

**From:** Beggs, Tauren R - DNR  
**Sent:** Friday, July 14, 2023 10:07 AM  
**To:** Que El-Amin  
**Cc:** Matt Dahlem; Elizabeth Runge; Korina Aghmar;  
jessicawanserski@manitowocountywi.gov; inspect@two-rivers.org; Kristin  
Holloway Jones (kristin.jones@newellco.com); Sawula, Andrew N.; Rodriguez,  
Gabriel M.; Paul Lindquist; Susan Petrofske  
**Subject:** Response Letter for Sub-Slab Vapor Mitigation System Design and Vapor  
Sampling Plan, Bright Horizon Properties LLC (Former), BRRTS # 02-36-589295  
**Attachments:** 20230714\_98\_Tech\_Assist\_Provide.pdf

Good morning Que,

The attached letter is the formal approval letter for the Sub-Slab Vapor Mitigation System Design and Vapor Sampling Plan for the above referenced site. If you have any questions, please let me know.

Regards,

**We are committed to service excellence.**

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

**Tauren R. Beggs**

Hydrogeologist & Northeast Region Land Recycling Expert

Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

2984 Shawano Ave

Green Bay, WI 54313

Phone: (920) 510-3472

[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov) (preferred contact method during work at home)

[dnr.wi.gov](http://dnr.wi.gov)



July 14, 2023

West River Lofts, LLC  
Attn: Que El-Amin  
4201 N. 27<sup>th</sup> Street  
Milwaukee, WI 53216  
Via Electronic Mail to [que@scott-crawford.com](mailto:que@scott-crawford.com)

Subject: Response to Technical Assistance Request – Sub-Slab Vapor Mitigation System Design, Vapor Port Design, and Vapor Sampling  
Bright Horizon Properties, LLC (Former), 1621 14<sup>th</sup> Street (formerly 1702 13<sup>th</sup> Street), Two Rivers, WI  
BRRTS #: 02-36-589295; FID #: 436010300

Dear Mr. El-Amin:

This letter is written in response to a Technical Assistance Request for a Sub-Slab Vapor Mitigation System Design, including vapor port design and vapor sampling (Request), submitted on your behalf by Matt Dahlem of Fehr Graham. The Request was initially received by the Wisconsin Department of Natural Resources (DNR) on March 8, 2022, with the \$700 review fee as required by Wisconsin Administrative Code (Wis. Admin. Code) § NR 749.04(1). On April 7, 2022, the Request was paused to gather additional information for the vapor design. The sub-slab vapor mitigation system design, vapor port design, and vapor sampling plan was revised, and a new plan was submitted on June 9, 2023. Revisions were requested by DNR on June 22 and June 29, 2023. Finalized documentation incorporating the DNR's revisions was submitted by Fehr Graham on June 29, 2023. DNR provided a conditional approval on June 29, 2023. As requested by DNR, a copy of the Sub-Slab Vapor Mitigation System Design documentation was also provided in a letter format on July 10, 2023. This letter acts as the formal approval for the Request.

### **Determination**

DNR has reviewed the Request and concurs with the sub-slab vapor mitigation system design, vapor port design, and vapor sampling plan. The key components of the Request include the following:

- The sub-slab vapor mitigation system is planned to be installed during construction of the building, including a vapor barrier and proper sealing of the elevator shaft. A National Radon Proficiency Program (NRPP) certified mitigator will be installing the sub-slab vapor mitigation system.
- The first round of sub-slab vapor and indoor air sampling will be completed with the building fully enclosed and heating, ventilation, and air conditioning (HVAC) running.
- Prior to occupancy of the building, the first round of sub-slab vapor and indoor air sampling will be completed, and data submitted to the DNR to confirm vapor risk screening levels (VRSLs) and vapor action levels (VALs) are not exceeded to avoid exposure to future residents. The tentative date for the first round of sampling is July 2024, with subsequent sampling rounds in September 2024, and December 2024. See the attached figure for sub-slab vapor and indoor air sampling locations.
- If the vapor data indicates a VRSL exceedance that warrants active mitigation, then the mitigation system will be turned active, proper commissioning of the system will be conducted, and an Operation, Monitoring, & Maintenance Plan will be prepared and submitted in accordance with Section 9: System Commissioning and Section 10: Operation, Monitoring, and Maintenance (OM&M) of DNR Guidance

