

From: Beggs, Tauren R - DNR
Sent: Wednesday, June 9, 2021 11:29 AM
To: Steve Schmutzer; Richard Carey; Ross Niemi
Cc: Brian Kappen; Robert Fedorchak
Subject: Technical Assistance Response Letter for Cobblestone Hotel & Suites, BRRTS # 07-36-587700
Attachments: 20210609_98_Tech_Assist_Provide.pdf

Hi Steve, Rick, and Ross,

Attached is the Technical Assistance Response Letter for the Cobblestone Hotel & Suites property in Two Rivers. If you have any questions regarding this letter, please feel free to contact me.

Regards,

We are committed to service excellence.

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Tauren R. Beggs

Hydrogeologist & Northeast Region Land Recycling Expert

Remediation and Redevelopment Program

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June 9, 2021

Steve Schmutzer
Brimark Builders
980 American Drive
Neenah, WI 54956

Ross Niemi and Richard Carey
Two Rivers Hotel Group, LLC
1700 Monroe Street
Two Rivers, WI 54241

Subject: Response to Technical Assistance Request – Vapor Assessment and Mitigation
Cobblestone Hotel & Suites
1407 16th Street, Two Rivers, WI 54241
BRRTS #: 07-36-587700

Dear Mr. Schmutzer, Mr. Niemi, and Mr. Carey:

This letter is written in response to a Technical Assistance (TA) Request that included the *Passive Vapor Mitigation System Installation Report* submitted on your behalf by EnviroForensics, LLC (EnviroForensics). The request was received by the Wisconsin Department of Natural Resources (DNR) on August 24, 2020, with the \$700 review fee as required by Wisconsin Administrative Code (Wis. Admin. Code) § NR 749.04(1). DNR had calls with the property owner (Two Rivers Hotel Group, LLC) and EnviroForensics in October and November 2020. On November 11, 2020, the DNR required additional actions prior to being able to provide a response to this TA request. The additional actions were completed and documentation was received on April 7, 2021, in a letter titled *Vapor Intrusion Assessment Results* submitted on your behalf by EnviroForensics. The DNR then reviewed the documentation to provide a final response to the TA request.

The purpose of this letter is to provide a response to the TA request for DNR concurrence that:

- There is not a current unacceptable risk of exposure to employees or visitors to the site through the vapor intrusion pathway based on what is currently known; and
- An active vapor mitigation system is not necessary at this time.

Summary Determination

The DNR concurs that there is no unacceptable risk through the vapor intrusion pathway based on what is currently known and has determined that an active vapor mitigation system is not required to operate at the hotel at this time based on the post-construction sub-slab/sub-membrane vapor and passive air sampling completed at the site.

Background

Two Rivers Hotel Group, LLC acquired the property at 1407 16th Street in Two Rivers, WI, for the purpose of redevelopment into the Cobblestone Hotel & Suites. As part of the redevelopment, lead contamination was found in soil and investigated as part of the Two Rivers Hotel Group LLC Property contamination case (BRRTS # 02-36-584382) on-site. Furthermore, a vapor assessment was completed and mitigation measures were installed in

Mr. Steve Schmutzer, BriMark Builders, Mr. Niemi and Mr. Carey, Two Rivers Hotel Group, LLC
Response to Technical Assistance Request – Vapor Assessment and Mitigation
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the newly constructed hotel building to ensure it would be protective for potential vapor intrusion that could be caused by off-site chlorinated volatile organic compound (CVOC) contaminant migration via groundwater from the Hamilton Industries Site (Former) contamination case (BRRTS # 02-36-578316) located at 1316 18th Street, Two Rivers, WI.

The hotel was constructed throughout 2019 and 2020. A passive vapor mitigation system and vapor barrier were installed as part of the new construction of the hotel. A vapor assessment was completed to determine if the passive system needed to be converted to an active system. This included two rounds of vapor sampling from five sub-slab/sub-membrane vapor ports which occurred in early April 2020 and July 2020. See the attached Figure 1, Above-Grade Passive Vapor Mitigation Diagram and Sub-Slab Vapor Port Locations, dated 7/28/2020.

