

Schultz, Josie M - DNR

From: Schultz, Josie M - DNR
Sent: Wednesday, October 28, 2020 2:34 PM
To: 'Andy Delforge'
Subject: V&L Stripping 02-05-216722 VMS comments and next steps
Attachments: 4400-321.pdf

Hi Andy,

Thanks for taking time to talk to me this morning about V&L Stripping. As mentioned during the call, an OM&M plan needs to be submitted with the vapor mitigation system documentation report, along with a site-specific inspection log (fillable version attached). [RR-981](#), along with section 10 and Appendix E of [RR-800](#) provide guidance on maintenance plan requirements for vapor mitigation systems. Please let me know if you have any questions for requirements of the OM&M plan and/or inspection log after review of these guidance documents.

One thing I meant to mention on the phone call is the pressure field extension testing for the VMS. I see that vacuum readings were taken from the two temp wells inside, but noticed TW-1400 didn't read a vacuum. Are there still vapor ports within the building that you would be able to take vacuum readings from? I don't believe DNR has a map of these vapor port locations, and it looks like they were installed and sampled by Shaw in 2010. We need some form of verification that the system has good communication across the entire slab.

Next steps for the site should include vapor sampling in nearby residences. DNR's vapor screening criteria recommends investigation of any building within 100 feet of CVOCs in soil, or overlying a groundwater CVOC plume with ES exceedances. This should include 856 Mather street and 714 Lincoln Street at a minimum, and may require stepping out from there. Residential vapor sampling requires a minimum of 2 (preferably 3) rounds of concurrent sub-slab (30 min) and indoor air (24 hr) sampling, and **only need to analyze CVOCs in vapor, not full suite.**

We also will need screening for in-pipe preferential pathways (e.g. sanitary and storm sewer). You had mentioned today that the RP, Ken Juza, built the building himself so there may be new sanitary lateral on-site and sanitary sewer replaced in the road during road construction.

Please let me know if you have any questions about the VMS documentation that's needed, or the next steps outlined above.

Thanks,
Josie

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