

**From:** Beggs, Tauren R - DNR  
**To:** "John Emery"; Don Brittnacher (Don.Brittnacher@omni.com)  
**Cc:** Streiffer, Adam B - DHS; Kinnard, Cindy; Sellwood, Alyssa A - DNR; Borski, Jennifer - DNR  
**Subject:** RE: Follow up from Call Earlier Today for Vapor at Allyn property, Algoma  
**Date:** Thursday, December 15, 2016 4:03:00 PM

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Good afternoon,

Thanks for participating in the call this morning. I have followed up with Adam Streiffer (DHS), Jennifer Borski (Regional Vapor Intrusion contact) and Alyssa Sellwood (State Vapor Intrusion contact).

Actions Needed Based on Priority of Vapor Concerns:

- 1) Determining the demographics of residents at the apartment complex and vapor sampling at the apartment complex as soon as possible to determine if there are immediate health risks. This should be initiated by the responsible party with assistance from the health department. The local health department (main contact is Cindy Kinnard) has been notified by Adam. The local and/or state health departments can assist with this.
  - In regard to Don's question about sub-slab and indoor air. Sub-slab sampling is used to determine if vapor mitigation is needed for a building and indoor air sampling determines the urgency of the action that needs to be taken to address the vapor issue. Sub-slab is needed for full assessment of the apartment complex. Per follow up discussion with DNR vapor staff, a full assessment of the multi-family apartment complex needs to include two sub-slab vapor sampling points with concurrent indoor air samples (one at the north end and one at the south end of the apartment building). This is due to potential variability in the sub-surface and that the full extent of contamination off-site is currently unknown.
  - At a minimum, at least one sub-slab vapor point with a concurrent indoor air sample needs to be collected at the area closest to the contamination that has migrated from the source property (north end of the apartment building). Another indoor air sample should be collected on the south end of the building as well.
- 2) Getting the vapor mitigation system installed at the source property building should be completed as soon as possible.
  - This is the link to the list of radon contractors available on the Department of Health website: <https://www.dhs.wisconsin.gov/radon/radon-proficiency.htm>. This is where to start looking for vapor intrusion (VI) contractors. To determine if they have experience with vapor mitigation systems like what should be installed at this site, ask if: they have experience installing systems to mitigate chemical vapors, include in their scope of work to do pressure field extension testing to ensure the system is depressurizing the whole building, and will provide documentation (photos, pressure field extension data, etc.) detailing what was completed.
- 3) Indoor air sampling to show that there is no longer an indoor air exceedance at the source property.
  - Short-term ventilation of the building as previously recommended in email correspondence by Adam should be done in the interim to temporarily ventilate the building.

- After the mitigation system has been operating for a couple months, an indoor air sample needs to be collected on the first floor to show indoor air is no longer exceeding the vapor action level.

If there are questions or further assistance is needed, please feel free to contact me at my phone number below. Previous email correspondence is provided below.

Thanks,

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**Tauren R. Beggs**

Phone: (920) 662-5178

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**From:** Beggs, Tauren R - DNR

**Sent:** Thursday, December 15, 2016 1:03 PM

**To:** Sellwood, Alyssa A - DNR

**Cc:** Streiffer, Adam B - DHS; Borski, Jennifer - DNR

**Subject:** RE: Call Summaries and Follow up for Vapor at Allyn property, Algoma

Hi Alyssa,

I had a follow up call this morning with Adam Streiffer – DHS, Don Brittnacher – OMNNI, John Emery (c/o of RP), and myself. I also had a follow up call with Jennifer. Below are my summaries of the calls. I plan to call you this afternoon today yet to go over this information with you, but wanted to get everything down in writing.

[10:00 - 10:30am call with Adam Streiffer - DHS, Don Brittnacher - OMNNI, John Emery c/o of RP, and Tauren Beggs - DNR](#)

First discussed installing a mitigation system or permanently relocating tenants. Decision is to look at installing a vapor mitigation system along with sealing the floor where cracks, etc. are present and having a pressure field extension test being completed to ensure the mitigation system is working effectively. Mitigation system could help mitigate vapors from migrating to the surrounding properties, but the surrounding properties do need to be assessed as well. Since the subsurface is a porous media (sand and gravel), vapors will tend to migrate easier within the subsurface, but are less likely to follow preferential pathways such as utilities.

Talked about if vapors could be coming from potentially saturated building materials or if it is truly coming from sub-slab. Emery stated that the perc unit was only used for approximately one year before the Allyns decided to convert their operations to stoddard; however, a spill did occur in the perc room within that limited timeframe (spill occurred approximately 50 years ago).

