



March 10, 2020

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 January 25, 2020, the Wisconsin Department of Natural Resources (DNR) received the revised 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 been met.

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.

The revised SIWP identified five (5) additional potential source areas for PFAS contamination. A summary of proposed site investigation activities is outlined below.

SIWP Summary

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

Test Burn Pits

- 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.
- 4) Sediment: Five (5) sediment samples are proposed to be collected from upstream, downstream and point of discharge locations.

1997 Fuel Spill Area

Five (5) borings will be installed. Six (6) soil samples will be collected, and one (1) boring will be completed as a monitoring well.

AFFF Test Area

Six (6) borings will be installed. Ten (10) soil samples will be collected, and two (2) borings will be completed as monitoring wells.

Former Airport Fire Station

One (1) soil boring will be installed. Three (3) soil samples will be collected, and the boring will be completed as a monitoring well.

2001 Crash Site

Nine (9) boreholes will be installed. 15 soil samples will be collected, and one boring will be completed at a monitoring well.

Former Remediation Discharge Rip Rap

One soil sample will be collected from beneath the rip rap.

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

As discussed during a phone conversation on March 10, 2020, with you consultant, John Storlie, the DNR recommends relocating a portion of the proposed borings to an area more downgradient of the following potential release areas: 1) 1997 Fuel Spill; 2001 Crash Site, and; Airport Fire Station. The purpose would be to evaluate both the potential source areas and downgradient of the potential release areas in one mobilization with the same number of proposed borings.

With the above suggestion in mind, DNR concurs with the site investigation activities proposed to address soil, groundwater, surface water and sediment related to the six (6) potential source areas identified at the facility. The DNR requests that you proceed with the proposed work and offers to review and provide concurrence on any revised boring locations resulting from the above recommendation.

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,

A handwritten signature in black ink that reads "Dave Rozeboom". The signature is fluid and cursive, with the first name "Dave" being more prominent than the last name "Rozeboom".

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

cc: John Storlie, OS Group