



October 30, 2019

Mr. Jim Mohr
Tidy, Inc.
818 S. Broadway Ave
Green Bay, WI 54304

Subject: PFAS Sampling Requirements
Tidy Cleaners & Laundry, 818 S. Broadway Avenue, Green Bay, WI 54304
BRRTS #: 02-05-552220

Dear Mr. Mohr:

The Wisconsin Department of Natural Resources (DNR) has identified the Tidy Cleaners & Laundry site as a potential source for per- and polyfluoroalkyl substances (PFAS). DNR believes this emerging contaminant may be present in soil and groundwater on your property identified above. The DNR has regulatory authority to ask responsible parties to evaluate hazardous substance discharges and environmental pollution including emerging contaminants:

- Wis. Stat. § 292.01 (3) "Discharge" means, but is not limited to, spilling, leaking, pumping, pouring, emitting, emptying or dumping.
- Wis. Stat. § 292.01 (4) "Environmental pollution" means contaminating ... air, land, or waters of the state or making the same injurious to public health ...
- Wis. Stat. § 292.01 (5) "Hazardous substance" means any substance ... which may pose a substantial present or potential hazard to human health or the environment because of its quantity, concentration or physical, chemical or infectious characteristics ...

Background

This site has been occupied by a dry-cleaning and fabricare facility since the 1960s. An open contamination case with the DNR's Remediation and Redevelopment Program titled Tidy Cleaners & Laundry is tracked as BRRTS # 02-05-552220. Soil and groundwater contamination resulted from a hazardous substance discharge of chlorinated volatile organic compounds (CVOCs). The use of PFAS has been associated with dry-cleaning and fabricare operations both nationally and in Wisconsin; this site may be a source of PFAS contamination.

Site Investigation

Information previously provided for this facility indicates a discharge of hazardous substances from dry-cleaning and fabricare activities. As stated above, dry-cleaning and fabricare operations have been historically linked to PFAS use and/or manufacture. Site investigation scoping (Wis. Admin. Code § NR 716.07) and the site investigation work plan (Wis. Admin. Code § NR 716.09) require an evaluation of the history of the facility, previous discharges, and uses on the site that may be associated with discharges of hazardous substances.

The DNR has the authority under the Wis. Admin. Code NR 700 series to require the evaluation of PFAS at this site. According to Wis. Admin. Code § NR 716.09, the DNR requires that you submit a site investigation work

plan that includes an assessment of PFAS, and per Wis. Admin. Code § NR 716.07 (4), all environmental media affected or potentially affected by the contamination must be evaluated.

As stipulated in Wis. Admin. Code § NR 716.07 and Wis. Admin. Code § NR 716.09, the work plan should include a written evaluation of potential PFAS compounds 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 utilized in any process services, the duration of PFAS use, the type of PFAS utilized, and any areas of the site where PFAS may have been used, stored, or discarded. The site investigation work plan must include a groundwater sampling program for evaluating PFAS compounds at the site.

Schedule

The DNR is requesting that you submit a site investigation work plan for PFAS by January 3, 2020.

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding anything outlined in this letter, or would like to arrange a meeting, please contact me, the DNR Project Manager, at 920-662-5424, or at Josie.Schultz@wisconsin.gov.

Sincerely,



Josie Schultz
Hydrogeologist
Remediation & Redevelopment Program

cc: Matt Dahlem, Fehr Graham (mdahlem@fehr-graham.com)
Dillon Plamann, Fehr Graham (dplamann@fehr-graham.com)

Schultz, Josie M - DNR

From: Dillon Plamann <DPlamann@fehr-graham.com>
Sent: Tuesday, November 5, 2019 4:23 PM
To: Schultz, Josie M - DNR
Cc: Matt Dahlem
Subject: RE: Tidy Cleaners & Laundry 02-05-552220, Request for PFAS sampling

Thank you Josie for the clarification.

These costs were only related to PFAS investigation, so please cancel the change order I sent you earlier. I have made our client aware of this as well.

Thanks!

DILLON PLAMANN | Project Hydrogeologist
Fehr Graham | Engineering & Environmental

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From: Schultz, Josie M - DNR <josie.schultz@wisconsin.gov>
Sent: Tuesday, November 05, 2019 4:20 PM
To: Dillon Plamann <DPlamann@fehr-graham.com>
Cc: Matt Dahlem <mdahlem@fehr-graham.com>
Subject: RE: Tidy Cleaners & Laundry 02-05-552220, Request for PFAS sampling

Hi Dillon,

To follow up to our phone conversation a little while ago, PFAS investigation and remediation will not be eligible expenses under DERP.

PFAS sampling costs will need to be separated out from DERF claims and change orders. If PFAS sampling will be performed at the same time as other DERF eligible activities (e.g. groundwater sampling, vapor sampling...), consulting costs will need to be divided amongst the different actions. This is similar to what is required for PECFA sites that also involve ERP activities that aren't PECFA eligible. PFAS-related activities don't require separate submittals, just the costs will need to be separated.

I hope this helps clarify, as I'm unsure if this SIWP is for PFAS sampling only, or if it also includes DERF-eligible sampling as well. Please don't hesitate to call if you have any questions.

Sincerely,
Josie

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Josie M. Schultz

Hydrogeologist – Northeast Region Remediation and Redevelopment Team
Wisconsin Department of Natural Resources
2984 Shawano Avenue, Green Bay, WI 54313-6727
Phone: 920-662-5424
Cell: 920-366-5685
Josie.Schultz@Wisconsin.gov



From: Dillon Plamann <DPlamann@fehr-graham.com>
Sent: Tuesday, November 5, 2019 2:23 PM
To: Schultz, Josie M - DNR <josie.schultz@wisconsin.gov>
Cc: Matt Dahlem <mdahlem@fehr-graham.com>
Subject: RE: Tidy Cleaners & Laundry 02-05-552220, Request for PFAS sampling

Good afternoon Josie,

Attached is a change order request to create a PFAS Sampling Work Plan for the Tidy Cleaners & Laundry site, BRRTS # 02-05-552220, as required by the letter you sent out last week.

Attached is Change Order #4 that has been approved by Tidy Cleaners. Please sign and return if you approve of these additional funds. If you have any questions please let me know.

Thank you!

DILLON PLAMANN | Project Hydrogeologist
Fehr Graham | Engineering & Environmental

909 North 8th Street, Suite 101
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From: Schultz, Josie M - DNR <josie.schultz@wisconsin.gov>
Sent: Wednesday, October 30, 2019 9:39 AM
To: 'Jim Mohr' <jmohr5@new.rr.com>
Cc: Matt Dahlem <mdahlem@fehr-graham.com>; Dillon Plamann <DPlamann@fehr-graham.com>
Subject: Tidy Cleaners & Laundry 02-05-552220, Request for PFAS sampling

Good Morning Mr. Mohr,

Attached to this email is a request for PFAS sampling in groundwater for the Tidy Cleaners & Laundry site, BRRTS # 02-05-552220. The DNR is requesting a site investigation workplan for PFAS sampling be submitted to the DNR by January 3, 2020.

Please review this letter and feel free to contact me with any questions you may have.

Sincerely,
Josie Schultz

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Josie M. Schultz

Hydrogeologist – Northeast Region Remediation and Redevelopment Team

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