In regard to the setup of the first and second floor, the 1st floor living space is on the south end of the building and the second floor apartments are directly above the first floor living space. The

Allyn's no longer live on the first floor and it is unlikely a new tenant will be in there for likely a year or more. The two second floor apartments are still being used, one by a male bachelor in his 80s and one by a male bachelor in his 40s. The perc and Stoddard rooms are on the north end of the building. There are no air exchanges in the building and the building runs with a hot water heater. Streiffer will contact the local health department (Cindy Kinnard) to see what kind of involvement they can provide with this. The RP and consultant should work on getting additional information for the surrounding properties. The local health department and/or DHS can assist in educating the surrounding property owners and/or getting the demographics of the people residing there. What is known so far is the property to the east is a multi-family residential apartment complex that may have a basement. The property to the west has been used for commercial use and continues to be used as such and has a shallow basement. Streiffer provided to Beggs the mitigation contractor list that DHS has available on their website, but Beggs also plans to follow up with Borski and Sellwood.

Questions that were brought up during the call was:

- When should the additional vapor assessment/sampling take place on the source property, now or after the system is installed and operating? Do vapor samples need to be collected in the first floor and second floor? Just the first floor or just the second floor?
- When should the additional vapor assessment/sampling take place on the off-site property or properties, now or after the system is installed and operating? Do they need to collect sub-slab and indoor air or can just indoor air be assessed?
- Is there a list of vapor mitigation system contractors that can be provided by DHS and/or DNR to Emery and Brittnacher?

#### 11:30 - 12pm call with Jennifer Borski and Tauren Beggs - DNR

Since there could be acute health risks to the second floor residents on the source property based on evaluation of the current sub-slab and indoor air data collected, Borski recommends that the indoor air of the second floor apartments be assessed and at a minimum the indoor air at the off-site apartment complex depending on the demographics, but would ultimately leave those decisions to DHS. Per discussion with DHS, more immediate sampling would be appropriate to assess any immediate public health risks. Borski also said that it is the responsibility of the RP and consultant to get the demographic and land use information for the surrounding properties, but the health departments (local and/or DHS) could assist in communicating the vapor information and getting the demographics. In regard to only indoor air sampling at the apartment complex, indoor air can be used as an initial tool up front to determine if there are immediate risks to public health, but a full assessment (which includes sub-slab sampling) would be needed. Borski also advised that sub-slab sample data prior to the mitigation system operating would help indicate if there is a vapor intrusion concern at that building without the potential effects the mitigation system could have at decreasing migration of vapors under the apartment complex building.

I will touch base with you today.

Thanks,

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**From:** Beggs, Tauren R - DNR  
**Sent:** Wednesday, December 14, 2016 4:09 PM  
**To:** Sellwood, Alyssa A - DNR  
**Subject:** FW: Vapor results for Allyn property, Algoma

Hi Alyssa,

I have a vapor issue for one of my sites that I just recently received sub-slab and indoor air results for. I have informed DHS and am looking to have a call with the consultant and DHS tomorrow to determine the next actions. Please see the attached vapor data and the responses from myself, DHS, and the consultant. Wanted to make you aware of the situation.

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**From:** Beggs, Tauren R - DNR  
**Sent:** Monday, December 12, 2016 4:34 PM  
**To:** Don Brittnacher ([Don.Brittnacher@omni.com](mailto:Don.Brittnacher@omni.com))  
**Cc:** John Emery ([emery.ja@gmail.com](mailto:emery.ja@gmail.com)); Streiffer, Adam B - DHS  
**Subject:** FW: Vapor results for Allyn property, Algoma

Hi Don,

See below for Department of Health Services' (DHS) response to the data. To summarize DHS and my review of the data:

- If the second floor apartment tenants are still living in the building, a vapor mitigation system needs to be installed to ensure the residence is safe for habitation (generally \$1,500-\$3,000 to install).
  - There are immediate concerns if the residents are pregnant, and if so, should move out immediately.
  - If the tenants are living there they should be trying to ventilate the building in the interim.
- The data on the source property shows there is a sub-slab and indoor air problem, so this could be true for off-site properties as well, especially if any tenants at the off-site properties are pregnant, due to the acute toxicity issue. There is the apartment complex down gradient of the source property and other properties that will need to be sampled based on the vapor intrusion criteria for chlorinated VOCs in RR-800.

- The Department of Health can contact the local health department, if needed.

We should discuss this further on how to proceed.

Sincerely,

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**From:** Streiffer, Adam B - DHS  
**Sent:** Monday, December 12, 2016 2:52 PM  
**To:** Beggs, Tauren R - DNR  
**Cc:** Borski, Jennifer - DNR  
**Subject:** RE: Vapor results for Allyn property, Algoma

Thanks Tauren.

I think that its fine to pass along my email.

I would also make sure to add in your message to John that it is a relatively fast and inexpensive fix to install the mitigation system and make the residences safe for habitation.

(\$1,500-\$3,000 is usually what we tell people for normal homes...)

