

**From:** Matt Dahlem <mdahlem@fehrgraham.com>  
**Sent:** Wednesday, May 3, 2023 2:57 PM  
**To:** Beggs, Tauren R - DNR  
**Subject:** RE: Comments for Vapor Ports and/or Mitigation System Design for CVOC Site, Bright Horizon Properties LLC (Former), aka West River Lofts, BRRTS # 02-36-589295

Awesome – and will do – all this will be in our plans. Thanks so much there Tauren.

Matt



**MATT DAHLEM, PG | Branch Manager**  
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**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Sent:** Wednesday, May 3, 2023 2:26 PM  
**To:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Subject:** Comments for Vapor Ports and/or Mitigation System Design for CVOC Site, Bright Horizon Properties LLC (Former), aka West River Lofts, BRRTS # 02-36-589295

Hi Matt,

As mentioned to you last week, I brought up the high level plan for vapor for this site to regional and statewide DNR vapor staff today. I wanted to confirm some things prior to you submitting your plan that the similar approach as the Riiser Fuels site redevelopment would be sufficient for the redevelopment at this chlorinated volatile organic compound (CVOC) site. The DNR vapor staff provided the following comments about vapor port design, mitigation (interim action), investigation, and/or remediation:

- The previously approved sub-slab vapor (SSV) sampling point design from Fehr Graham is appropriate for evaluating future vapor risk and/or measuring pressure field extension on an active system during future construction for this site.
- Indoor air from the building and within the elevator should occur concurrently with SSV sampling.
- DNR strongly recommends engaging a National Radon Proficiency Program (NRPP) Certified Radon Mitigator familiar with chlorinated volatile organic compound (CVOC) mitigation at similar sites to evaluate or design the sub slab system.
- The DNR does not approve the selection of vapor barrier brands; however, the minimum thickness of the vapor barrier should be 15-Mil and ideally closer to 50-Mil.

- The first round of concurrent SSV and indoor air sampling needs to be completed with the building fully enclosed and HVAC running prior to occupancy. If VRSLs are exceeded, the vapor mitigation system needs to be turned active, needs to be properly commissioned, and an OM&M Plan prepared. Refer to Appendix D of RR-800 for commissioning guidelines. Three rounds of sampling below VRSLs and VALs are needed for residential settings to justify an active system is not needed to mitigate vapor.
- If active mitigation is deemed necessary, then at a minimum an audible on-site alarm should be added. Additional considerations would be battery or solar backup power and remote telemetry and notifications for property managers which may not reside on-site.
- Active remediation may provide more protection than an interim action.
- DNR understands the site investigation is still underway for this site. Nearby properties within 100 feet of CVOC impacted soil should be evaluated for vapor intrusion. DNR also suggests nearby properties within 100 feet of any groundwater ES exceedance of TCE be evaluated for vapor intrusion.

If you have any questions, please let me know.

Regards,

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**Tauren R. Beggs**

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