



May 15, 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*, 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). On January 5, 2024, DNR provided a technical assistance letter in response to the November 9, 2023, report. On March 18, 2024, EnviroForensics submitted *Technical Response to the January 5, 2024 WDNR Letter* (the Report) on your behalf as a part of documentation for the November 9, 2023 technical assistance fee. 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 comments on the Report in this letter.

Report Review

The Report presents arguments for why EnviroForensics opines that monitored natural attenuation (MNA) has already been demonstrated for the site's chlorinated volatile organic compound (CVOC) groundwater plume. The Report also reiterates that EnviroForensics does not believe that the perfluoroalkyl and polyfluoroalkyl substances (PFAS) contamination in groundwater is from the source of contamination for the subject site.

The DNR provides the following comments in response to the Report:

1. The extent of the CVOC groundwater plume appears to be delineated laterally and vertically. However, CVOC concentrations and the MNA parameters within the source area of the plume present inconsistent trends. For example, the parent source product, tetrachloroethene (PCE), shows increasing trends at MW-1 and the concentrations of contaminants remain significantly greater than the Wis. Admin. Code ch. NR 140 enforcement standards. Continue to collect MNA parameters and CVOC data from monitoring well locations MW-1, MW-3, and MW-6 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). Magnesium, iron, and hydrogen sulfide should be measured 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.
 - a. The Report indicates that the increasing trend of PCE in groundwater at MW-1 is likely attributable to the slight changes to the subsurface environment and the discontinuation of the on-site soil vapor extraction (SVE) system. The SVE system was shut down in 2021, which was after the rise in PCE was originally observed at MW-1 between approximately 2018-2020. Further, based on the groundwater elevations documented in the November 9, 2024, *Groundwater*

- Monitoring and Emerging Contaminant Assessment* report, it does not appear that groundwater elevations have fluctuated significantly at MW-1. The information provided by EnviroForensics via email on April 29, 2024, indicates that the PCE dry-cleaning machine was removed from the site in approximately 2020. Discuss whether this may have influenced PCE concentrations in groundwater at MW-1. Generally, provide additional discussion of this increasing trend at MW-1 following the additional MNA and CVOC groundwater monitoring events.
2. Future groundwater monitoring reports should include the following documentation and discussion, in addition to the documentation listed in the DNR's January 5, 2024, letter:
 - a. Figures displaying the relationship between the CVOC groundwater plumes and time (i.e., isoconcentration maps throughout different sampling periods).
 - b. Interpretation and justification for MNA and plume stability, using the additional data collected in response to this letter.
 3. To confirm the results identified during the first round of PFAS groundwater sampling, perform an additional round of PFAS sampling at MW-3, MW-8, and MW-12, per Wis. Admin. Code § NR 726.05(6)(c).
 4. Per Wis. Admin. Code §§ NR 716.07 and 716.09, in your next submittal, provide an evaluation of potential PFAS compounds and other applicable emerging contaminants that were historically or are presently produced, used, handled, or stored at the site. The evaluation should include any available information on whether any products containing PFAS were used in any process services, the duration of PFAS-containing product use, the type of PFAS contained in the product, and any areas of the site where PFAS-containing products may have been used, stored, managed, or discarded.
 5. Continue to present the applicable Wis. Admin. Code ch. NR 712 certification(s) and signature(s) with future reports.

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.
- The DNR requests that the information requested in this letter be submitted to the DNR as a site status update. The DNR recommends that a technical assistance fee for DNR review and written response be submitted with this forthcoming report. The DNR will review this forthcoming report to determine whether a long-term monitoring plan will be required, per Wis. Admin. Code § NR 724.17.

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,



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

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