July 14, 2023

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West River Lofts, LLC, Que El-Amin

Response to Technical Assistance Request – Sub-Slab Vapor Mitigation System Design, Vapor Port Design, and Vapor Sampling

Bright Horizon Properties, LLC (Former), BRRTS #: 02-36-589295

Document, Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin (RR-800) and Maintenance Plans for Vapor Mitigation Systems (RR-981).

If the building construction is completed earlier than expected, then the timing for the first sampling round needs to be adjusted to ensure vapor and indoor air data is collected prior to occupancy and subsequent rounds may also need to be adjusted. Notify DNR if the timeline for sampling needs to be changed based on the construction schedule as development progresses.

The Technical Assistance Request and response can be found in the Bureau for Remediation & Redevelopment Tracking System (BRRTS) on the Web (BOTW), go to [dnr.wi.gov](http://dnr.wi.gov), and search “BOTW.” Use the BRRTS # found at the top of this letter. The site can also be found on the map view, Remediation and Redevelopment Sites Map (RRSM) by searching “RRSM.”

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 920-510-3472 or at [Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov).

Sincerely,

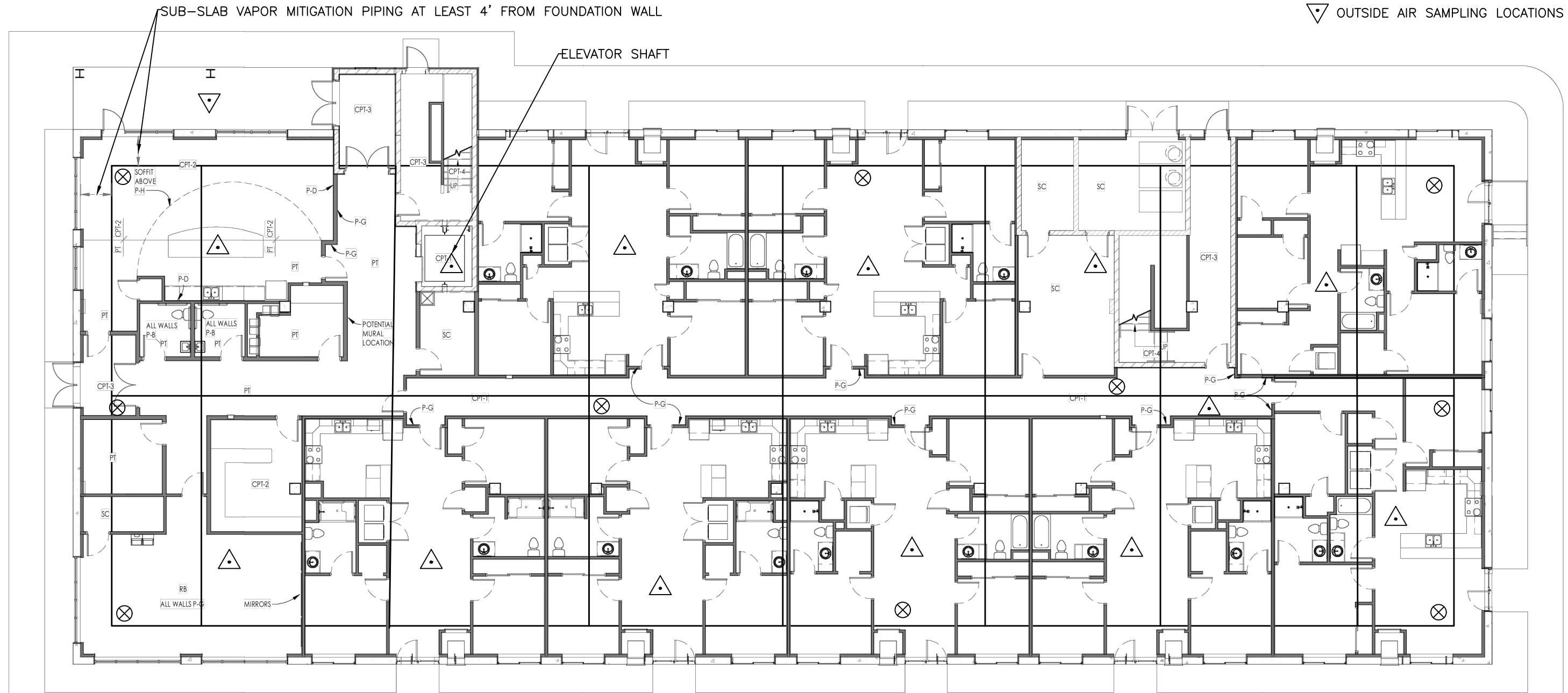


Tauren R. Beggs  
Northeast Region Project Manager  
Remediation & Redevelopment Program

Attachment: Sheet Number 2 of 21, Sampling Port & Air Sampling Locations, dated June 29, 2023

cc: Matt Dahlem, Fehr Graham ([mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com))  
