

Mylott, Pamela A - DNR

From: Rich Gnat <RichardG@KPRGINC.COM>
Sent: Thursday, May 14, 2020 11:44 AM
To: Walden, James E -DNR; Drews, Mark D - DNR
Cc: Mylott, Pamela A - DNR; Borski, Jennifer - DNR
Subject: RE: Navistar International Corp 02-68-0098404 Compliance Assistance Request

Just an FYI but we did have some samplings that were scheduled for April but they were cancelled by the property owners. After that I did not place any new calls, however, as I noted in previous e-mail, that is starting up again at this point.

Rich Gnat

From: Walden, James E -DNR <jamese.walden@wisconsin.gov>
Sent: Thursday, May 14, 2020 11:14 AM
To: Rich Gnat <RichardG@KPRGINC.COM>; Drews, Mark D - DNR <Mark.Drews@wisconsin.gov>
Cc: Mylott, Pamela A - DNR <Pamela.Mylott@wisconsin.gov>; Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>
Subject: RE: Navistar International Corp 02-68-0098404 Compliance Assistance Request

Hi Rich:

Give us a chance to discuss this issue with Jennifer Borski (who is coordinating the Compliance Assistance Requests relating to vapor investigations) and then we will get back to you. My initial thought is that the Compliance Assistance Request process was for when the responsible party was looking to delay sampling due to the COVID 19 situation only. I know of other investigations where the property owner, consultant and responsible party were comfortable with indoor air sampling and they are proceeding with indoor work, taking extra precautions using PPE, distancing, etc. We will let you know as soon as possible. Thanks.

We are committed to service excellence.

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

James Walden

Hydrogeologist, P.G. – Vapor Intrusion Expert
Bureau for Remediation and Redevelopment
Wisconsin Department of Natural Resources
Cell: 608-640-6639 (primary)
Phone: 608-267-3131
jamese.walden@wisconsin.gov



From: Rich Gnat <RichardG@KPRGINC.COM>
Sent: Thursday, May 14, 2020 10:43 AM
To: Drews, Mark D - DNR <Mark.Drews@wisconsin.gov>

Cc: Walden, James E -DNR <jamese.walden@wisconsin.gov>; Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>

Subject: RE: Navistar International Corp 02-68-0098404 Compliance Assistance Request

Mark. At the present time, with the overturn of the Safer at Home Order, we intend to start up calls and scheduling access starting Monday May 18th for continued monitoring as people allow. Considering this do we need to through the below exercise?

Rich Gnat

From: Drews, Mark D - DNR <Mark.Drews@wisconsin.gov>

Sent: Thursday, May 14, 2020 10:33 AM

To: Rich Gnat <RichardG@KPRGINC.COM>

Cc: Drews, Mark D - DNR <Mark.Drews@wisconsin.gov>; Walden, James E -DNR <jamese.walden@wisconsin.gov>; Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>

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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Mark Drews

Remediation & Redevelopment Program
Wisconsin Department of Natural Resources
141 NW Barstow St., Rm 180
Waukesha, WI 53188
Phone: 262-574-2146
Cell Phone: 262-894-7156
Fax: 262-574-2128
mark.drews@wisconsin.gov



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