

**From:** Beggs, Tauren R - DNR  
**Sent:** Monday, December 13, 2021 9:14 AM  
**To:** Hedman, Curtis J - DHS  
**Cc:** Borski, Jennifer - DNR; Schultz, Josie M - DNR; Kloczko, Nathan F - DHS  
**Subject:** RE: Please Review: Interim Action Documentation Report and OMM Plan for Jagemann Plating Co Inc, BRRTS # 02-36-555544

Thanks for the quick response back Curtis.

Have a nice holiday break if I don't talk to you again before then.

Regards,

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**Tauren R. Beggs**

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**From:** Hedman, Curtis J - DHS <[Curtis.Hedman@dhs.wisconsin.gov](mailto:Curtis.Hedman@dhs.wisconsin.gov)>  
**Sent:** Friday, December 10, 2021 4:58 PM  
**To:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>; Kloczko, Nathan F - DHS <[nathan.kloczko@dhs.wisconsin.gov](mailto:nathan.kloczko@dhs.wisconsin.gov)>  
**Cc:** Borski, Jennifer - DNR <[Jennifer.Borski@wisconsin.gov](mailto:Jennifer.Borski@wisconsin.gov)>; Schultz, Josie M - DNR <[josie.schultz@wisconsin.gov](mailto:josie.schultz@wisconsin.gov)>  
**Subject:** RE: Please Review: Interim Action Documentation Report and OMM Plan for Jagemann Plating Co Inc, BRRTS # 02-36-555544

Good Afternoon All -

Glad to see this follow up sampling plan moving forward. The SSV and IA sampling scheme looks acceptable to me. I thought Jenna might have originally suggested 14 day passive monitoring, but a 5 day deployment should be OK to assess potential for variable indoor air concentrations over multiple days. It's also good that they will coordinate future sampling plans with DNR, as any TCE detections observed in these IA samples may indicate a need for more frequent than annual follow up sampling events in the future.

Curtis

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**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Sent:** Thursday, December 9, 2021 1:47 PM  
**To:** Kloczko, Nathan F - DHS <[nathan.kloczko@dhs.wisconsin.gov](mailto:nathan.kloczko@dhs.wisconsin.gov)>; Hedman, Curtis J - DHS <[Curtis.Hedman@dhs.wisconsin.gov](mailto:Curtis.Hedman@dhs.wisconsin.gov)>  
**Cc:** Borski, Jennifer - DNR <[Jennifer.Borski@wisconsin.gov](mailto:Jennifer.Borski@wisconsin.gov)>; Schultz, Josie M - DNR <[josie.schultz@wisconsin.gov](mailto:josie.schultz@wisconsin.gov)>  
**Subject:** RE: Please Review: Interim Action Documentation Report and OMM Plan for Jagemann Plating Co Inc, BRRTS # 02-36-555544  
**Importance:** High

Good afternoon Nathan and Curtis,

Josie and Jennifer will be providing feedback they have on this soon. Did you have any feedback on this report to relay back to Enviroforensics? Enviroforensics indicated they plan to do the vapor and indoor air sampling sometime in December so if there are any comments on that I need them soon. They potentially may have already completed the sampling as I didn't get a specific timeframe for when they planned to sample in December.

Thanks,

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**From:** Beggs, Tauren R - DNR  
**Sent:** Wednesday, November 17, 2021 9:35 AM  
**To:** Borski, Jennifer - DNR <[Jennifer.Borski@wisconsin.gov](mailto:Jennifer.Borski@wisconsin.gov)>; Schultz, Josie M - DNR <[josie.schultz@wisconsin.gov](mailto:josie.schultz@wisconsin.gov)>; Kloczko, Nathan F - DHS <[nathan.kloczko@dhs.wisconsin.gov](mailto:nathan.kloczko@dhs.wisconsin.gov)>; Hedman, Curtis J - DHS <[Curtis.Hedman@dhs.wisconsin.gov](mailto:Curtis.Hedman@dhs.wisconsin.gov)>  
**Subject:** Please Review: Interim Action Documentation Report and OMM Plan for Jagemann Plating Co Inc, BRRTS # 02-36-555544

Good morning,

Attached is the Interim Action Documentation Report and Operation, Maintenance, & Monitoring Plan (no fee) received from Enviroforensics. Please take a look and let me know if you have comments that you want me to relay back to Enviroforensics.

The plan for vapor mitigation is to continue to utilize the sub-slab depressurization system installed in the office in 2015 and the existing Plating and Warehouse Mechanical System (consisting of air scrubbers, exhaust fans, and make up air units).

