

From: Michalets, Linda M - DNR
Sent: Thursday, June 03, 2021 11:23 AM
To: Stephen Meer, P.E.; Eric Ogden
Cc: Joshua Neudorfer; Sean Flanagan (sflanagan@hsacommercial.com)
Subject: RE: Former Biogenesis site work plan review letter

Hello Steve,

I have read your work plan response and understand that you are moving forward with your proposed activities without requesting DNR's review. I just want to remind you that the site investigation is an iterative process and that it may be difficult to get to closure without additional PFAS soil sampling, or, at a minimum, without PFAS laboratory analysis of all the monitoring wells to support your conclusion that PFAS are defined.

Thank you for providing the latest round of vapor sampling results.
Linda

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Linda Michalets

she/her/hers

Hydrogeologist – Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

2300 N. Dr. Martin Luther King, Jr. Drive

Milwaukee, WI 53212

Cell Phone: 414-435-8010

linda.michalets@wisconsin.gov



From: Stephen Meer, P.E. <smeer@thesigmagroup.com>
Sent: Thursday, May 20, 2021 8:52 AM
To: Michalets, Linda M - DNR <Linda.Michalets@wisconsin.gov>; Eric Ogden <eogden@hsacommercial.com>
Cc: Joshua Neudorfer <jneudorfer@thesigmagroup.com>; Sean Flanagan (sflanagan@hsacommercial.com) <sflanagan@hsacommercial.com>
Subject: RE: Former Biogenesis site work plan review letter

Good morning Linda,

We are providing this electronic correspondence in response to the Department's letter dated March 16, 2021.

Sub-Slab Vapor Sampling Update

In accordance with the *Supplemental Site Investigation Work Plan* dated December 28, 2020, The Sigma Group, Inc. (Sigma) on behalf of Oak Creek Rawson Industrial, collected an additional round of sub-slab vapor samples from the existing sub-slab vapor sample points installed within the existing Site building located at the subject property on March 4, 2021. The passive ventilation system has remained sealed since prior to collection of the first post-construction sub-slab sampling event on January 3, 2020 and remained sealed between the sub-slab sampling events including during the March 4, 2021 event. The site building is currently occupied by one tenant who utilizes the western approximately 1/3 of the building including the area where sub-slab sampling points VP-1 through VP-4 are located. The remainder of the site building, including the area where sub-slab sample points VP-5 and VP-6 are located is not occupied however building HVAC systems within this portion of the building (generally open warehouse space) operate normally.

The sub-slab vapor sampling points are installed with flush-mount covers and remain sealed between sampling events. A laboratory supplied summa canister equipped with a flow controller to collect a six liter sample over a period of approximately 30 minutes was connected to each sample point using new nylon tubing. Prior to sample collection, a "shut-in" test is completed on the tubing connected to the sample can by introducing a vacuum pressure into the sample train using a hand-powered vacuum pump. The vacuum pressure within the sample train is measured over a period of at least 5 minutes to ensure the vacuum level remains stable and there are no leaks within the sample train. Following "shut-In" test completion and prior to collection of the sub-slab samples, each sample point was purged using a photo-ionization detector to remove ambient air introduced during unsealing of the point/connection to the sample train tubing. Following purging, the sample at each location was collected by opening the control valve on the summa can.

The March 4, 2021 samples were submitted for laboratory analytical consistent with previous sub-slab sampling events; sub-slab samples collected from sample points VP-1, VP-2, VP-5 and VP-6 were analyzed for petroleum VOCs (PVOCs) and naphthalene and samples collected from points VP-3 and VP-4 were analyzed for PVOCs and naphthalene and select chlorinated VOCs (CVOCs) previously identified as contaminants of concern at the site. An updated table (**Table 2**) summarizing the sub-slab sampling results is attached. Results from the March 4, 2021 sampling event were consistent with results of previous post-construction sampling events and indicate sub-slab concentrations of identified contaminants of concern with the potential to pose a vapor intrusion risk remain well below applicable Vapor Risk Screening Levels (VRSLs). Based on the sub-slab sampling results, an identified post-construction vapor intrusion risk to the site building associated with residual VOC impacts is not present. Therefore, maintenance of the passive sub-slab vent system will not be recommended as a continuing obligation at the time of regulatory case closure.

Additional Emerging Contaminants Investigation

Sigma and Oak Creek Rawson Industrial acknowledge the Department's request for the collection of additional soil samples for laboratory analysis of PFAS. Based on that request, in addition to the proposed soil sample collection as part of the additional groundwater monitoring well to be installed in the right-of-way to the northeast of the site, collection of a soil sample for laboratory analysis of PFAS from the boring associated with the proposed additional groundwater monitoring well location to the southeast of well SMW-6 will be incorporated into the proposed scope of work (additional proposed

well locations are illustrated on the attached **Figure 6**). The soil sample from the southeast well location will be collected at a depth representative of soil undisturbed during site redevelopment (approximately 3 feet below current grade). Prior to development of a plan for additional soil sampling for PFAS beyond the location of the two additional groundwater monitoring wells, Sigma recommends collecting additional groundwater data, consistent with the scope proposed in the December 2020 work plan (including laboratory analysis for the Wisconsin list of 33 constituents).

Therefore, Oak Creek Rawson Industrial is notifying the Department of our intention to proceed with the scope of work recommended in the December 2020 work plan with the additional soil sampling at the southeast groundwater monitoring well as discussed above. Following completion of the additional investigation a report providing the additional results and recommendations based on those results will be provided to the Department.

Please let us know if you have any questions.

Regards,

Stephen R. Meer, P.E.

Senior Engineer

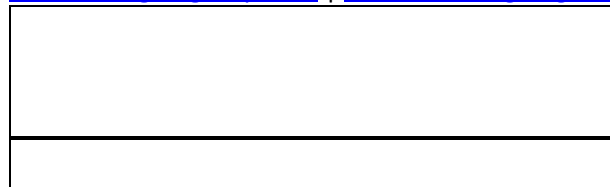
The Sigma Group, Inc.

(414) 643-4124 (direct)

(414) 588-8910 (mobile)

[1300 W. Canal Street, Milwaukee, WI 53233](https://www.thesigmagroup.com)

www.thesigmagroup.com | smeer@thesigmagroup.com



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From: Michalets, Linda M - DNR <Linda.Michalets@wisconsin.gov>

Sent: Tuesday, March 16, 2021 9:54 AM

To: Eric Ogden <eogden@hsacommercial.com>; Stephen Meer, P.E. <smeer@thesigmagroup.com>

Subject: Former Biogenesis site work plan review letter

Dear Messrs. Ogden and Meer,

I have attached the work plan review letter for the Former Biogenesis site, BRRS #02-41-107191. Please let me know if you have questions about anything in the letter.

Thank you,

Linda

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