Adam Streiffer, MSPH  
Bureau of Environmental and Occupational Health  
Wisconsin Dept. of Health Services  
608-266-9337 direct

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**From:** Beggs, Tauren R - DNR  
**Sent:** Monday, December 12, 2016 1:10 PM  
**To:** Streiffer, Adam B - DHS  
**Cc:** Borski, Jennifer - DNR  
**Subject:** RE: Vapor results for Allyn property, Algoma

Hi Adam,

Per OMNNI's December 9, 2016 email below, Harmon and his wife are presently in a rehabilitation center and will be transitioned into an assisted living facility in Green Bay. As follow up to OMNNI and John Emery, are you good with me forwarding this email to them as part of my follow up to them?

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**From:** Streiffer, Adam B - DHS  
**Sent:** Monday, December 12, 2016 12:56 PM  
**To:** Beggs, Tauren R - DNR  
**Cc:** Borski, Jennifer - DNR  
**Subject:** RE: Vapor results for Allyn property, Algoma

Hi Tauren,  
Thanks for the update.

It looked to me based on the son (John's) email that his parents are living there again as of September. But I could be reading the email wrong?  
In any case, from a health perspective, a mitigation system should be installed if tenants continue to live there.

With TCE, at these levels we are concerned with two things:

- 1) In the immediate term, we are concerned with exposures to newly pregnant women, or women who may become pregnant (because of risks to the developing fetus). If any tenants are women of child bearing age, who are pregnant or plan to get pregnant, our recommendation is that they move out immediately.
- 2) Other than the immediate concern to pregnant women and developing fetuses, our concerns with TCE exposure are increased risks of certain cancers and immune system effects over a longer term.

Our (Wisconsin's) fact sheets on TCE are not up to date, and do not reflect the risks to pregnant women. Here is a Massachusetts fact sheet that explains this info:

<http://www.mass.gov/eea/docs/dep/cleanup/laws/tceresin.pdf>

There is often some reduction in concentrations on the 2<sup>nd</sup> floor versus the 1<sup>st</sup> floor. However, the amount of reduction in concentration can vary. Also, we know that indoor air levels fluctuate up and down over seasons and pressure levels. Since it was relatively warm in November when the sampling occurred, it is possible that indoor air TCE and PCE concentrations may be higher in the winter months.

So, based on the sub-slab and 1<sup>st</sup> floor sample results, a mitigation system is warranted, and in my opinion, it is unnecessary to do additional sampling on the 2<sup>nd</sup> floor at this time.

I suppose that the Harmons, as owners of the building, have the prerogative to live there without a mitigation system. Especially at their age, it is a choice they could make.

However, if there are or will be tenants living there, then a mitigation system is necessary.

Lastly, if anyone is living in the building, I recommend in the short term they open the windows or find other ways to ventilate the building. I know that opening windows is a tall order when it is cold... But it is effective for short term reductions in the TCE/PCE concentrations in the air. Jenna Borski has some experience with this, and maybe has some other ideas for how to ventilate?

Please let me know if you have any other questions, or need help conveying this information to John or his parents.

I am also happy to contact the local health department for their assistance. They have the authority to declare a building a health hazard, and can require the mitigation system installed, or the tenants removed, if necessary.

Adam Streiffer, MSPH  
Bureau of Environmental and Occupational Health  
Wisconsin Dept. of Health Services  
608-266-9337 direct

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**From:** Beggs, Tauren R - DNR  
**Sent:** Monday, December 12, 2016 9:30 AM  
**To:** Streiffer, Adam B - DHS  
**Cc:** Borski, Jennifer - DNR  
**Subject:** FW: Vapor results for Allyn property, Algoma

Good morning,

I received the results for the Allyn Property initial vapor sampling. One sub-slab, one indoor, and one outdoor sample were collected. The sub-slab sample detected a very large concentration of PCE, but PCE was detected slightly below the Vapor Action Level (VAL) within the 1<sup>st</sup> floor living area. TCE was detected above both the vapor risk screening level (VRSL) and the VAL (vapor results table attached). As indicated below, the Harmons are no longer living on the first floor of the dry cleaner, but as of the last update I received from John Emery (the son), there are tenants living in the second floor apartments (see attached email). There will need to be additional vapor sampling done on adjacent properties. As far as installing a vapor mitigation system there may be no point to doing that if the building is unoccupied and will remain that way. I will have to find out from John if the tenants are still living on the second floor or if that has changed since the Harmons are no longer living there. Please let me know what you think from a health perspective.

Thanks,

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**From:** Don Brittnacher [<mailto:Don.Brittnacher@omni.com>]  
**Sent:** Friday, December 09, 2016 10:48 AM  
**To:** Beggs, Tauren R - DNR  
**Cc:** John Emery ([emery.ja@gmail.com](mailto:emery.ja@gmail.com))

**Subject:** Vapor results for Allyn property, Algoma

Tauren,

I'm sending the results of the vapor testing at the Allyn property.

Harmon and his wife are presently in a rehabilitation center, and John Emery says they are in the process of transitioning them permanently into an assisted living facility in Green Bay. The first floor of the Allyn property is unoccupied. Plans are to keep it that way, while the Allyn's personal effects are either gifted, sold, or moved to Green Bay.

Don

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