

Gray, Jane K - DNR

From: Pratap Singh <psingh@ksinghengineering.com>
Sent: Wednesday, December 18, 2024 5:33 PM
To: Gray, Jane K - DNR
Cc: Que El-Amin; Kathryn Balachandran; Shane LaFave; Robert Fedorchak; Taylor Bosacker; Walden, James E -DNR; Mylotta, Pamela A - DNR
Subject: RE: Community Within the Corridor – East Block (02-41-263675) - Technical Assistance Letter
Attachments: Air Flow Rate for Radiello 130 Samplers; CWC EB HVAC Report.pdf
Follow Up Flag: Follow up
Flag Status: Completed

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Hi Jane,

Thank you for sending the additional information about Radiello Passive Samplers. We selected passive sampling using the Radiello 130 based on the understanding that they do not require a minimum air flow rate in the traditional sense because they operate based on the principle of diffusion rather than an active air flow. The samplers are designed to passively collect target analytes from the air through molecular diffusion, where the compounds diffuse into the sampler over a specified exposure period. The diffusion process relies on the concentration gradient of the analyte in the air, so a higher air exchange or more open environments could lead to a greater diffusion rate, but this is not a "minimum flow rate" that the user must control. Moreover, with an active HVAC, air flow is controlled.

Further, per Attachment 1 that you sent and expanding on the text in the first paragraph, two things are important to note :

- The principle of operation of Radiello Passive sampler is based on mass transfer using Ficks Law which uses concentration gradient of analytes as a basis for contaminant transport. Momentum transfer by inducing speed is not considered in the equation.
- on page 52, it notes that “Sampling rate is invariant with humidity in the range 15 ÷ 90% and with wind speed between 0.1 and 10 m·s-1.” The passive samplers are more impacted by temperature, which we have accounted for and been documenting. Please also note that Attachment 1 provided by WDNR refers to the minimum air flow rate for passive sampling specifically in soil gas.

We also reached out to Eurofins Air Toxics and their response is attached. There is a typo in the 1st bullet where it should say 20 ft/min. Air Toxics interpretation is consistent with industry standard practices where there is no need for additional ventilation in a facility where HVAC is fully operational.

Please note that the air flow rate at CWC-East Block units is 120 cfm based on the HVAC report (refer to attachment). In our opinion, the flow rate is such that additional ventilation is not necessary. Having said this, we are prepared to introduce additional air flow as required by WDNR. We will be starting the 4th round of commissioning tomorrow. Please let us know if you have any questions.

Thank you,

Pratap N. Singh, Ph.D., PE

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

Sent: Monday, December 16, 2024 1:04 PM

To: Angy Singh <angy.singh@ksinghengineering.com>

Cc: Que El-Amin <que@scott-crawford.com>; Pratap Singh <psingh@ksinghengineering.com>; Kathryn Balachandran <kbalachandran@ksinghengineering.com>; Shane LaFave <Shane@roerscompanies.com>; Robert Fedorchak <rfedorchak@patrioteng.com>; Taylor Bosacker <taylor.bosacker@roerscompanies.com>; Walden, James E -DNR <jamese.walden@wisconsin.gov>; Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>

Subject: RE: Community Within the Corridor – East Block (02-41-263675) - Technical Assistance Letter

Hi Angy – Thank you for providing this email update. Attached are two reference documents for the Radiello passive samplers. Please refer to Figure 1 of “Attachment 2”, which discusses the necessary air flow rates to achieve reliable indoor air results using the Radiello samplers. This document was taken from the sigma-aldrich.com/radiello webpage. “Attachment 1” is from the Radiello webpage (radiello.com).

Please do not hesitate to reach out if you have any further questions.

Thank you, Jane

Jane Gray

she/her/hers

Phone: (414) 435-8021

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From: Angy Singh <angy.singh@ksinghengineering.com>

Sent: Friday, December 13, 2024 4:54 PM

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

Cc: Que El-Amin <que@scott-crawford.com>; Pratap Singh <psingh@ksinghengineering.com>; Kathryn Balachandran <kbalachandran@ksinghengineering.com>; Shane LaFave <Shane@roerscompanies.com>; Robert Fedorchak <rfedorchak@patrioteng.com>; Taylor Bosacker <taylor.bosacker@roerscompanies.com>

Subject: RE: Community Within the Corridor – East Block (02-41-263675) - Technical Assistance Letter

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Hi Jane,

Thank you for the letter. As discussed this morning, we will be proceeding with our plan for commissioning next week and will be adjusting our plan according to WDNR's feedback. We did want to follow up on one item in the letter regarding the Radiello 130 passive samplers. Could you share the source/documentation detailing the air flow rate requirements for this type of sampler? We spoke with Eurofins Air Toxics who provide the passive samplers, and they did not indicate any such requirement. We'd like to confirm if you have additional information leading into next week and make sure we are prepared.

