

## Schultz, Josie M - DNR

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**From:** Borski, Jennifer - DNR  
**Sent:** Monday, October 14, 2019 2:49 PM  
**To:** Schultz, Josie M - DNR  
**Cc:** Beggs, Tauren R - DNR  
**Subject:** RE: 1404 N Webster Ave, Alloquez, BRRTS #02-05-514372

There are potential acute health concerns at these residences immediately adjacent to the CVOC source to consider as you move forward with this case. Perhaps WAM funds could be used to investigate this source property now that former dry cleaners are eligible for WAM funds. Were the common dry cleaner source areas investigated for CVOCs in soil yet (beneath DC machine, floor drains, back door, dumpster location, sewer laterals, etc.)? Discuss with Roxanne & Tauren (LRT).

Remember structures within 100' of CVOCs in soil or above groundwater where CVOCs > ES need to be investigated for VI.



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Jennifer Borski

Phone: (920) 424-7887

[Jennifer.borski@wisconsin.gov](mailto:Jennifer.borski@wisconsin.gov)

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**From:** Borski, Jennifer - DNR  
**Sent:** Monday, October 14, 2019 2:38 PM  
**To:** Schultz, Josie M - DNR <[josie.schultz@wisconsin.gov](mailto:josie.schultz@wisconsin.gov)>  
**Cc:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Subject:** 1404 N Webster Ave, Alloquez, BRRTS #02-05-514372

Josie,

Thank you for discussing this chlorinated volatile organic compounds (CVOCs) site with me this afternoon. Based on the current groundwater data indicating an undefined CVOC plume that includes trichloroethylene (TCE), flow direction being toward the location where a new day care building will be built (currently vacant parcel) and the short time frame for this construction, we discussed the following concerns and recommendations:

- Day cares are defined as a “residential setting” in s. NR 700.03(49g), Wis. Admin. Code and residential vapor action levels (VAL) and vapor risk screening levels (VRSL) will apply.
- The current extent of the CVOC plume in groundwater is not identified beneath the proposed footprint but the plume is undefined and the building is within the flow path of the CVOC plume. To be protective, DNR *recommends* the building be constructed and evaluated as recommended in RR-800, Section 5.3 (Future Development) and 7.5 (Mitigation in New Construction):
  - Include design & installation of an active vapor mitigation system (VMS) at construction, including sub-slab vapor ports (at least 4 based on the 5,500 sq. ft. footprint) but do not activate the VMS;
  - Collect paired sub-slab vapor and indoor air (and outdoor air) samples approximately one month after construction (recommend after the building HVAC system is operational);
  - Analyze for CVOCs only (PCE, TCE, cis-1,2-DCE and VC);
  - At least three paired events, one within the heating season, should be collected prior to ruling out the need for the VMS;
  - If CVOCs are detected above the VAL or VRSL, additional assessment is no longer needed and the VMS should be activated and commissioned (see RR-800, Section 9);
  - If the VMS is found to be necessary, documentation required under chs. NR 708 and 724, Wis. Admin. Code will be needed (see RR-800, Section 10 & 11) and possibly assigned as a continuing obligation as allowed in Code; and
  - If the VMS is found not to be necessary, operation of the VMS will be voluntary (e.g., not a required continuing obligation).
- In addition, we recommend Dranjer® plugs/drains be considered for all plumbing within the new building as an added protective measure against conduit-based vapor migration (in-pipe) since the CVOC site investigation is not complete.
- If vapor ports and a VMS are not proactively installed during construction, a vapor investigation will be required post-construction if the screening criteria indicates potential for migration of vapors to an occupied space per s. NR 716.11(5)(g), Wis. Admin. Code. A VMS may be required to be installed post construction depending on the vapor investigation.

Let me know if you have additional questions or concerns.

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Jennifer Borski

Vapor Intrusion Team Leader / Hydrogeologist

Remediation & Redevelopment Program / Environmental Management Division  
Wisconsin Department of Natural Resources  
625 E. County Road Y, STE 700  
Oshkosh, WI 54901-9731  
Phone: (920) 424-7887  
Cell Phone: (920) 360-0853  
[jennifer.borski@wisconsin.gov](mailto:jennifer.borski@wisconsin.gov)

