



November 25, 2019

Randy Turtenwald
City Engineer
400 La Crosse Street
La Crosse, WI 54601

Subject: Review of Site Investigation Work Plan
La Crosse Municipal Wells 23 & 24
Fisherman Rd, French Island, La Crosse, WI
BRRTS #: 02-32-000065

Dear Mr. Turtenwald:

On November 6, 2019, the Wisconsin Department of Natural Resources (DNR) received the Site Investigation Work Plan (SIWP) prepared for the City of La Crosse by the OS Group. The Report was submitted with a fee for DNR review and response. The submittal of a SIWP is required per Wis. Admin. Code § NR 716.09. The DNR reviewed the Report for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have not been substantially met. Exceptions and additional comments are provided in this response letter.

Background

La Crosse municipal wells 23 and 24 were the subject of a formerly closed investigation into trichloroethylene (TCE) impacts to the municipal wells. The source of TCE impacts was determined to be two former fire training burn pits located on the La Crosse municipal airport property. Site investigation and remedial action was conducted, and the site was closed in 2010 with no remaining TCE impacts above enforcement standards.

In 2014, Unregulated Contaminant Monitoring Rule (UCMR) sampling identified per- and polyfluoroalkyl substance (PFAS) compounds in municipal well 23. PFAS compounds are commonly associated with aqueous film forming foam (AFFF), otherwise known as firefighting foam, that is typically associated with fire training and suppression activities. Based on recent PFAS impacts to municipal well 23, the proximity of the fire training pits, and information on the previous site investigation, the site was reopened in May 2019 for further investigation into PFAS detects in municipal well 23.

SIWP Summary

To delineate the environmental impacts of the reported discharge, the SIWP recommended completion of the following activities:

- 1) Groundwater: Installation of four (4) water table monitoring wells and three (3) piezometers in the suspected source area and downgradient. Monitoring wells and piezometers will be sampled once and the need for additional sampling and/or additional monitoring points will be evaluated.
- 2) Soil: Installation of six (6) soil borings in the suspected source area with three (3) samples to be submitted from each boring for laboratory analysis.

- 3) **Surface Water:** Two (2) surface water samples are proposed to be collected from the Black River. One (1) suspected background sample will be collected upstream of the suspected point of entry of the PFAS plume, and one (1) downstream.

Status updates will be provided to the DNR after each phase of investigation, and a comprehensive site investigation report will be provided upon completion of the site investigation in accordance with Wis. Admin. Code § NR 716.15.

DNR Review of the SIWP

The DNR concurs with the site investigation activities that are proposed to address soil, groundwater and surface water related to the suspected release from the fire training burn pit area. However, in order to ensure that the *“scope and detail of the field investigation are appropriate to the complexity of the site or facility”* as required in Wis. Admin. Code § NR 716.07, the sediment and drinking water media must also be assessed in the SIWP, and other potential sources of PFAS at the airport facility must be evaluated. The DNR requests that you revise this submittal to meet the following regulatory requirements:

- 1) **Evaluation of Environmental Media:** Wis. Admin. Code § NR 716.07(4) requires evaluation of all *“Environmental media affected or potentially affected by the contamination.”* To evaluate all media potentially affected, the DNR requests that you incorporate the following items into the SIWP:
 - a. **Surface Water:** In addition to the upstream and downstream surface water samples, include surface water sampling in the location of suspected entry of the plume into the Black River.
 - b. **Sediment:** Include sampling of the sediment below each location proposed for surface water sampling. One (1) sediment sample should also be collected from the point of discharge location applicable to the pump test of municipal well 23 and WPDES Permit # 0057671-04.
 - c. **Drinking Water:** Include sampling of municipal wells 23 and 24 as part of the groundwater monitoring schedule.
- 2) **History of Hazardous Substance Discharges:** Wis. Admin. Code § NR 716.07(3) requires an evaluation of the *“History of previous hazardous substance discharges or environmental pollution.”* The SIWP discusses the use of firefighting foam at the training burn pits until approximately 1988. It goes on to indicate that Class B foam is still in use at the facility, although it is not used for training purposes. To more thoroughly assess use of firefighting foam at this facility, incorporate an evaluation of the following into the SIWP:
 - a. Locations where firefighting equipment is tested or maintained at this facility.
 - b. Locations of recent or historic fires at this facility where foam may have been used.
- 3) **Impacts to receptors:** Wis. Admin. Code § NR 716.07(7) requires an evaluation of *“Potential or known impacts to receptors, including public and private water supplies... within a 1200- foot radius of the outermost edge of contamination.”* The WDNR Water Withdrawal Location Viewer indicates numerous groundwater withdrawal locations, including private wells, that could potentially require assessment based on the location of known impacts and potential discharges from other locations discussed above. The DNR requests that you conduct an evaluation of all water withdrawal locations within 1200 feet of a known or potential impact and make a determination as to whether assessment is necessary.

4) **Schedule:** The SIWP does not include a schedule for conducting the field investigation and reporting the results, per Wis. Admin. Code § NR 716.09(2)(h). Furthermore, the DNR is requesting implementation of the following schedule:

- A revised site investigation work plan must be submitted by January 25, 2020, to address the comments identified above. The work plan must comply with all the requirements identified in Wis. Admin. Code § NR 716.09(2).
- Results of the site investigation activities must be submitted to the DNR in a comprehensive Site Investigation Report (SIR) that meets the requirements in Wis. Admin. Code § NR 716.15. The SIR shall be submitted to the DNR within 60 days after completion of the field investigation and receipt of laboratory data. The DNR recommends that the SIR be submitted with a fee for review and response.
- NR 700 semi-annual progress reports will be required until the case is closed.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me at 715-839-3710 or David.Rozeboom@wisconsin.gov.

Sincerely,



Dave Rozeboom
West Central Region Team Supervisor
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

cc: John Storlie, OS Group