Thanks, and have a nice weekend!

Angy K. Singh, Ph.D.

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

Sent: Friday, December 13, 2024 11:09 AM

To: Shane LaFave <Shane@roerscompanies.com>

Cc: Que El-Amin <que@scott-crawford.com>; Pratap Singh <psingh@ksinghengineering.com>; Kathryn Balachandran <kbalachandran@ksinghengineering.com>; Robert Reineke <rreineke@ksinghengineering.com>

Subject: Community Within the Corridor – East Block (02-41-263675) - Technical Assistance Letter

Good morning Shane – As was discussed with K. Singh this morning, please see the attached DNR letter, and do not hesitate to reach out if you have any questions.

Thank you, Jane

Jane Gray

she/her/hers

Hydrogeologist Program Coordinator - Remediation and Redevelopment Program

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Gray, Jane K - DNR

From: Heidi Hayes <Heidi.Hayes@et.eurofinsus.com>
Sent: Wednesday, December 18, 2024 11:53 AM
To: Angy Singh
Cc: Kathryn Balachandran; Pratap Singh; Robert Reineke; rfedorchak@patrioteng.com; Jade White
Subject: Air Flow Rate for Radiello 130 Samplers

Some people who received this message don't often get email from heidi.hayes@et.eurofinsus.com. [Learn why this is important](#)

Dear Angy,

Thank you for providing the attachments and highlighting WDNR's requirement regarding air flow conditions for the Radiello 130 samplers. We've reviewed the materials and investigated the guidance referenced in the documents you shared.

1. Air Flow Minimum Requirement (10 cm/s):

- The 10 cm/s value is the lower range of air velocity used by the Radiello vendor in determining the published sampling rates using their standard atmosphere chamber, with the upper range being 10 m/s. The 10 cm/s air velocity minimum condition cited in the Attachments (Radiello.com and Sigma-Aldrich documentation) ensures that the sampler operates under conditions where air movement supports the published diffusive sampling rate, preventing potential starvation of the sampler in stagnant environments. The Sigma-Aldrich specifically calls out soil gas as an application where lower face velocities affect the sampling rate.

2. EPA Studies:

- Historically, the EPA has not monitored or documented air velocity (e.g., >10 cm/s) as a parameter during research with Radiello samplers for indoor air monitoring. Their studies focused on performance in a variety of environments, assuming typical air movement conditions with functioning HVAC systems.
- These studies demonstrated reliable results in indoor air monitoring scenarios without specific documentation of air velocity.

3. Practical Context for Air Flow:

- The required 10 cm/s air velocity corresponds to a very low air movement threshold (approximately 2 feet per minute). In buildings with active HVAC systems, this condition is typically considered easily achievable under normal operational circumstances by placing samplers in open and unobstructed areas.
- However, in low-flow zones or areas with stagnant air (e.g., unoccupied rooms with no ventilation such as a closet), it may be necessary to consider supplementing air flow via fans or consider alternative sampling placements.

Please let us know if WDNR has provided specific guidelines on verifying air velocity or if further clarification is required from our team. We're committed to supporting your monitoring program and ensuring reliable data for your project.

Regards,

Heidi Hayes
Technical Director

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AIR BALANCE TEST REPORT



Project Name: CWC East Block 2A East Block
3100 W Center St Milwaukee
 ERV - Bath Exhaust
 System: HE1.5XRTR ERV/ RTU

Page 1 OF 1
 Date 1/24/2024
 Technician DA

Area served	Type	Size	Kitchen		Bath1		Bath2		Notes
			CFM		CFM		CFM		
2B 2082	CD	4"	20		20		X		
2B 2083	CD	4"	20		20		X		
2B 2084	CD	4"	20		20		X		
2B 2085	CD	4"	20		21		X		
2B 2086	CD	4"	20		21		X		
2B 2087	CD	4"	20		20		X		
2B 2088	CD	4"	20		20		X		
2B 2092	CD	4"	20		20		X		
2B 2093	CD	4"	21		20		X		
2B 2094	CD	4"	20		20		X		
2B 2095	CD	4"	20		20		X		
2B 2096	CD	4"	20		20		X		
2B 2097	CD	4"	20		21		X		
2B 2098	CD	4"	20		21		X		
3B 3082	CD	4"	20		20		X		
3B 3083	CD	4"	20		20		X		
3B 3084	CD	4"	20		21		X		
3B 3085	CD	4"	20		21		X		
3B 3086	CD	4"	20		21		X		
3B 3087	CD	4"	20		21		X		
3B 3088	CD	4"	20		21		X		
3B 3092	CD	4"	20		21		X		
3B 3093	CD	4"	20		21		X		
3B 3094	CD	4"	20		21		X		
3B 3095	CD	4"	20		20		X		
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3B 3098	CD	4"	20		21		X		

