From: Campoli, Karen L - DNR

**Sent:** Tuesday, March 16, 2021 4:20 PM **To:** Chad Fradette; Honea, William

**Cc:** Schultz, Josie M - DNR

**Subject:** FW: Next Steps for VI - Sturgeon Bay Launderers & Cleaners 02-15-576022

Hi Chad and Bill,

I spoke with our vapor team to discuss the proposed work plan, at this time, the DNR does not approve of the proposed work plan. We will need to see a revised work plan and documentations of access attempts for the off-site property. Please see the summary below which states that sub-slab samples are recommended within the on-site building as well as within the off-site building.

Please feel free to contact Josie Schultz or myself with any questions regarding vapor sampling, gaining access and the requested revisions.

Thank you,

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## Karen L. Campoli

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From: Schultz, Josie M - DNR < josie.schultz@wisconsin.gov>

**Sent:** Tuesday, March 16, 2021 12:53 PM

To: Campoli, Karen L - DNR <karen.campoli@wisconsin.gov>

Subject: Next Steps for VI - Sturgeon Bay Launderers & Cleaners 02-15-576022

Hi Karen,

Thank you for discussing the workplan for vapor sampling at the Sturgeon Bay Launderers & Cleaners Site. As discussed, DNR doesn't recommend soil gas sampling in lieu of sub-slab sampling, as soil gas sampling does not offer the same conditions and quality data as sampling vapor accumulation beneath a slab. Sub-slab sampling will be required at the on-site building located at 7 S. 2<sup>nd</sup> Ave, and off-site property located at 111 Michigan St in Sturgeon Bay.

You had mentioned that the off-site property located at 111 Michigan Street has denied access, however it sounds like it may have been a verbal request for access, and no access agreement was provided to the property owner. The RP and/or their representative are required to attempt to obtain signed off-site property access agreements through multiple, good-faith efforts. At a minimum, the RP must provide two written requests to the off-site property owner in attempt to obtain signed off-site property access agreements, and provide copy of letters and proof of receipts to DNR PM (e.g. certified mail receipt or signature and date acknowledging receipt during in-person visit). If after two attempts access is still denied, DNR is required to consult with Department of Health Services (DHS), and potentially local health, before DNR sends a third and final request for access via certified mail. The consultant and/or RP can find outreach tools including template letters and access agreements on DNR

website at <a href="https://dnr.wisconsin.gov/topic/Brownfields/Vapor.html">https://dnr.wisconsin.gov/topic/Brownfields/Vapor.html</a>, under the *Community Outreach* tab.

Sampling at these two properties should follow RR-986 sub-slab vapor sampling procedures, including:

- Three sub-slab probes per 5,000 sf with one probe for each additional 2,000 sf;
- two rounds of 30-minute sub-slab sampling, with at least one round performed during heating season (i.e. winter);
- proper leak testing on both the sample train and sample probe; and
- sample analysis should be limited to the contaminants of concern; CVOCs (i.e. PCE, TCE, DCE, and Vinyl Chloride.

Please let the consultant and/or RP know that they can contact me directly if they have questions about the vapor sampling requirements, or gaining access.

Thanks, Josie

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Josie M. Schultz

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