

From: Feeney, John M - DNR
Sent: Thursday, March 12, 2020 8:34 AM
To: 'Alyssa Flandermeyer'; John Osborne
Cc: Eric E Thom; Harrington, Arthur
Subject: RE: BRRTS #02-67-151266 Scope of Work Proposal

Hello Ms. Flandermeyer and Mr. Osborne. The DNR has reviewed the Dec. 13, 2019 work plan scope for the Decorah Shopping Center Annex (02-67-151266). Our comments are presented below:

VI Assessment in Four Homes (961, 980, 981, 1006 West Lincoln Drive)

If the mitigation systems will be installed directly, sub-slab and indoor air samples must be collected prior to installation of the mitigation systems. The DNR will need that information to 1) assess the effectiveness of the systems, 2) differentiate between indoor and sub-slab sources to indoor air, 3) satisfy the requirement of NR716.11(5), 4) determine if a continuing obligation will be necessary, and 5) to further assess the risk to other houses. Regardless of the results of those samples, the systems will need to be commissioned per guidance document RR-800. As TCE is a contaminant of concern at this site, it must be determined if any women of child-bearing age reside in the houses as discussed in Section 3.4.1 of RR-800 and address those houses sooner. If that is the case, the DNR suggests prioritizing mitigation in those houses, use a quick lab turnaround for indoor air samples, and do a post-mitigation follow-up sample sooner to make sure levels have dropped below a VAL if they were above it initially. If it is decided to proceed with a more typical sampling program, expeditiously sample at any house with such a sensitive individual.

Other Homes

Regardless of the results or approach at the four houses mentioned above, there are clearly other occupied structures that should be sampled based on the screening criteria in Section 3.4.2 of RR-800. These include houses overlying the plume above an ES, and maybe within 100 feet of contaminated soil, such as behind the strip mall and probably some retail spaces within the strip mall itself. Submit a proposal which systematically discusses which occupied structures/spaces are within RR-800 screening guidelines. Groundwater concentrations appear to be increasing at some wells, so further refinement of the assessment area will likely be needed. Again, given the presence of TCE and its related health risks, demographics should be assessed and used to guide assessment. External soil gas probes are not adequate to make decisions on whether a house should be sampled at this site.

Sewers

The first step should be to obtain complete records of the sewer system in this area, including construction, flow direction, repair, cleaning, video-logging, etc. including Hawthorne Avenue from the City. The proposal should include a plan to assess possible vapor movement within the sewer pipes. Although a PID may provide some information, taking grab samples with Summa cannisters and analyzing them with method TO-15 would likely be necessary to complete this evaluation.

Other Comments

1. Request an exemption to NR 169 to select a new consultant without bidding.
2. Typically, to rule out a home from the vapor pathway, a minimum of 3 rounds of sampling is needed for homes not over VAL/VRSL, with an emphasis on sampling during the heating season.

Please let me know if you have any questions. Thank you

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John Feeney

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From: Alyssa Flandermeyer <aflandermeyer@cproperties.com>

Sent: Friday, December 13, 2019 10:28 PM

To: Feeney, John M - DNR <JohnM.Feeney@wisconsin.gov>; John Osborne <John.Osborne@gza.com>

Cc: Eric E Thom <ethom@cproperties.com>; Harrington, Arthur <ajharrin@gklaw.com>

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Mr Feeney,

Please see attached for the scope of work proposal for DERF Funding reimbursement at the Decorah Annex site in West Bend, WI.

Please let me know if you have any questions.

Thank you,

Alyssa Flandermeyer

Development Coordinator



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