Gray, Jane K - DNR

From: Gray, Jane K - DNR
Sent: Wednesday, February 12, 2025 1:25 PM
To: Pratap Singh
Cc: Angy Singh; Shane LaFave; Que El-Amin
Subject: CWC East Block (02-41-263675) - Information Requested

Hi Dr. Singh – As I mentioned in my voicemail just now, the DNR has reviewed the *Fourth Round of Commissioning* (Report), submitted on January 20, 2025, for the subject site. The following information is required before the DNR can issue a response letter for the Report:

Continuous Monitoring of Units 1045 and 1050

Page 6 of the Report states, "At no point during the 14-day sampling period did the detected indoor air concentration of TCE for either unit exceed the Method Detection Limit (MDL) of 0.6 µg/m3." However, further in that paragraph, the Report states, "The average and maximum detected TCE concentrations in Unit 1045 were 0.0006384 µg/m3 and 0.3868 µg/m3, respectively. Unit 1050 had an average detected TCE concentration of 0.0000 µg/m3 and a maximum of 0.0000 µg/m3." If the MDL was 0.6 µg/m3, it would not have been possible to accurately measure concentrations below that concentration. Section 6.0 of Attachment A-2 of the Report indicates that a Reporting Limit (RL) of 0.6 µg/m3 was achieved for the CWC testing program. Please clarify what MDL and RL were achieved during continuous monitoring.

Gas Chromatograph Quality Control Analysis

Section 10.0 of Attachment A-2 of the Report describes the procedures for daily analysis of continuing calibration verification (CCV) samples, but the results for CCV samples were not provided in Table 3. Please provide the results for all CCV samples analyzed.

Page 8 of the Report indicates that a multipoint calibration was performed on December 16, 2024, prior to the fourth round of commissioning, on December 20, 2024, prior to the continuous monitoring of Units 1045 and 1050, and again on January 6, 2025, prior to analysis of blower exhaust samples. Section 11.0 of Attachment A-2 of the Report explains that three concentration levels were used to generate the calibration curves, 0.5 part per billion by volume (ppbv), 1.0 ppbv, and 2.0 ppbv. The calibration curves are provided graphically and in table form as Attachment A-3. Please explain what the analytical results in Attachment A-3 represent and why they differ from the concentration of the standard. For example, for the 2.0 ppbv standard analyzed on 12/16/2024, on attachment A-3, the result is reported as 1.8347 ppbv.

Passive Samplers Deployment and Retrieval Log

On February 5, 2025, an updated Attachment B was provided, which included the "Local Air Flow Rate" measured prior to fan deployment. These results are provided in centimeters per second (cm/s). The air flow measured during sampling is provided in feet per minute (fpm). Please provide a revised Attachment B that portrays these results using consistent units, preferably cm/s.

Central Courtyard Tunnel

CWC's *Response to WDNR Review of Site Investigation Report*, dated March 1, 2022, indicates that the tunnel beneath the central courtyard has been sealed from the south end and was proposed to be used for maintenance supplies to be accessed from the northern end of the tunnel, which opens to the ventilated underground parking garage. During the DNR's site visit on February 4, 2025, K. Singh staff was not aware of the status or location of this tunnel. The March 1, 2022, report indicates that indoor air sampling in this tunnel would occur as a part of the commissioning process. Clarify whether this tunnel is still accessible from its northern end, what it is or will be used for, and whether any indoor air data was collected from this tunnel during commissioning. Provide the indoor air data from this tunnel if it is available. If it is not available and if the tunnel is accessible and will be used by CWC staff, then collect an indoor air sample from the

tunnel to confirm that the indoor air is below the vapor action levels (VALs). You may choose to first screen the location using the portable GC unit on-site to help determine if any additional sampling is necessary in this location.

Northern Mechanical Room

The *Indoor Air Quality Test Results for December 4 – December 13, 2024*, submitted to the DNR on January 3, 2025, indicates that sealing efforts were performed in the Northern Mechanical Room after GC indoor air data identified vapor action level exceedances for TCE on December 12, 2024. Follow-up indoor air sampling at this location using the GC unit and passive samplers did not identify any VAL exceedances. Provide additional information on the sealing efforts that were taken in this room and a timeline for when the sump in this room will be permanently sealed.

The above-requested information can be submitted to the DNR via email or as a standalone submittal to the DNR's RR electronic submittal portal. Please do not hesitate to reach out with any questions you might have. Thank you for your continued work on this project.

Best, Jane

Jane Gray
she/her/hers
Hydrogeologist Program Coordinator – West Central Region
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
Phone: (414) 435-8021
jane.gray@wisconsin.gov


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