

**From:** Borski, Jennifer - DNR  
**Sent:** Tuesday, August 24, 2021 9:54 AM  
**To:** McKnight, Kevin - DNR  
**Cc:** Hedman, Curtis J - DHS; Kloczko, Nathan F - DHS; Schultz, Josie M - DNR  
**Subject:** VI Discussion/DHS Consult follow-up for Mirro Plt #20 (Former), BRRTS #02-08-520157

Kevin,

Thank you for discussing this site with us this morning. We specifically reviewed the August 2021 sub-slab vapor (SSV) data from beneath the slab-on-grade machine shop and indoor air data from within the basement collected at this site.

The sampling was a second step in assessing potential risk to current occupants of the building following sealed sump data that identified PCE & TCE present at more than three times the commercial vapor action level (VAL) and trans-1,2-DCE above the new commercial VAL. The consultant has since identified demographics at the property include women of child-bearing years, which is a concern for exposure to TCE. We understand the limited SSV investigation was based on equipment on hand by the consultant and was accompanied by a chemical inventory of use by the machine shop to identify potential interferences for a future indoor air investigation. The results of the chemical inventory have not yet been reported. We also understand the basement is not currently occupied and the first floor above the basement is used for warehousing with occasional worker use.

After discussion of the demographics, building layout and initial SSV and basement indoor air data, DNR and DHS suggest the following next steps:

- Sample SSV at all six ports in the machine shop during cold weather (ideally 20°F or less). If the chemical inventory reveals no CVOC interferences, SSV sampling should be paired with indoor air sampling. A subsequent event may be needed dependent upon results.
- Propose and carry out a routine indoor air sampling schedule of at least two times per year (winter/summer) to monitor the basement indoor air until:
  1. the vapor migration pathway from the sumps can be interrupted (e.g., sump sealed & vented);
  2. the property owner is willing to accept a limitation on occupancy and use (e.g., no occupancy in the basement and limit first floor use to warehousing); or
  3. the groundwater is remediated and a sealed sump sample no longer exhibits exceedances of the VALs.

We did not discuss whether additional soil, groundwater or vapor investigation is needed beyond what we discussed to meet the requirements of Wis. Admin. Code ch. NR 716. Note that a SIWP will need to be submitted for the work suggested above to include sampling locations, collection and analytical methods.

You can work directly with Curtis and Josie moving forward. Let us know if you have any further questions or need additional assistance.

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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 – *Currently teleworking*  
**Cell Phone: (920) 360-0853**  
[jennifer.borski@wisconsin.gov](mailto:jennifer.borski@wisconsin.gov)

