



January 5, 2024

Mr. Dan Martino
7513 41st Avenue
Kenosha WI 53142
Via Email Only to danmartinosr@aol.com

Subject: Technical Assistance Response
Martinos Master Drycleaners, 7513 41st Avenue, Kenosha, WI 53142
BRRTS #02-30-552188, FID #230067090

Dear Mr. Martino:

On November 9, 2023, the Wisconsin Department of Natural Resources (DNR) received the *Groundwater Monitoring and Emerging Contaminant Assessment* (the Report), dated October 24, 2023, prepared by EnviroForensics, LLC (EnviroForensics) on your behalf for the site identified above. The Report was submitted with a technical assistance request fee for DNR review and written response, in accordance with Wis. Admin. Code § NR 749.04 (1). The DNR reviewed the Report for compliance with Wisconsin Statutes (Wis. Stats.) ch. 292 and Wisconsin Administrative (Wis. Admin.) Code chs. NR 700-754, and provides the feedback below.

Report Review

The Report presents perfluoroalkyl and polyfluoroalkyl substances (PFAS) and chlorinated volatile organic compound (CVOC) groundwater data collected in August 2023 from the monitoring well network for the subject site. The below conclusions are made by EnviroForensics in the Report:

- The source of PFAS in groundwater is unclear and additional PFAS groundwater sampling is not warranted due to the low concentrations identified.
- The soil vapor extraction system that operated at the site has removed much of the contaminant mass that formerly supplied the downgradient groundwater contamination plume.
- The presence of comingled petroleum groundwater contamination plume from an off-site source promotes reductive dechlorination within the CVOC contamination plume. Tetrachloroethene (PCE) and trichloroethene (TCE) are absent in the downgradient monitoring well MW-12.
- The footprint of the residual groundwater contamination plume has not changed over 9 years of monitoring downgradient wells.

The Report requests DNR concurrence that the site is ready for Wis. Admin. Code ch. NR 726 case closure. The DNR provides the following comments in response to the Report:

1. Based on the information received by the DNR to-date, no additional soil investigation is required at this time.
2. Collect additional monitored natural attenuation (MNA) parameters and CVOC data from monitoring well locations MW-1, MW-3, MW-6, MW-5, MW-10, MW-11, and MW-12 to support the use of natural

attenuation as a remedy for groundwater contamination to satisfy case closure requirements in Wis. Admin. Code § 726.05(6)(b). In addition to the MNA parameters that have been measured in the past groundwater monitoring events, as outlined in the *Remediation Site Operation, Maintenance, Monitoring and Optimization Report* submitted to the DNR on January 21, 2022, magnesium, iron, and hydrogen sulfide should be measured.

3. Future groundwater monitoring reports should include the following documentation:
 - a. Separate groundwater contour maps showing the primary contaminants of concern and their breakdown products.
 - b. Graphical displays of the VOC data.
 - c. Table(s) showing the MNA data alongside the CVOC data.
 - d. Comprehensive data tables showing all CVOC and MNA data collected to-date.
 - e. Discussion of the MNA data and whether it indicates natural attenuation is occurring.
4. PCE has been identified greater than its Wis. Admin. Code ch. NR 140 preventive action limit (PAL) and/or enforcement standard at source well MW-1 since 2018. PCE was not detected at MW-1 during groundwater sampling that occurred from 2011 - 2016. In your next submittal for this site, discuss this increasing trend of the parent product PCE at MW-1. Specifically indicate whether this is representative of a new hazardous substance discharge event.
5. One round of groundwater sampling for PFAS has occurred at MW-3, MW-8, and MW-12 in August 2023. Perfluorooctanoic acid (PFOA) was detected greater than its proposed preventive action limit (PAL). The Report indicates that, since PFAS were detected at the upgradient monitoring well location MW-8, the source of the PFAS groundwater contamination is unclear. However, based on the information presented to the DNR to-date, the PFAS groundwater contamination identified must be investigated as a part of the Wis. Admin. Code NR 700 process for the subject site. Collect an additional round of PFAS sampling to demonstrate that the PFAS groundwater contamination plume is stable or receding, per Wis. Admin. Code § NR 726.05(6)(c).
6. Based on the information received by the DNR to-date, no additional vapor investigation is required at this time.
7. The Report was not presented with Wis. Admin. Code ch. NR 712 certification(s) and signature(s). Provide this required documentation in future reports, as may be appropriate.

Next Steps

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

- Per Wis. Admin. Code § NR 716.14, submit all sampling results within 10 business days of receiving laboratory data.
- Per Wis. Admin. Code § NR 724.17, submit a long-term monitoring plan (LTMP) in response to items 2 and 3 above. The DNR will review the LTMP under the technical assistance review fee submitted with the Report, if it is submitted within a reasonable time, before March 5, 2024. The LTMP should include a contingency plan, if the use of natural attenuation is not a feasible remedial action for the residual groundwater contamination.

The DNR appreciates the actions you are taking to restore the environment at this site. If you have any questions regarding this site or this letter, please contact me, the DNR Project Manager, at (414) 435-8021 or jane.pfeiffer@wisconsin.gov.

Sincerely,

A handwritten signature in cursive script that reads "Jane Pfeiffer".

Jane K. Pfeiffer
Project Manager – Hydrogeologist
Remediation & Redevelopment Program

cc: Mr. Brad Lewis, EnviroForensics, LLC, blewis@enviroforensics.com
Mr. Wayne Fassbender, EnviroForensics, LLC, wfassbender@enviroforensics.com