



**Sent Electronically to Caroline.Rice@wisconsin.gov and
the WDNR Document Submittal Portal**

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**EMERGING CONTAMINANTS LETTER
TRACE-MITCHELL REAL ESTATE LLC
RETAIL WHOLESALE STORE
1305 N. JOHNS STREET
DODGEVILLE, IOWA COUNTY, WI 53533
BRRTS 02-25-587099**

August 16, 2022

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Dear Ms. Rice:

The purpose of this letter is to address potential "emerging contaminants" (per- and polyfluoroalkyl substances [PFAS] and 1,4-dioxane) pertaining to the above-referenced property ("site"). The site has been used for retail operations since it was first developed in 1982. This letter accompanies Ramboll's August 15, 2022, NR 716 *Site Investigation Report*, which concludes that no significant releases have occurred on the site.

Ref. 1690020998

Historical Land Use

The site is comprised of two parcels (216-1313 [0.37 acre] and 216-1312 [0.40 acre]) located on the northeast corner of North Johns Street and Brown Street. The two parcels total 0.77 acre of land. A 5,000 square-foot, single-story building is present on Parcel 216-1313 that was constructed in 1982 with a storage shed located at the northeast corner of the building. A dry-cleaner operated at the site from approximately 1982 to 2003. Reportedly, one self-contained/closed-loop dry-cleaning machine was present in the northwestern portion of the building. The building is currently occupied by NAPA Auto Parts, which is a retail store for automotive supplies (parts, tools, paint, etc.). As part of the retail operations, small volumes of paint are colored and then mixed for sale to customers. In addition, small volumes of certain solvents are sold in retail containers at the store. No solvent mixing is conducted and the only wastes

generated at the facility include domestic waste and used batteries (which are stored in the backroom until picked up for recycling).

The eastern portion of the site is vacant and landscaped with grass and only contains a portion of the storage shed. According to a June 2020 Phase I Environmental Site Assessment (ESA), the eastern parcel has always been undeveloped.

Emerging Contaminants Evaluation

Ramboll evaluated the potential release of PFAS that are associated with stain prevention products used on fabrics or clothing that was dry-cleaned. PFAS could be present in the spent dry-cleaning fluid (tetrachloroethene [PCE]). However, as discussed in the site investigation report, there is no evidence of a release of PCE, nor any of its degradation products in any of the 15 soil samples collected at the site. Therefore, PFAS should not be considered a contaminant of concern related to the historical dry-cleaning operations at the site.

PFAS has been used in paints and coatings since at least 1980, and fluorinated surfactants for oil- and water-repellent coatings and paints have been used since at least 1993 (Glüge et al. 2020). However, paints were not manufactured at the site and only small quantities of paint (1 quart and 1 gallon) are mixed and sold. Significant paint stains were not observed on the floor slab or outside of the building and the concrete floor in the building was in good condition during Ramboll's March 2022 site visit. Therefore, the use of PFAS-associated with paint products should not be considered a contaminant of concern at the site.

Emerging contaminants such as 1,4-dioxane are used primarily as a stabilizer in solvents like 1,1,1-trichloroethane and trichloroethene, and as a solvent in lacquers, paints, and resins. However, 1,4-dioxane is not considered a contaminant of concern at the site, based on 1) the NAPA operations did not utilize a degreasing station, 2) there were no chlorinated volatile organic compounds detected in any of the 15 soil samples collected at the site, 3) the concrete floor in the building did not have any evidence spills, and 4) the floor slab also was in good condition.

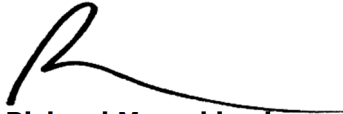
Conclusions

Following WDNR Guidance RR-101, the historical dry-cleaning and retail paint operations were evaluated for potential "emerging contaminants" (PFAS and or 1,4-dioxane) of concern. However, Ramboll has ruled out these substances as explained above.

Closing

As Ramboll has completed and submitted (August 15, 2022) the NR 716 revised site investigation report to the WDNR, this letter supplements the report regarding emerging contaminants (PFAS and or 1,4-dioxane). Ramboll does not intend to include any sampling for emerging contaminants based on historic site use, soil sampling evidence, and the site condition. Please feel free to reach out to us with questions.

Sincerely yours,

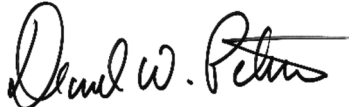


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References

AEI Consultants, Inc. 2020. Phase I Environmental Site Assessment. June 19.

Glüge, Juliane, et al. *An overview of the uses of per-and polyfluoroalkyl substances (PFAS)*. *Environmental Science: Processes & Impacts* 22.12 (2020): 2345-2373.