


**From:** Schultz, Josie M - DNR  
**Sent:** Thursday, May 30, 2024 6:02 PM  
**To:** tott@fecinc.us; Rick Frieseke  
**Cc:** Lensmire4@gmail.com  
**Subject:** Post-Closure Modification for Twin Brook Cleaners, 02-60-248337

Hi Trent,

Thank you for the conversation today to discuss the Twin Brook Cleaners post-closure modification (PCM). As mentioned during our call, the DNR has the following recommendations:

1. DNR recommends that the passive mitigation system beneath the new building addition be tied into the existing active mitigation system's fan to make it active as well.
  - a. DNR **strongly** recommends that a National Radon Proficiency Program (NRPP) certified radon mitigator make changes to the system.
2. DNR understands that the property owner and/or renter have concerns with installation of pressure field extension (PFE) points in the floor of the building due to there being an epoxy coating. In lieu of PFE testgin, DNR is requesting that a proposal be submitted for an alternate commissioning plan and schedule.
  - a. DNR has commissioning guidelines in Appendix D of RR-800, which recommends measurement of differential negative pressure (i.e. vacuum) at PFE monitoring points to show that the system is capturing vapors. DNR recommends a minimum of three PFE monitoring events over the time period of no less than 6 months, with paired indoor air sampling.
  - b. Because PFE testing will not be completed, DNR is requesting that a proposal for alternate commissioning sampling be submitted with the following considerations:
    - i. Recommend a minimum of 3 rounds of long-duration, passive indoor air sampling in a minimum of two locations in the building; one in the new addition and one near the center of the original building (i.e. in the area of VP-B). At least one round needs to be completed in the winter heating season.
    - ii. DNR recommends that the first round of sampling occur over the duration of 7-14 days, then possibly consider a longer duration (e.g. 3-4 weeks) for subsequent events if concentrations are well below standards. The results should be submitted to DNR within 10 days of receiving the results from the lab.
    - iii. Limit sample analysis to contaminants of concern (PCE, TCE, trans & cis-DCE, VC).
    - iv. If there are detections of CVOCs in indoor air, then additional indoor air sampling beyond the 3 rounds will likely be required.
3. Once the VMS is fully commissioned, the final construction documentation, OM&M plan and inspection log for the vapor mitigation system will need to be submitted along with an updated cap maintenance plan with updated photos, map, and inspection log.
  - a. DNR guidance document [RR-981](#) can be referenced for VMS maintenance plans.
    - i. This guidance is pretty outdated (from 2014), but gives a basic outline of what is needed.
  - b. The original cap and VMS mtc plan can be found on pages 13-26 of the 2012-09-10 CO Packet, AC 56, tracked on [BOTW](#).

2012-09-10	56	<u>Continuing Obligation(s) Applied</u>	
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4. DNR will need form 4400-237 filled out and submitted with a post-closure modification request with the associated \$1700 fee (\$1050 CO modification fee +\$350 groundwater/vapor GIS fee +\$300 soil GIS fee).
  - a. The proposal for alternative commissioning sampling should be included with this request.

If you have any questions or concerns, please feel free to call or email me.

Thank you,  
Josie

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Josie M. Schultz

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