

Gray, Jane K - DNR

From: Gray, Jane K - DNR
Sent: Wednesday, March 12, 2025 5:12 PM
To: Pratap Singh
Cc: Shane LaFave; Que El-Amin; Angy Singh; Mylotta, Pamela A - DNR; Nobile, Trevor W - DNR
Subject: CWC East Block (02-41-263675) - Documentation Revisions Requested
Attachments: Figure_2_2025_RADR.pdf

Greetings Dr. Singh – Thank you for taking the time to speak with me this afternoon regarding the subject site. As we discussed, the DNR has reviewed the *Interim Remedial Action Documentation Report* (RADR), submitted on 02/11/25, and *Operation, Maintenance, and Monitoring Manual* (OM&M Plan), submitted 02/26/25, and has determined that the following revisions and clarifications are required for the reports. Therefore, please prepare and submit updated reports that capture the requests provided below:

- VMS coverage:
 - The DNR understands that the VMS covers the entire building complex, excluding Building 1A, Building 1B (boiler), Building 1E (including Building 1D and Addition 1), Addition 6, and the underground tunnel beneath the central courtyard (see attached Figure 2). The DNR understands that these buildings are unoccupied, vacant, and inaccessible. Further, the DNR understands that these buildings are not accessed by CWC staff, other than semi-annual inspections of the sprinkler system in Building 1B (boiler), which take less than 30 minutes to inspect. Update Section 2 of the OM&M Plan and Section 3.2 of the RADR to call out these buildings and specify their status (e.g., vacant, unoccupied, secured/locked) and their accessibility (to residents and staff). If there are any other buildings within the complex of similar status, include these in this discussion. Specify the access to these buildings and that they will remain locked at all times. Update these sections of the report to indicate that the DNR will be notified and a plan for DNR review and approval will be submitted to the DNR prior to changing the use of these buildings, which will be required as a part of the vapor-related continuing obligations that will be imposed as a part of the DNR's construction and commissioning approval letter.
 - Include inspection of the entrances of these buildings in Form 4400-321 (VMS inspection log) to ensure they are secured/locked.
- Stormwater control features:
 - All of the sumps installed as a part of the VMS must be properly sealed to eliminate any preferential pathways for vapor intrusion, including the sump in the northern mechanical room. The DNR understands that there are methods of sealing sumps that still allow a facility to access the sump when necessary. Update the RADR and OM&M Plan to provide an updated narrative of the sump sealing efforts, label each of the sumps on applicable figure(s), and include updated photo documentation of each of the sealed sumps with the sump labels noted in the photo description. Additionally, update the OM&M Plan to include discussion of sealed sump inspection in Section 3.4 of the report and also update Form 4400-321 of the OM&M to indicate all sealed sumps will be inspected.
 - Include a copy of any discharge permits associated with the sumps on site in the RADR and in the OM&M Plan.
 - The VMS includes access points where the VMS piping can be inspected, as detailed on Figure 4 of the OM&M Plan. Update the RADR and OM&M Plan to include discussion on how these points are accessed and whether they are locked. Update the applicable figures in the RADR and OM&M Plan to state on the legend that these access points are specifically for the VMS piping. Update the RADR and OM&M Plan to include photos of the access points and include the corresponding access point # in the photo description. Update the OM&M Plan to include inspection of each of the access points in the narrative and in Form 4400-321.

- Telemetry system:
 - o Update Section 5.2 of the OM&M Plan to specify the format that the telemetry data will be submitted. Specifically, the DNR requests that the data be submitted as daily data average graphs, as opposed to all raw data over a given period of time, with a narrative summarizing alarm events and what response actions occurred when the alarm events may have occurred.
 - o In the RADR, provide a description of the telemetry insulation and a photo documenting what this looks like.
- Building sealing features: Update Form 4400-321 to include inspection of the walls in Building 1B-W (and any other applicable areas) that were sealed with vapor barriers are drywalls, similar to the inspection of the sealed columns.
- VMS piping and blower components: Update the applicable figures in the OM&M Plan and the RADR to clearly label the locations where the sub-surface VMS piping penetrates the building slab to connect to the above-surface piping runs on the applicable figure. Additionally, include photos documentation each of these locations in the photos log and update Form 4400-321 to include inspection of these penetration locations. Label/number these penetrations to allow for easier inspection/documentation.
- OM&M schedule:
 - o Section 3.10 of the OM&M Plan indicates that decommissioning of the VMS will be considered if TCE blower emissions drop below its VAL. Update this section of the report to indicate that the DNR will be notified and a plan for DNR review and approval will be submitted to the DNR prior to undertaking any decommissioning actions, including turning off the VMS. This requirement and a continuing obligation will be established in the DNR's forthcoming VMS construction and commissioning approval letter and should be captured in the OM&M Plan.
 - o 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 OM&M Plan provides a 5-year operation, maintenance, and monitoring schedule of the VMS through 2029. 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. As requested in DNR's 01/21/25 review letter, update Section 3.1 of the OM&M Plan (OM&M Overview) to 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.
- VMS commissioning data:
 - o One of the goals of the RADR is to include comprehensive VMS commissioning information. Update the RADR to include the commissioning data collected for each of the commissioning events (including the first commissioning event in February 2023). This should include the applicable figures showing indoor air and pressure field extension sampling/measurement locations for each commissioning event.
 - o Update Section 3.4 of the RADR to include a summary of the first commissioning event.
 - o All GC indoor air data collected from March 2023 to March 2025, collected outside of official commissioning events, should be tabulated and included in its own attachment/appendix. The GC data collected during commissioning events will be included in the commissioning data tables requested above.
- Other documentation:
 - o Additional information and updated documentation for the VMS was provided to the DNR on 03/06/25. Update the RADR and OM&M Plan to include this updated information and documentation.
 - o Include the sub-slab vapor contamination figure (pre-commissioning) alongside the already included soil and groundwater figures.
- Fees: Similar to CWC West Best (02-41-587376), upon approval of the vapor mitigation system (VMS) and its commissioning process, the DNR will establish interim action continuing obligations for maintaining and operating the VMS. Please submit a \$350 vapor database fee to support this process. Additionally, the \$700 technical assistance fee presented with the RADR is being applied to the DNR's review of the VMS commissioning and construction documentation portion of the report. An additional \$350 technical assistance fee is required for DNR review of the RADR portion of the report, in accordance with Wis. Admin. Code ch. 749.

- RR electronic submittal portal: Please note that the PDF file size limit is 250 MB. Therefore, similar to your previous RADR submittal, the documentation should be submitted as separate documents/"parts" to ensure it does not exceed the file limit. Additional information on submitting documents to the RR electronic submittal portal can be found here: <https://dnr.wisconsin.gov/topic/Brownfields/Submittal.html>.

The DNR appreciates the efforts you have and continue to take to help to remove the contamination at the site and to restore the indoor air quality within the site building. The VMS commissioning documentation efforts are close to being finalized. We look forward to continuing to work with you to ensure all necessary documentation is submitted so DNR can approve the documentation as being complete and lift the DNR's March 2023 Emergency Order. Please do not hesitate to reach out if any questions come up as you work to address the requests presented in this email. Please note that I will be out of work status and unavailable from Friday 03/14 to Friday 03/21. Should you have any questions in my absence, you may contact my Supervisor for this project, Pamela Mylotta, at (414) 374-2423 or at Pamela.Mylotta@wisconsin.gov.

Thank you, Jane

Jane Gray

she/her/hers

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