



December 11, 2020

Mr. Shane LaFave (via electronic mail)
c/o Mr. Brian Roers
Community Within the Corridor Limited Partnership
110 Cheshire Ln., Ste. 120
Minnetonka, MN 55305

Subject: Vapor Investigation Work Plan
Wisconsin Industries Pension Plan & Trust
2748 N. 32nd St., Milwaukee, WI
DNR BRRTS #02-41-263675, FID #241025400

Dear Mr. LaFave:

On November 12, 2020, the Wisconsin Department of Natural Resources (DNR) received a 'Sub-Slab Vapor Investigation Work Plan' (VIWP), submitted by K. Singh & Associates, Inc. (K. Singh), on behalf of the Community Within the Corridor Limited Partnership, for the property described above. The DNR provided an approval to the VIWP with some requested modifications to the plan on December 2, 2020. On December 9, 2020, the DNR received a response dated December 3, 2020 from K. Singh. This letter is in response to K. Singh's December 3, 2020 letter.

Background

The VIWP proposes site investigation activities, including sub-slab vapor sampling, to evaluate the potential risk posed by vapor intrusion at the site. The VIWP was developed due to the potential redevelopment of the property for residential use. A historic hazardous discharge existed on the property and was addressed under BRRTS #02-41-263675 which was closed in August 2008 with continuing obligations applied to closure, including maintaining a cap over the contaminated area and mitigating vapor intrusion. K. Singh proposes to submit a report once the investigation is complete.

DNR Comments

We want to thank you and K. Singh for the thoughtful responses to our approval letter. The DNR concurs that the actions outlined in K. Singh's December 3, 2020 letter should be completed. K. Singh had several questions and requested DNR's input. The DNR offers the following responses to K. Singh's questions below:

"K. Singh proposes to move sub-slab vapor probes SS-4, SS-19, SS-25, and SS-37 closer to nearest elevator pits in order to acquire the requested sub-slab vapor samples. All of the points are within 25 feet of the elevator pits and additional subslab vapor sampling points are expected to render the already proposed points redundant."

The DNR concurs moving sub-slab vapor probes SS-4, SS-19, SS-25, and SS-37 closer to the nearest elevator pits will be sufficient, and no additional vapor probes near the elevator pits are necessary at this time.

“KSingh asks for more specific information on what WDNR is requesting for passive indoor air sampling of the elevator pits. The guidance in RR-800 is general for TO-17 sampling using passive absorbent media. In addition, we do not know if sub-slab vapor sampling is going to identify areas of concern near the elevator pits. KSingh proposes that any indoor air sampling be performed after the results of sub-slab vapor sampling is known.”

The DNR concurs indoor air sampling can be performed after the results of sub-slab vapor sampling is known. We will review guidance related to passive air sampling in elevator pits to help plan your sampling and will provide some feedback on this subject in January. In the meantime, please review the following EPA Engineering Issue Paper titled *“Passive Samplers for Investigations of Air Quality: Method Description, Implementation, and Comparison to Alternative Sampling Methods”*: <https://nepis.epa.gov/Adobe/PDF/P100MK4Z.pdf>.

“KSingh will preserve the vapor probes that can be preserved, but construction activities will likely require abandonment of a significant number of vapor probes. In addition, final improvements, such as the wooden basketball courts, will not be compatible with the existing vapor probes and KSingh will want to avoid damaging new floor coverings in areas of occupancy or public use. To that end, KSingh will propose a plan for a second round of sampling following the receipt of the first round of sub-slab vapor sampling. In addition, KSingh recommends that any second round of sampling be performed prior to occupancy of the building.”

The DNR understands construction activities within the building must commence and that vapor probes will need to be abandoned. Less obtrusive vapor probe locations will be considered for additional rounds of sampling. As stated in our December 2, 2020 approval letter, we recommend a minimum of one additional round of sub-slab vapor sampling after redevelopment is complete, the HVAC systems are installed and operating, and the building is under standard operating conditions.

As K. Singh prepares their report, please have them include a proposal for passive indoor air sampling in the elevator pits, a proposal for a second round of sampling, and a proposal for any mitigation systems.

We look forward to your results and working with you during this project. If you have any questions, please contact me at (414) 639-4156 or david.hanson@wisconsin.gov.

Sincerely,



David Hanson
Redevelopment Specialist
Remediation & Redevelopment Program

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