



January 21, 2025

Roers Companies  
c/o: Shane LaFave  
110 Cheshire Lane, Suite 120  
Minnetonka, MN 55305  
Via Email Only to [shane@roerscompanies.com](mailto:shane@roerscompanies.com)

Subject: Technical Assistance Response  
Community Within the Corridor – East Block  
2748 N. 32<sup>nd</sup> Street, Milwaukee, WI 53210  
BRRS #02-41-263675, FID #241025400

Dear Mr. LaFave:

On December 12, 2024, the Wisconsin Department of Natural Resources (DNR) received, *Operation, Maintenance, and Monitoring Manual* (the Report), prepared by K. Singh & Associates, Inc. (K. Singh) on behalf of Community Within the Corridor (CWC) for the subject site. A technical assistance fee of \$700 was submitted on January 16, 2025, for DNR review and response to the Report. The DNR reviewed the Report for compliance with Wisconsin Statutes (Wis. Stats.) ch. 292 and Wisconsin Administrative (Wis. Admin.) Code chs. NR 700-754. The DNR provides the following feedback in response to the Report, as outlined in this letter.

#### Report Review

Please include the following revisions and clarifications in an amended Operations, Maintenance, and Monitoring (OM&M) Plan. The OM&M Plan can be submitted with the documentation outlined in the *Next Steps* section of the letter.

1. A long-term monitoring plan is required to meet the requirements of Wis. Admin. Code §§ NR 724.17 and NR 727.05(1)(b). The Report provides a 5-year operation, maintenance, and monitoring schedule for the vapor mitigation system (VMS) through 2029, instead of a long-term monitoring plan. If a long-term OM&M plan has not been received and approved by DNR within this 5-year period, the plan presented in the Report should be continued until the long-term OM&M plan is received and reviewed by DNR. Please include a provision in the OM&M Plan to develop a long-term OM&M plan before case closure is requested, and to annually continue the OM&M Plan, at a minimum, until DNR approves either an alternate or a long-term OM&M plan.
2. The stormwater management/subsurface dewatering components, including the sumps, are essential features of the VMS. Incorporate these features into the OM&M Plan narrative and update the documentation in Appendix B to include inspection requirements and associated photographs for these features.
3. The sealed migration pathways within the site building features, including but not limited to, the flooring, wooden columns, and brick walls, are essential components of the VMS. Incorporate these features into the OM&M Plan narrative and update the documentation in Appendix B to include inspection requirements and associated photographs of these features.

4. The above-ground piping components of the VMS must be incorporated into the OM&M Plan. Include details on the connection locations and components between the sub-slab piping, above-ground piping and roof blowers and general locations and accessibility of the above-ground piping, locations of piping junctions, and other key features of the above-ground piping. Clarify whether there are separate zones of sub-slab and above-ground piping that correlate with specific blowers. In addition to the site-wide figures provided in the Report, include figures that clearly label these piping features. If applicable, differentiate the zones of piping that may correlate with each blower. The DNR recommends that this piping information be displayed on detailed figures specific to each building section and/or blower that they correlate with, similar to the building section-specific figures displayed in Appendix C-2, *GC Sampling Locations*. Please update the documentation in Appendix B as needed to include inspection requirements and associated photographs of these features.
5. Section 3.3 of the Report indicates that Figure 3, *Vapor Mitigation System Constructed Layout – Ground Level*, displays the vapor pins that will be used to measure sub-slab vacuum, however, the vapor pins are not displayed on this figure but are located on Figure C-1, *Sub-Slab Vapor Pin Locations*. Update the narrative to reference the correct figure.
6. Please clarify whether indoor air sampling will be completed if system malfunctions are identified, or if indoor air sampling will be limited to regularly scheduled monitoring events, as outlined in Table 4. Update the OM&M Plan accordingly.
7. Update Section 4.3.4, *Indoor Air Concentration Exceedances*, to include a plan to immediately reduce residents' exposure if a vapor action level (VAL) is exceeded in future monitoring events, which may include, but is not limited to, deployment of an air purification unit or temporary resident relocation.
8. In a phone call with K. Singh on January 7, 2025, K. Singh informed the DNR that the telemetry system was experiencing false alarms due to winter weather impacting the telemetry components. Include a section in the OM&M Plan addressing this potential operating problem and plans to resolve the problem.
9. Figure 4, *Vapor Mitigation System Stormwater Management – Ground Level*, includes CCTV access point locations. Include additional information in the OM&M Plan on what these locations represent, what function they perform for the VMS, and how they will be operated, maintained, and monitored.
10. Update Section 5.3., *Emergency Reporting and Maintenance Contacts*, to specify that, in addition to the DNR, the Milwaukee Health Department will be notified in an emergency situation.
11. The telemetry system performance monitoring data collected for each device should accompany the OM&M reports generated following each event outlined in Table 4 of the Report, and annually thereafter. Update the OM&M Plan accordingly.
12. Include a provision in the OM&M Plan indicating the contacts listed in Table 6, *Emergency Contacts & Maintenance Contractors List*, will be updated as soon as possible when personnel changes may be made/known.
13. Finally, please include the applicable QA/QC data alongside all indoor air data that is collected using the portable gas chromatograph unit.

