



January 23, 2020

Mr. Ronald Collison
2140 North 93rd Street
Wauwatosa, WI 53226

Paulette Enders
City of Wauwatosa
7725 West North Avenue
Wauwatosa, WI 53213

Subject: PFAS Sampling Requirements
Vogue Cleaners, 2578 North Wauwatosa Avenue, Wauwatosa, WI
BRRTS #: 02-41-562047; FID #: 241920690

Dear Mr. Collison and Ms. Enders:

The Wisconsin Department of Natural Resources (DNR) has identified the Vogue Cleaners site as a potential source for per- and polyfluoroalkyl substances (PFAS). The 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 is a former dry-cleaner facility that operated from the 1960s to the 2000s. An open contamination case with the DNR's Remediation and Redevelopment Program titled Vogue Cleaners is tracked as BRRTS # 02-41-562047. 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. 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 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 March 23, 2020.

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding anything outlined in this letter, please contact me, the DNR Project Manager, at 414-263-8626, or at Alice.Egan@wisconsin.gov.

Sincerely,



Alice Egan
Hydrogeologist
Remediation & Redevelopment Program

cc: Rob Hoverman, Enviroforensics, N16 W23390 Stone Ridge Drive, Suite G, Waukesha, WI (electronic)
Ted Warpinski, 330 East Kilbourn Avenue, Suite 1250, Milwaukee, WI (electronic)