#### **Summary and References for the Report:**

- Vapor Sampling Plan: (See Section 4.3.2 of report and Figure 1)
  - Sampling is proposed for December 2021 and February 2022, with additional ongoing monitoring to be evaluated and coordinated with DNR after these sampling events.
  - Four locations in December 2021 for indoor air sampling in the office (Summa 8-hr, Passive 8-hr, and Passive 5-day) and SSDS effluent Summa Grab.
    - One new indoor air location, see Figure 2.
  - Eight Locations in December 2021 in the Plant for paired indoor air sampling (Summa 8-hr, Passive 8-hr, and Passive 5-day) and sub-slab sampling (Summa SSV).
    - Three new paired sampling locations, see Figure 2.
    - A second event for the three new sampling locations for indoor air only in February 2022 (Summa 8-hr, Passive 8-hr, and Passive 5-day)
- Office:
  - System Design and Construction, see Sections 3.1 and 3.2, Figure 2, Appendix B, and Appendix C
  - System Operation, Maintenance, and Monitoring: see Sections 4.1, 4.3.1., 4.4, and 4.5, and Appendix D
- Plating and Warehouse:
  - System Design and Construction, see Section 3.2
  - System Operation, Maintenance, and Monitoring: see Sections 4.2, 4.3.1, 4.4, and 4.5, and Appendix D.

If you have any questions, please feel free to contact me.

Thanks,

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**From:** Borski, Jennifer - DNR <[Jennifer.Borski@wisconsin.gov](mailto:Jennifer.Borski@wisconsin.gov)>

**Sent:** Thursday, September 16, 2021 10:42 AM

**To:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>; Schultz, Josie M - DNR <[josie.schultz@wisconsin.gov](mailto:josie.schultz@wisconsin.gov)>; Kloczko, Nathan F - DHS <[nathan.kloczko@dhs.wisconsin.gov](mailto:nathan.kloczko@dhs.wisconsin.gov)>; Hedman, Curtis J - DHS <[Curtis.Hedman@dhs.wisconsin.gov](mailto:Curtis.Hedman@dhs.wisconsin.gov)>

**Subject:** RE: Interim Action Planning Update for Jagemann Plating Co Inc, BRRTS # 02-36-555544

Tauren,

Thanks for this info and good news to hear this site has engaged specialists on the issue. When we spoke in July about the 31,700,000 ug/m<sup>3</sup> TCE beneath the plating process floor in July (greater than 10E-04 risk), DHS recommended continued routine indoor air monitoring until an interim action is designed & implemented along with education of the workers on health risks from TCE. While I am in support of EnviroForensics' prioritization of this site, they are talking about another month or more before modifications can be made (Oct/Nov). My interpretation of ch. NR 708 is that the RP still needs to be evaluating the potential for acute exposure (i.e., "...hazardous substance discharges that pose an imminent threat...") and more immediate action during the process for evaluation, design & implementation of an interim action. That being said, I defer to DHS regarding concern for potential exposure to workers during the proposed time frame.

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**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Sent:** Wednesday, September 15, 2021 3:55 PM  
**To:** Schultz, Josie M - DNR <[josie.schultz@wisconsin.gov](mailto:josie.schultz@wisconsin.gov)>; Borski, Jennifer - DNR <[Jennifer.Borski@wisconsin.gov](mailto:Jennifer.Borski@wisconsin.gov)>; Kloczko, Nathan F - DHS <[nathan.kloczko@dhs.wisconsin.gov](mailto:nathan.kloczko@dhs.wisconsin.gov)>; Hedman, Curtis J - DHS <[Curtis.Hedman@dhs.wisconsin.gov](mailto:Curtis.Hedman@dhs.wisconsin.gov)>  
**Subject:** Interim Action Planning Update for Jagemann Plating Co Inc, BRRTS # 02-36-555544

Good afternoon,

Since our call on August 4, 2021, Nicole LaPlant from Robert E Lee has been working with the responsible party Mike Jagemann and with Rob Hoverman from Enviroforensics on the interim action and air monitoring planning. I had a call today with Nicole and Rob. Rob indicated the plan would be to look at the existing HVAC system as he doesn't think it is very feasible to do sub-slab in this scenario, so Enviroforensics will get contracted to do the interim action and air monitoring. Nicole and Rob have already provided a list of items that the RP has been working on to inventory air exchange systems, documenting worker's schedules, where they work in the building, and other logistics for the interim action planning. Enviroforensics would schedule a site visit with a HVAC engineer within 2 weeks to evaluate the current system, determine what modifications may be needed, target specific areas for sampling, etc. They would then put together a plan that would include the documentation needed for the HVAC system to be used as the vapor mitigation system for the building and that plan would also include the proposed air monitoring. Rob indicated it will likely be a combination of traditional summa canister

sampling and passive sampling. Enviroforensics has recently been working more with a company named Beacon because they like their sampling approach and equipment.

I indicated to Nicole and Rob that I would be following up with the DNR vapor staff and DHS to see if there were any concerns from your perspective or if there was anything more we wanted in the near term (documentation, sampling, etc.). Rob said they could do a sampling event and provide data with the plan if needed, but he thought the turnaround time for the HVAC scenario would be short relative to a more typical scenario of a design and implementation of a sub-slab vapor system which would take significantly longer, so an air monitoring plan in that scenario would be more important to submit on a more immediate timeframe. Therefore, Enviroforensics is proposing to submit the interim action plan and air monitoring plan simultaneously as one document.

Please let me know if you have any comments or concerns.

Regards,

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**Tauren R. Beggs**

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