

Myllotta, Pamela A - DNR

From: Myllotta, Pamela A - DNR
Sent: Tuesday, May 26, 2020 3:56 PM
To: Rich Gnat
Cc: Drews, Mark D - DNR
Subject: FW: Navistar International Corp 02-68-0098404 Compliance Assistance Request

Hello Rich,

On May 5, 2020, you submitted a Compliance Assistance Request for Former Navistar/RMG Foundry project in Waukesha, BRRTS # 02-68-098404. You stated that field work related to vapor testing was delayed due to the Governor's Safer at Home order for the COVID-19 response. After evaluating your request, DNR asked you on May 14 to provide specific information to help us complete our review of your request. You responded on May 14 that, due to the Safer at Home order being lifted, you intended to resume field work as of May 18. Your email today (May 26) confirmed that you resumed these activities as of May 18, by contacting homeowners to set up sampling appointments.

Because you have resumed your field efforts before responding to our information request, the DNR is concluding our review of your original request for compliance assistance, and you are not required to provide the information we requested on May 14. We do, however, ask that you keep your DNR project manager Mark Drews informed about the status of your access requests, and in doing so, provide demographic information for locations where access has not been granted or no response is being received.

Please contact Mark Drews with any questions, or if at any time during the COVID-19 situation your company policies or other government restrictions prevent you from conducting further work on this project.

Thank you.
Pam Myllotta

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Pamela A. Myllotta

Southeast Region Team Supervisor – Remediation & Redevelopment Program
Wisconsin Department of Natural Resources

Cell Phone: (414) 374-2423
pamela.myllotta@wisconsin.gov



From: Drews, Mark D - DNR <Mark.Drews@wisconsin.gov>
Sent: Tuesday, May 26, 2020 3:04 PM

To: Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>
Subject: FW: Navistar International Corp 02-68-0098404 Compliance Assistance Request

Pam,
Here is the response from Rich. They are back up and running.

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Mark Drews

Phone: 262-574-2146

Cell Phone: 262-894-7156

Mark.Drews@wisconsin.gov

From: Rich Gnat <RichardG@KPRGINC.COM>
Sent: Tuesday, May 26, 2020 2:58 PM
To: Drews, Mark D - DNR <Mark.Drews@wisconsin.gov>
Subject: RE: Navistar International Corp 02-68-0098404 Compliance Assistance Request

Mark. We restarted the program last week Monday with calls and ordering samplers. Today we are starting at Healey Mfg. and tomorrow through Friday we are set up at five residences. I have calls out to 10 or 15 other residences and continuing to call others for scheduling. I am also coordinating with the install contractor regarding follow-up FET. So I can honestly say the program is back up and running.

Rich

From: Drews, Mark D - DNR <Mark.Drews@wisconsin.gov>
Sent: Tuesday, May 26, 2020 2:53 PM
To: Rich Gnat <RichardG@KPRGINC.COM>
Cc: Drews, Mark D - DNR <Mark.Drews@wisconsin.gov>
Subject: RE: Navistar International Corp 02-68-0098404 Compliance Assistance Request

Rich,
Are you planning to start up the vapor sampling process again or do you need to continue with the Compliance Assistance Request?

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Mark Drews

Phone: 262-574-2146

Cell Phone: 262-894-7156

Mark.Drews@wisconsin.gov

From: Rich Gnat <RichardG@KPRGINC.COM>
Sent: Thursday, May 14, 2020 11:44 AM
To: Walden, James E -DNR <jamese.walden@wisconsin.gov>; Drews, Mark D - DNR <Mark.Drews@wisconsin.gov>
Cc: Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>; Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>
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: Mylotta, Pamela A - DNR <Pamela.Mylotta@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.

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James Walden

Hydrogeologist, P.G. – Vapor Intrusion Expert
Bureau for Remediation and Redevelopment
Wisconsin Department of Natural Resources
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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
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