerly located adjacent to the northeast corner of the Site building. Since 1980, PCE has been stored in sealed storage containers located in the Site building. During 1998, a 2000-gallon underground storage tank (UST) was removed and a 4000-gallon UST was abandoned in place. The USTs reportedly stored gasoline. No other historical Site operations are reported to have taken place. Gasoline contaminated soil was not reported as being present during the UST closure. Site investigation activities to date have identified chlorinated volatile organic compound (CVOC) contaminated soil, groundwater, and vapor at the Site nearby the Site building which is likely attributed to the historical dry-cleaning operations which included the use and storage of PCE solvents at the Site.

PFAS related concerns associated with historical operations at the Site are based upon guidance provided by the WDNR in the RR-01 publication (WDNR, 2019) and also guidance provided by the Interstate Technology Regulatory Council (ITRC) in their report entitled "Per- and Polyfluoroalkyl Substances (PFAS)" (ITRC, 2020). PFAS contamination is not likely to be associated with the storage of leaded gasoline USTs. In addition, PFAS is not likely to be associated with historical dry-cleaning operations. Therefore, the use, storage, and/or presence of PFAS is not likely at the Site.

In summary, since there is no direct evidence of the use or presence of PFAS at the Site, and UST storage operations and dry-cleaning operations are not commonly associated with PFAS, further investigation of the presence of PFAS does not appear warranted. Stantec requests a written response from the WDNR which concurs with these findings.

Regards,

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REFERENCES

ITRC, 2020 (September), “Per- and Polyfluoroalkyl Substances (PFAS).”

WDNR, 2019 (September), “Site Investigation Scoping: Identifying Contaminants of Concern, Wis. Admin. Code § NR 716.07.”