



April 6, 2021

BEN CLAPP
SKADDEN ARPS SLATE MEAGHER & FLOM LLP
1440 NEW YORK AVE NW
WASHINGTON DC 20005

Subject: Vapor Intrusion – Short Term Risks for Trichloroethylene Vapors, Vapor Intrusion Pathway Assessment, and Immediate and Interim Actions
MILWAUKEE DIE CASTING CO INC
4132 N HOLTON ST, MILWAUKEE, WI
BRRTS# 02-41-000023 FID# 241228240

Dear Sir or Madam:

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The purpose of this letter is to communicate three points related to vapor intrusion:

- 1. TCE poses short-term risks to human health that justify accelerated assessment, investigation and mitigation of the vapor intrusion pathway.**
2. Assessment of the vapor intrusion pathway is part of the investigation process and should be assessed as early as possible and routinely re-assessed throughout the life of a project.
3. Immediate and interim actions may be necessary early in the site investigation process to protect human health from contaminated vapors.

We encourage you to discuss this information with your environmental consultant. The DNR believes the health risks of TCE vapors are serious enough that it should be one of *the first things* evaluated as part of a site investigation, especially at sites where contamination may impact sensitive populations. RPs should be diligent about screening for TCE in vapors as early in the site investigation process as possible, to determine if immediate actions are warranted to reduce harmful exposure.

Unfortunately, many RPs and consultants wait until late in the site investigation process, or even at case closure, before taking steps to assess the presence of vapors and any needed mitigation efforts. We are encouraging you to do this as one of the first steps in your site investigation.

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Authority – Assessments and Interim and Immediate Actions

Assessment of the vapor intrusion pathway is a critical part of an environmental investigation. Wisconsin Administrative Code (Wis. Admin. Code) Chapter NR 716 outlines the requirements for investigation of contamination in the environment. Specifically, Wis. Admin. Code § NR 716.11(3)(a) requires the field investigation “determine the nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in **all** affected media,” which includes sub-surface and indoor air. In addition, Wis. Admin. Code § NR 716.11(5) specifies that the field investigation include an evaluation of the “potential pathways for migration of the contamination, including drainage improvements, utility corridors, bedrock and permeable material or soil along which **vapors**, free product or contaminated water may flow.”

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STEVE MUELLER
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Sincerely,



Christine Haag
Program Director
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Copy to Consultant(s) on Record



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CHRISTOPHER CLARK
PHARMACIA LLC
235 E 42ND ST 219/05/01
NEW YORK NY 10017

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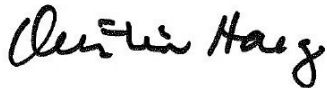
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FISHER CONTROLS INTERNATIONAL INC
205 S CENTER ST
MARSHALLTOWN IA 50158

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THOMAS ESPER
SLYMAN INDUSTRIES INC
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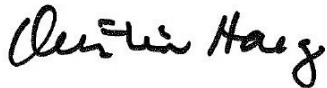
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