

From: Mitchell, Jeremy A - DNR
Sent: Tuesday, May 25, 2021 10:30 AM
To: Rob Hoverman
Cc: emilboohar@hotmail.com; Kirk Booher (BooharRealEstate@aol.com)
Subject: Donaldson's Cleaners (Former) - E Edgewood Dr (02-45-586961) - VMS Report Revisions

Hello,

Following up on the recent Sub-Slab Depressurization System Installation Report submitted on 03/03/2021. This report, after review with the NER vapor team, will need the following revisions:

1. Please include the DNR Site Name in Subject
2. A separate OM&M Plan (generally an appendix to the IAR or Closure Request) is required per Wis. Admin. Code §§ NR 724.13(1)(c) & NR 724.13(2). Note (2)(k) specifically and ref. [RR-981](#) for a template. The SSDS Installation Report is a document for DNR to verify proper mitigation and for environmental/mitigation professionals to reference for system repairs. The purpose of the OM&M Plan is for the non-technical property owner or tenant(s) to understand the need for the system and exactly what needs to be done to assure the system continues to operate for protectiveness. The OM&M Plan should specify the specific system components: 3 extraction points, mitigation fan, audible alarm, contact for repair or inspection, etc. for the routine inspection by non-technical individuals.
3. Monthly manometer readings & annual inspections are "required" per Wis. Admin. Code § NR 724.13(2)(m) & (n). This should be included in the SSDS Installation Report and OM&M Plan. The current SSDS Installation Report recommends periodic inspection, annually at a minimum. This is not adequate for code compliance or assurance the system will remain protective. For VMS's DNR suggests annual inspection in September prior to the winter heating season when VI is greatest risk in WI.
4. Form 4400-321, *Vapor Mitigation System Inspection Log* needs to be utilized per Wis. Admin. Code § 726.11(2)(d). This form was created specifically for non-technical owners/tenants to understand various system components, what they look like, what to check and when to follow-up. Create a site-specific form utilizing the "+" & "-" buttons on the right of the form (e.g., 3 drop points, no sealed sump, 4 vapor pins remain for PFE) for the owner to use. Site-specific photos recommended.
5. Edit photos to include title, date taken, description of feature, etc. per Wis. Admin. Code § NR 724.13(2)(k) & RR-981.

Also, I wanted to inform you that Mr. Donaldson's lack of action on this matter has resulted in them being referred to DOJ by the Environmental Enforcement program. Ultimately, if the Causer does not take action the responsibility falls on the landowner to move through the NR700 process. To keep this case moving, I recommend that you begin a Phase I. This may also help provide pertinent details with regards to the Enforcement case against Donaldson's and would satisfy the Remediation & Redevelopment's requirements to keep this case moving through the NR700 process. I think this would be an appropriate starting point now that we have taken care of the immediate risk with the vapor mitigation system.

Please let me know if you need to discuss further.

Thanks,

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Jeremy Mitchell

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