

**From:** Beggs, Tauren R - DNR  
**Sent:** Wednesday, May 18, 2022 2:32 PM  
**To:** Rob Hoverman  
**Cc:** 'nlaplant@releeinc.com'; Schultz, Josie M - DNR  
**Subject:** Vapor Investigation and Monitoring Comments for Jagemann Plating Co Inc, BRRTS # 02-36-55544

Hi Rob,

As the final follow up to our previous calls for the vapor aspects of this case, I have since followed up with Josie Schultz and Jennifer Borski, so wanted to get these comments out to you in a final written format.

Based on the data provided, the vapor investigation is not complete. Additional vapor sampling will be needed to define degree and extent under Wis. Admin. Code ch. NR 716. The design and construction of the building additions on-site should be considered during the evaluation of selecting the additional vapor sampling locations. Sub-slab vapor sampling can either be passive or grab sampling. Indoor air can be passive longer-duration sampling.

While continued investigation in accordance with Wis. Admin. Code § NR 716.05(3)(a) described above and evaluation of remedial action options, selection & remedial design takes place in accordance with Wis. Admin. Code chs. NR 722 and 724, monitoring of the indoor air space needs to continue along with recommending paired sub-slab vapor sampling to assist in data and risk evaluation to assure protection of public health while continuing to evaluate the effectiveness of the selected interim action (HVAC modification) under Wis. Admin. code § NR 708.11. Please consider the following comments:

1. Indoor air monitoring can now consist of passive longer-duration sampling in lieu of 8-hr Summa or passive sampling.
2. Recommended sub-slab vapor sampling can be either passive or grab sampling.
3. Future monitoring events should be collected at periods of anticipated disruption of sub-slab vapors such as a rising water table (possibly spring), initiation of cooling (e.g., early summer) and during the heating season (e.g., November/December).
4. Vapor sampling should continue at historical sampling locations for at least the next event.
5. If you wish to reduce the number of locations during subsequent vapor sampling events, submit a request for DNR review including all historical vapor data along with the proposed air monitoring network.

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

Regards,

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**Tauren R. Beggs**

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