The DNR reviewed the vapor sampling results and the vapor mitigation system documentation in the *Passive Vapor Mitigation System Installation Report* submitted to the DNR on August 24, 2020. The DNR had follow up calls with Two Rivers Hotel Group, LLC and EnviroForensics in October and November 2020 for clarification on information in the report and additional actions needed. On November 11, 2020, the DNR required the following additional actions:

- 1) The April 2020 vapor sampling was not considered a representative sample during the heating season (winter), so an additional round of vapor sampling was needed;
- 2) Additional information was needed for the construction of the elevator shaft along with a passive indoor air sample from the elevator shaft; and
- 3) Additional clarification on components of the vapor mitigation system were needed.

These additional actions were completed in February and March 2021 and documented in the letter *Vapor Intrusion Assessment Results* submitted to the DNR on April 7, 2021. The five sub-slab sampling locations were re-sampled in February 2021. One of the samples (SS-2) had an anomalous result, so it was re-sampled again in March 2021.

Determination

DNR has reviewed the documentation submitted and determined the following:

- 1) There is not a risk of vapor intrusion to the hotel based on what is currently known; therefore, a vapor mitigation system is not required to operate at this time as a continuing obligation.
- 2) The data from the February 2021 vapor sample from SS-2 is considered an anomaly and was discounted based on the following:
 - No identified source for tetrachloroethene (PCE) beyond occasional low level PCE detected in groundwater;
 - Indoor air data from the elevator shaft had no detections above the vapor action levels (VALs);
 - Receptor is a hotel (transient population); and
 - All other sub-slab/sub-membrane vapor data collected was below vapor risk screening levels (VRSLs).

This decision is site-specific and should not be used as justification to discount data collected from another site with different site and contaminant conditions.

- 3) The DNR reviewed the documentation of the elevator shaft construction and determined the construction was adequate based on the following:
 - The indoor air data from the elevator shaft showed no exceedances of the VALs;
 - Presence of the vapor barrier and passive system surrounding the elevator shaft;

Mr. Steve Schmutzer, BriMark Builders, Mr. Niemi and Mr. Carey, Two Rivers Hotel Group, LLC
Response to Technical Assistance Request – Vapor Assessment and Mitigation
Cobblestone Hotel & Suites, BRRTS # 07-36-587700

- Presence of the 60-mil waterproof membrane along the sides of the elevator shaft;
 - Receptor is a hotel (transient population); and
 - All sub-slab/sub-membrane vapor data collected was below the VRSLs, with the SS-2 data from February 2021 being discounted as an anomaly.
- 4) This property will likely be assigned a continuing obligation for potential future vapor risk at the time of case closure of the Hamilton Industries Site (Former) contamination case (BRRTS # 02-36-578316) if conditions were to change at the property in the future where a potential vapor risk could be encountered.

The technical assistance request and response can be found in the Bureau for Remediation & Redevelopment Tracking System (BRRTS) on the Web (BOTW) in Cobblestone Hotel & Suites, BRRTS # 07-36-587700 and the Hamilton Industries Site (Former), BRRTS # 02-36-578316.

If you have any questions regarding this letter, please contact me at 920-510-3472 or at Tauren.Beggs@wisconsin.gov.

