

Gray, Jane K - DNR

From: Gray, Jane K - DNR
Sent: Wednesday, October 30, 2024 2:00 PM
To: Robert Fedorchak; Shane LaFave; Que El-Amin; Angy Singh; Pratap Singh
Cc: Mylotta, Pamela A - DNR; Nobile, Trevor W - DNR; Golec, Jason; Arroyo-Vega, Jezamil; Kloczko, Nathan F - DHS; Westrich, Christine
Subject: RE: CWC East Block (02-41-263675) - Meeting Follow-up

Follow Up Flag: Follow up
Flag Status: Completed

Good afternoon Rob – Thank you for your email. Historically, DNR’s definition of the term “heating season” has varied or not been defined and is sometimes understood to range from November to April. As winter temperatures in Wisconsin have been highly variable in recent years, winter heating season is considered by the DNR as being December 1 through March 31. This specific timeframe is used for the recommended sampling period for when reasonable maximum exposure is more likely.

As indicated in the May 2024 DNR letter, the March 2024 commissioning event may not have occurred when building and weather conditions were most representative of the worst-case scenario for vapor intrusion. The requested 2024/2025 heating season commissioning event will provide necessary data to demonstrate that the VMS will prevent vapor intrusion from impacting the breathing space in the building over the long-term operation of the system. Additionally, the 2024/2025 heating season commissioning event is necessary to evaluate site conditions after the sub-slab vapor contamination has equilibrated with the materials used to fill the hot spot soil excavations.

As I indicated below and as we discussed in our meeting on October 21, 2024, although the DNR has guidelines on what is typically requested for commissioning events, the DNR reviews commissioning information on a case-by-case basis based on site-specific information, such as the type and concentrations of contamination identified in the environment at a given site. The ultimate goal of the commissioning process is to provide enough data over varying temperature and pressure conditions to show that a vapor mitigation system is and will continue to effectively mitigate vapor intrusion to prevent significant damaging effects on indoor air quality for present or future use. Please keep in mind that the DNR cannot close a site if the residual contamination is likely to cause a VAL to be attained or exceeded (Wis. Admin. Code § NR 726.05(4)(e)) and so the VMS has to be fully commissioned, including during worst-case scenarios (winter heating season).

Thank you and please let me know if you have any questions.

Best, Jane

Jane Gray

she/her/hers

Phone: (414) 435-8021

jane.gray@wisconsin.gov

Our core values include professionalism, integrity, and customer service.

Please visit our [survey](#) to provide feedback on your experience interacting with any DNR employee.

From: Robert Fedorchak <rfedorchak@patrioteng.com>

Sent: Friday, October 25, 2024 3:55 PM

To: Gray, Jane K - DNR <jane.gray@wisconsin.gov>; Shane LaFave <Shane@roerscompanies.com>; Que El-Amin <que@scott-crawford.com>; Angy Singh <angy.singh@ksinghengineering.com>; Pratap Singh <psingh@ksinghengineering.com>
Cc: Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>; Nobile, Trevor W - DNR <Trevor.Nobile@wisconsin.gov>; Golec, Jason <JGOLEC@milwaukee.gov>; Arroyo-Vega, Jezamil <javega@milwaukee.gov>; Kloczko, Nathan F - DHS <nathan.kloczko@dhs.wisconsin.gov>; Westrich, Christine <chwest@milwaukee.gov>
Subject: Re: CWC East Block (02-41-263675) - Meeting Follow-up

**CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Jane,

Thank you for the follow-up email. Would the WDNR please provide a definition of "heating season" as it pertains to commissioning, specifically what span of time is considered applicable to conduct commissioning activities. For example, Indiana uses Mid-November through March and Minnesota uses November 1 through March 31 as their definition of heating season.

Thank you and have a great weekend!

Sincerely,



Robert S. Fedorchak, P.E.
Senior Project Engineer

Patriot Engineering and Environmental, Inc.
6150 East 75th Street | Indianapolis, IN 46250
mobile: 317.441.5633
direct: 317.558.5029

office: 317.576.8058
email: rfedorchak@patrioteng.com
www.patrioteng.com



From: Gray, Jane K - DNR <jane.gray@wisconsin.gov>

Sent: Wednesday, October 23, 2024 8:59 AM

To: Shane LaFave <Shane@roerscompanies.com>; Que El-Amin <que@scott-crawford.com>; Angy Singh

<angy.singh@ksinghengineering.com>; Pratap Singh <psingh@ksinghengineering.com>; Robert Fedorchak <rfedorchak@patrioteng.com>

Cc: Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>; Nobile, Trevor W - DNR <Trevor.Nobile@wisconsin.gov>; Golec, Jason <JGOLEC@milwaukee.gov>; Arroyo-Vega, Jezamil <javega@milwaukee.gov>; Kloczko, Nathan F - DHS <nathan.kloczko@dhs.wisconsin.gov>; Westrich, Christine <chwest@milwaukee.gov>

Subject: CWC East Block (02-41-263675) - Meeting Follow-up

Good morning all – Thank you again for taking the time to meet on Monday (10/21) to discuss the subject site. Below are some of the takeaways and next steps with respect to DNR’s review of the VMS commissioning process:

- CWC will submit a commissioning report with a technical assistance fee likely by mid-November for the fall 2024 commissioning event that includes the data from commissioning events 3A and 3B. This report should include a plan for the upcoming winter 2024/2025 commissioning event for DNR review. The DNR requests that a comprehensive raw excel document of the indoor air data be submitted to me via email alongside the submittal of this report. As has been typical throughout the NR 700 process at this site, the DNR has a goal to provide CWC with an expedited review of this next commissioning report to allow for CWC to efficiently plan for and perform their winter 2024/2025 commissioning event. Note that the DNR recommends that this report be submitted as early as possible, as the upcoming end of the year holiday season may impact our technical team’s working hours.
- CWC will submit a draft interim action report, which will include commissioning information and the draft operation maintenance and monitoring plan, to the DNR with a technical assistance review fee likely in mid-November in tandem with the fall 2024 commissioning report. The DNR will respond to this draft document with comments for CWC to implement into their final interim action report that must be submitted following the final commissioning event and is required before the DNR can approve the VMS commissioning process. Please see the attached May 2024 DNR letter with additional information on this required report.
- As requested during the meeting, information on VMS commissioning can be found within the DNR’s guidance document RR-800 (linked [here](#)) in Section 9, *System Commissioning*, and in Appendix D, *Commissioning Guidelines*. Appendix D specifically mentions heating season testing and Section 8 of the report, *Mitigation Design*, also discusses the heating season and the stack effect it can induce on a building. Please understand that DNR’s requirements for VMS commissioning may differ slightly from site to site depending on site-specific information, such the type and concentrations of contamination identified in the environment at a given site.

Please do not hesitate to reach out if you have any follow-up questions.

Best wishes, Jane

Jane Gray

she/her/hers

Hydrogeologist Program Coordinator - Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

West Central Region

Phone: (414) 435-8021

jane.gray@wisconsin.gov



Our core values include professionalism, integrity, and customer service.

Please visit our [survey](#) to provide feedback on your experience interacting with any DNR employee.



