State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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Tony Evers, Governor
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May 19, 2025

Mr. Chad Abram
214 East Blackhawk Avenue
PO Box 324
Prairie Du Chien, WI 53821
Via Email Only to cabram@prairieduchien-wi.gov

Subject: Site Investigation Work Plan Review
Blackhawk Drycleaners, 700 East Blackhawk Avenue, Suite 4, Prairie Du Chien, WI
BRRTS #02-12-552357, FID #612034170

Dear Mr. Abram:

On March 31, 2025, the Wisconsin Department of Natural Resources (DNR) received the *Proposed Additional PFAS Investigation* (the "Report") prepared by SCS Engineers on your behalf for the above-referenced site. The DNR reviewed the Report for regulatory compliance with Wisconsin Administrative (Wis. Admin.) Code ch. NR 716, and has determined that the work plan cannot be approved at this time and requests that an updated work plan be presented to incorporate the feedback provided in this letter.

Report Review
The Report proposes to install three Wis. Admin. Code ch. NR 141 compliant groundwater monitoring wells (MW- 15, MW-16, and MW-17) downgradient of the identified per- and polyfluoroalkyl substances (PFAS) groundwater contamination. These wells will be sampled, and lab analyzed for PFAS.

The DNR requests that an updated site investigation work plan be submitted that incorporates the following comments:

1. In addition to MW-15, MW-16, and MW-17, perform additional groundwater monitoring for PFAS at all existing monitoring wells on-site to help demonstrate that the identified groundwater contamination plume is stable or receding, in accordance with Wis. Admin. Code § NR 726.05(6)(c).
    a. On January 15, 2025, the DNR requested in an email (attached) that you assess the hydraulic connection between PFAS in the site's source area and the PFAS detected in municipal well BF420, which is to the east of the site. Provide this assessment after the next groundwater data submittal.
2. Tetrachloroethylene (PCE) greater than its applicable Wis. Admin. Code ch. NR 140 preventive action limit (PAL) was observed at MW-5, which is the furthest downgradient monitoring well that was sampled and analyzed for chlorinated volatile organic compounds (CVOCs). To help define the degree and extent of CVOCs in groundwater, groundwater at MW-10 should sampled lab analyzed for CVOCs, per Wis. Admin. Code § NR 716.01.
3. To help demonstrate that CVOCs in groundwater are stable or receding, collect and analyze groundwater samples for CVOCs at MW-1 through MW-8, per Wis. Admin. Code § NR 726.05(6)(c).
4. Following the completion of the site investigation and as you may prepare for future redevelopment, the next phase within the NR 700 process will be to establish a remedial action strategy for the site contamination. This will include evaluating remedial action options and developing a remedial strategy to

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present in a remedial action options report, as required under Wis. Admin. Code ch. NR 722. Some of these potential remedial options may include, but are not limited to, hot spot soil excavation and/or monitored natural attenuation. As groundwater monitoring is underway, you might consider performing monitored natural attenuation (MNA). MNA could be useful at this site to help satisfy closure requirements outlined in Wis. Admin. Code § NR 726.05(6)(b), which may be applicable depending on the results of the forthcoming groundwater sampling event(s). For further information on MNA, you may reference DNR's guidance document RR-699, *Understanding Chlorinated Hydrocarbon Behavior In Groundwater: Investigation Assessment And Limitations Of Monitored Natural Attenuation*. Additionally, given that sub-slab vapor has been identified in exceedance of its vapor risk screening level (VRSL), a remedial action to reduce the mass and concentration of contamination to the extent practicable is required prior to closure, per Wis. Admin. Code § NR 726.05(8)(b)(1). Considering these strategies as early as possible is useful to ensure the NR 700 requirements are incorporated into your ongoing work and overall goals for the site. Ultimately, the DNR looks to you and your environmental consultant to develop and propose a remedial action plan for the site.

Next Steps

The DNR requests that a revised work plan be submitted to address the above comments within 60 days of the date of this letter, by July 18, 2025, in accordance with Wis. Admin. Code § NR 716.09. If you have any questions concerning this site or this letter, please contact me, the DNR Project Manager, at (414) 435-8021, or by email at jane.gray@wisconsin.gov.

Sincerely,

Jane K. Gray
Hydrogeologist Program Coordinator
Remediation & Redevelopment Program
West Central Region

Attachments:
DNR Email, dated January 15, 2025

cc: Robert Langdon , SCS Engineers, rlangdon@scsengineers.com

Vitale, Matthew J - DNR

From: Vitale, Matthew J - DNR
Sent: Wednesday, January 15, 2025 11:50 AM
To: Langdon, Robert
Subject: Meeting Follow-up, Blackhawk Cleaners, BRRTS # 02-12-552357

Rob,

Thank you for joining the call last Friday to discuss Blackhawk Cleaners site with the City and WEDC. To summarize, the next steps in the site investigation are:

1. Continue downgradient investigation into extent of PFAS contamination with additional monitoring wells and/or provide evidence of sidegradient sources that may be contributing to the downgradient PFAS plume.
2. *(This was not discussed during the meeting)* Assess hydraulic connection between PFAS in the source are and PFAS detected in municipal well BF420 (east of the site). The GW flow map from May 2022 showed a reversed flow direction towards the municipal well. The July 2024 sample results from the well had a concentration of PFOA+PFOS at 11.26 ppt. The well is cased to 89 feet and screened to 138.5 feet.
   BF420 Sample Results
   BF420 Well Construction Report

In regards to the offsite VMS system:
- Per Wis. Admin. Code § NR 724.15, submit a construction documentation or as-built report (i.e., interim action report). Include all system commissioning data (e.g., indoor air data and pressure field extension measurements) within the report.
  - The DNR strongly recommends that a visual/audible alarm is included with the system to notify the off-site property owners of system failures.
- As a part of the interim action report, submit an operating, maintenance, and monitoring (OM&M) plan for all VMS components that includes the information specified in Wis. Admin. Code § NR 724.13(2), as applicable. The OM&M plan should be submitted as part of the interim action report.
  - Include an inspection and reporting schedule within the OM&M plan. Inspections of the VMS are to be completed annually, ideally by Sept 30 and submitted to DNR by Oct 15.
- You may reference the following DNR guidance documents as you work to generate the requested documentation:
  - https://widnr.widen.net/s/mldn2pxmxj
  - https://apps.dnr.wi.gov/doclink/forms/4400-321.pdf
- Once the above information is received, the DNR will work to apply continuing obligations for the operation and maintenance of the vapor mitigation system as an interim action at this off-site property. Because the city is enrolled in the VPLE program for the site, the DNR will assign the responsibility for OM&M of the system to the affected property owner when we apply the interim action COs.
- The above-requested documentation must be submitted with a $350 database fee for the application these continuing obligations.

Please contact me with any questions.

Matthew Vitale
Pronouns: He/Him/His
Hydrogeologist - Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
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Eau Claire, WI 54701
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Please visit our survey to provide feedback on your experience interacting with any DNR employee.