

Mylotta, Pamela A - DNR

From: Drews, Mark D - DNR
Sent: Thursday, May 14, 2020 10:33 AM
To: richardg@kprginc.com
Cc: Drews, Mark D - DNR; Walden, James E -DNR; Mylotta, Pamela A - DNR
Subject: FW: Navistar International Corp 02-68-0098404 Compliance Assistance Request

Rich,

Jim Walden and I took a look at the compliance assistance request KPRG submitted and soil vapor update submitted on May 4th (Monday). This site is complicated by the large number of properties that are being assessed (there are 93 properties that don't have an access denial). Because TCE is the primary contaminant of concern, TCE has been well above the VAL in some houses, and women of childbearing years are known to reside at some locations, the concerns relating to COVID-19 will have to be balanced against the potential short-term risk from exposure to TCE. In the request, KPRG appears to be requesting suspension of all indoor work for an indefinite period of time. Because each property represents a unique set of circumstances, provide additional information for each property so that DNR and DHS can weigh the relative risk at each property. We understand that at some houses which had an exceedance of the VAL, a mitigation system has been installed and have performed confirmation indoor air sampling and pressure field extension testing which largely shows the system is effective. Only additional rounds of confirmation are needed to substantiate that. For such cases it may be less imperative that additional sampling is done in the near term. However, if at other properties sufficient samples haven't been collected to establish that concentrations are acceptable, there would be a more compelling reason to sample in the near term. At some other investigations, residents are allowing access for sampling during the Safer at Home period and the consultant is undertaking this work using additional precautions.

Such that we can effectively review their request, we recommend that they submit a table that includes all properties where a denial for access has not been submitted. Please include the following information for each property:

- Address
- Specific work they are proposing to delay (that is, what activity were they anticipating to perform during the next 90 days – such as initial or follow-up sub-slab or indoor air sampling, mitigation system installation, confirmation indoor air sampling, proficiency testing)
- Demographic information (for the purpose of this evaluation the important categories are pregnant women, women ages 15 to 44 – these are the categories more at risk for TCE exposure; individuals over 60, or medically vulnerable (for example, compromised immune system, diabetes, etc.) – these are the categories more at risk from COVID-19. For our initial review we would recommend to submit the information collected and not attempt to solicit this information for each property. After we complete an initial review of the properties, we can decide at which properties we need the additional information to make a decision.
- The highest and most recent indoor air sample
- A short description of circumstances at the property which would assist us in deciding whether to allow a delay in the activity.

Please submit the requested information to Jim Walden and myself. Thanks.

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

Mark Drews

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