Elizabeth Runge, City of Two Rivers ([elirun@two-rivers.org](mailto:elirun@two-rivers.org))  
Kristin Jones, Newell Operating Company ([Kristin.Jones@newellco.com](mailto:Kristin.Jones@newellco.com))  
Andrew Sawula, Arent Fox Schiff ([andrew.sawula@afslaw.com](mailto:andrew.sawula@afslaw.com))  
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Korina Aghmar, Manitowoc County Health Department ([korinaaghmar@manitowocountywi.gov](mailto:korinaaghmar@manitowocountywi.gov))  
Jessica Wanserski, Manitowoc County Health Department ([jessicawanserski@manitowocountywi.gov](mailto:jessicawanserski@manitowocountywi.gov))  
Jane Drager, City of Two Rivers Building Inspection ([inspect@two-rivers.org](mailto:inspect@two-rivers.org))

- ⊗ SUBSLAB SAMPLING PORT
- △ INDOOR AIR SAMPLING LOCATIONS
- ▽ OUTSIDE AIR SAMPLING LOCATIONS



NOTE: PLAN FROM ABACUS ARCHITECTS SHEET A324 OF ARCHITECTURAL PLANS  
NOT TO SCALE

# FEHR GRAHAM

ENGINEERING & ENVIRONMENTAL

ILLINOIS DESIGN FIRM NO. 194-003525

ILLINOIS  
IOWA  
WISCONSIN

OWNER/DEVELOPER:  
BRIGHT HORIZON PROPERTIES, LLC  
1621 14TH STREET  
TWO RIVERS, WI 54241

PROJECT AND LOCATION:  
WEST RIVER LOFTS, LLC  
TWO RIVERS, WI

DRAWN BY: TJT  
APPROVED BY: MJD  
DATE: 6/05/23  
SCALE: AS NOTED

REVISIONS		
REV. NO.	DESCRIPTION	DATE
1	NOTE CHANGES	6/28/23
2	ADDITIONAL NOTE CHANGES	6/29/23

DRAWING:  
SAMPLING PORT & AIR SAMPLING LOCATIONS

SET TYPE: PRELIMINARY

G:\30\22-221+22-1486 moved 23-948\Plans\22-221 Design.dwg, SAMPLING PORT & AIR SAMPLING LOCATIONS

JOB NUMBER:  
22-221

SHEET NUMBER:  
2 of 21