

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
1300 W. Clairemont Ave
Eau Claire, WI 54701

Scott Walker, Governor
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May 10, 2019

Teri Lehrke
City Clerk
400 La Crosse St.
La Crosse, WI 54601

Subject: Reopening of Closed Case
La Crosse Municipal Wells 23 & 24,
Fisherman Rd, French Island, La Crosse, WI
DNR BRRTS # 02-32-000065

Dear Ms. Lehrke:

On April 18, 2019, the Remediation and Redevelopment program of the Wisconsin Department of Natural Resources (WDNR) was made aware that Polyfluoroalkyl Substances (PFAS) have been routinely detected in municipal well 23, located on the east side of French Island. After discussing the matter with Utilities Manager, Bernard Lenz, and Water Superintendent, Lee Anderson, and after reviewing the file of the above-mentioned site that investigated VOC impacts to municipal wells 23 and 24, the WDNR has determined that contamination on or from the above-described site poses a threat to public health, safety, welfare or the environment.

The volatile organic compound (VOC) release for which the City of La Crosse was responsible was closed by WDNR on May 5, 2010. Based on the information that has been submitted to WDNR regarding this site, we believe that this newly reported PFAS contamination is related to firefighting foam that was used at the same fire training burn pits which were the source of VOC contamination in municipal wells 23 and 24. The WDNR also believes that a response action in the form of additional investigation and possible remedial action is needed due to the known impacts above the health advisory level to municipal well 23, and the potential for impacts to municipal well 24.

As owner of the property where the residual contamination is found, and the entity that caused the discharge of the hazardous substance, the City of La Crosse is responsible for restoring the environment at the above-described site under s. 292.11, Wis. Stats., known as the hazardous substances spills law. This letter explains how to initiate the investigation and cleanup of contamination of the site, and how to access further information and assistance from the department.

Legal Responsibilities:

Persons meeting the definition of "responsible party" under § NR 700.03(51) Wis. Admin. Code, must follow applicable law to address the discharge of a hazardous substance to the environment or other environmental pollution. Wisconsin Statutes ("Wis. Stats.") ch. 292 and Wis. Admin. Code chs. NR 700 through NR 754 provide specific requirements for undertaking appropriate response actions to address contamination, including requirements for emergency and interim actions, public information, site investigations, remedy selection, design and operation of remedial action systems, and case closure.

Steps to Take:

To ensure that your cleanup complies with Wisconsin's laws and administrative codes, you should hire a professional environmental consultant who understands what needs to be done. The following information provides the timeframes and required steps to take. Unless otherwise approved by WDNR in writing you must complete the work by the timeframes specified.

1. Within the next **30 days**, by June 10, 2019, submit written verification (such as a letter from the consultant) that you have hired an environmental consultant.
2. Within the next **60 days**, by July 10, 2019, have your consultant submit a work plan for completing the investigation. The consultant must comply with the requirements in the NR 700 rule series and should refer to WDNR technical guidance documents. To facilitate prompt agency review of your reports, your consultant should use the site investigation and closure formats which are available on-line at <http://dnr.wi.gov/topic/Brownfields/Professionals.html>.
3. You must initiate the site investigation within 90 days of submitting the site investigation work plan. If a fee for WDNR review has been submitted, the site investigation must begin within 60 days after receiving WDNR comments.
4. Within 60 days after completion of the field investigation and receipt of the laboratory data, you or your consultant must submit a site investigation report to WDNR.
5. Within 60 days after submitting the Site Investigation Report, you must submit a remedial actions options report (RAOR). The RAOR shall include an evaluation of Green and Sustainable Remediation opportunities as required by s. NR 722.09 (2m), Wis. Adm. Code.

Sites where discharges to the environment have been reported are entered into the Bureau for Remediation and Redevelopment Tracking System (BRRTS), a version of which appears on the WDNR's Internet site (BRRTS on the Web). You may view the information related to your site on this database at any time.

If you want a formal response from the agency on a specific submittal, please be aware that a review fee is required in accordance with ch. NR 749, Wis. Adm. Code. If a fee is not submitted with your reports, you should proceed under the advice of your consultant to complete the site investigation to maintain your compliance with the spills law and chapters NR 700 through NR 754. **The timeframes specified above are required by rule; do not delay the investigation of your site.** We have provided detailed technical guidance to environmental consultants. Your consultant is expected to know our technical procedures and administrative rules and should be able to answer your questions on meeting cleanup requirements.

All correspondence regarding this site should be sent to:

Dave Rozeboom
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
1300 W. Clairemont Ave
Eau Claire, WI 54701

Unless otherwise directed, submit one paper copy and one electronic copy of plans and reports. To speed processing, correspondence should reference the BRRTS and FID numbers (if assigned) shown at the top of this letter.

Additional Information for Site Owners:

We encourage you to visit our website at <http://dnr.wi.gov/topic/Brownfields/>, where you can find information on selecting a consultant, financial assistance and understanding the cleanup process. You will also find information about liability clarification letters, post-cleanup liability and more.

If you have questions, feel free to call me at 715-839-3710 for more information or visit the RR Web site at the address above.

Thank you for your cooperation.

Sincerely,



Dave Rozeboom
West Central Region Team Supervisor
Remediation & Redevelopment Program

cc: Tim Kabat, Mayor
Bernard Lenz, Utilities Manager