

From: Jeanne Tarvin <jtarvin@ramboll.com>
Sent: Tuesday, September 14, 2021 9:15 AM
To: McKnight, Kevin - DNR
Cc: Tom Nordgren; Hudson Green; Jones, Kristin; Paul Lindquist; Susan Petrofske
Subject: VI Sample Results - Former Mirro #20 Chilton (BRRTS 02-08-520157)

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Kevin,

Thank you for taking the time to speak with us on August 27, 2021 regarding WDNR's request for additional vapor intrusion (VI) investigation. As we discussed, it remains NOC's position that the CVOC impacts detected in Site groundwater, sump water and indoor air are not related to NOC's historic operations at the site. With that being said, NOC also understands the importance of gathering vapor intrusion data during the winter months. Consequently, subject to any developments that arise concerning an application for the off-site liability exemption related to the source material of the vapor, NOC plans to perform the following sampling this winter:

Winter (targeting temps less than 20°F)

- Collect sub-slab vapor samples from the four sub-slab vapor points installed within the machine shop portion of the site during the August 6, 2021 sampling event. Please note that based on the August 2021 vapor and groundwater sampling results, we are not planning on the installation of the two tentative sub-slab points referenced previously.
- Collect indoor air samples (8-hours) from the three locations previously sampled in the basement during the August 2021 sampling event.
- Collect one concurrent outdoor air sample (8-hr).
- Submit the sub-slab and indoor air samples for CVOCs. We are proposing to exclude analysis for PVOCS during this round of testing based on the chemicals used at the site by the current tenants.

The results of this phase of testing will be provided to the WDNR and property owner within 48 to 72 hours of receipt of data.

Thank you again for taking the time to discuss our concerns and approach.

Regards, Jeanne

Jeanne Tarvin, PG, CPG
Principal
D +1 (262) 901-0085
M +1 (414) 326-5365
jt tarvin@ramboll.com

From: McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov>
Sent: Tuesday, August 24, 2021 11:13 AM
To: Jeanne Tarvin <itarvin@ramboll.com>
Cc: Tom Nordgren <tom.nordgren@ki.com>; Susan Petrofske <SPETROFSKE@ramboll.com>; Paul Lindquist <PLINDQUIST@ramboll.com>; Hudson Green <hgreen@patriotenviro.com>; Jones, Kristin <Kristin.Jones@newellco.com>
Subject: VI Sample Results - Former Mirro #20 Chilton 02-08-520157

Jeanne,

DHS and DNR reviewed the VI sample results you submitted on August 13th and has the following recommendations:

Machine Shop:

- 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 interferents, SSV sampling should be paired with indoor air sampling. A subsequent event may be needed dependent upon results.

Basement portion of building:

- 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.

Please contact me to discuss.

Kevin

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Kevin D. McKnight

Hydrogeologist - Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

Oshkosh Service Center

625 E CTY Y, Suite 700

Oshkosh WI 54901

Phone: 920-808-0170 (This is the number you should use to contact me from this point forward)

Kevin.McKnight@wisconsin.gov

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