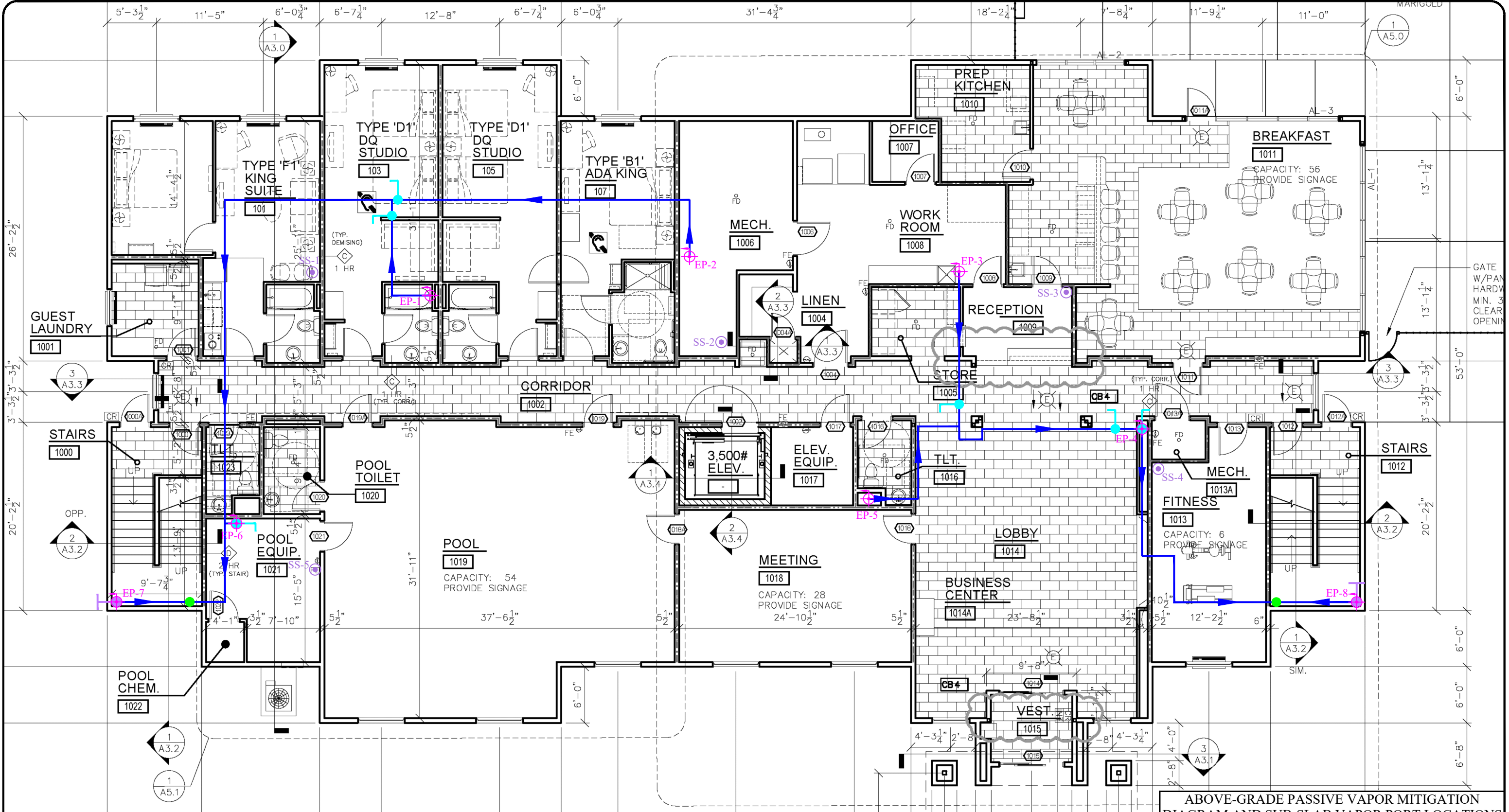
Sincerely,



Tauren R. Beggs
Hydrogeologist
Remediation & Redevelopment Program

Attachment: Figure 1, Above-Grade Passive Vapor Mitigation Diagram and Sub-Slab Vapor Port Locations, dated 7/28/2020

cc: Robert Fedorchak, EnviroForensics, LLC (rfedorchak@enviroforensics.com)
Brian Kappen, EnviroForensics, LLC (bkappen@enviroforensics.com)



Legend

- 4" PVC vapor conveyance piping from extraction points (Arrow for flow direction)
- 4" PVC gate valve
- 4" PVC butterfly valve
- 6" PVC vapor conveyance riser pipe to roof exhaust
- Z
- EP-1 Extraction point
- SS-1 Sub-slab sample

APPROXIMATE SCALE: 1" = 10'

- Note:**
1. Access panels are required to be installed by BriMark to operate valving for EP-1, EP-2, EP-4, EP-7, & EP-8
 2. Valve for EP-3 & EP-5 will be accessible from proposed drop ceiling in hallway
 3. Valves for EP-4 & EP-6 are located on the vertical portion of the vapor extraction point
 4. Valves for EP-7 & EP-8 are located under the stairs

Date:	7/28/20
Designed:	EB
Drawn:	EB
Checked:	GR
DWG file:	300040-0288

ABOVE-GRADE PASSIVE VAPOR MITIGATION DIAGRAM AND SUB-SLAB VAPOR PORT LOCATIONS

Cobblestone Hotel & Suites
 1407 16th Street
 Two Rivers, Wisconsin



825 North Capitol Avenue • Indianapolis, IN 46204
 EnviroForensics.com

Figure	1
Project	300040