The feedback provided in this letter serves as an initial review of the OM&M Plan for the VMS at the subject site. The DNR may request additional information and/or revisions to the OM&M Plan after receiving and reviewing the additional necessary documentation outlined below.

#### Next Steps

As CWC continues to move through the commissioning process, the DNR would like to note for CWC the following regulatory requirements for future planning and scheduling purposes.

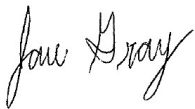
- Per Wis. Admin. Code § NR 724.15, submit a construction documentation or as-built report within 60 days after the date that construction of all interim actions is completed. The as-built report should include the VMS commissioning summary report. Alternatively, these reports can be submitted

separately, but both reports must be submitted prior to CWC requesting DNR's approval of the VMS. Submit the applicable technical assistance review fee for DNR review and response to these reports, per Wis. Admin. Code § NR 749.04.

- In accordance with Wis. Admin. Code § 724.15(3)(h), submit a revised OM&M Plan alongside the as-built report. The DNR recommends that the OM&M Plan be included in an appendix or as a supplemental document that can be easily separated from the construction details and provided to individuals responsible for performing the operation, maintenance, and monitoring.
- As outlined in the DNR's *Remedial Action Options Report Review* letter, dated December 11, 2023, the as-built report should include a detailed narrative and supporting photo documentation on the sealing efforts that are performed for various building features, such as columns, walls, floors, and other building features. This report should also include operation and discharge information for the sumps at the site as they are part of the VMS.

The DNR looks forward to continuing to work with you on this project and appreciates the actions you are taking to mitigate the effects of environmental contamination at this site. If you have any questions regarding this site or this letter, please contact me, the DNR Project Manager, at (414) 435-8021 or [jane.gray@wisconsin.gov](mailto:jane.gray@wisconsin.gov).

Sincerely,



Jane K. Gray  
Hydrogeologist Program Coordinator  
Remediation & Redevelopment Program  
West Central Region

cc: Mr. Que El-Amin, Scott Crawford, Inc., [que@scott-crawford.com](mailto:que@scott-crawford.com)  
Dr. Pratap N. Singh, K Singh & Associates, Inc., [psingh@ksinghengineering.com](mailto:psingh@ksinghengineering.com)  
Dr. Kathryn Balachandran, K Singh & Associates, Inc., [kbalachandran@ksinghengineering.com](mailto:kbalachandran@ksinghengineering.com)  
Mr. Robert Reineke, K. Singh & Associates, Inc., [reineke@ksinghengineering.com](mailto:reineke@ksinghengineering.com)