

## Pfeiffer, Jane K - DNR

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**From:** Pfeiffer, Jane K - DNR  
**Sent:** Tuesday, March 28, 2023 3:05 PM  
**To:** Shane LaFave  
**Cc:** Que El-Amin; Jamie Luehrs; Brandon Fritz; Conyunn West; Pratap Singh; Robert Reineke; Weber, Tyler; Hedman, Curtis J - DHS  
**Subject:** RE: CWC Follow Up - 2nd and 3rd Floor Residents  
**Attachments:** 20230327\_99\_DNR\_RESPONSE\_TO\_IMMEDIATE\_ACTION\_PLAN.pdf

Hi Shane,

The DNR received the email below regarding reoccupation of the 2<sup>nd</sup> and 3<sup>rd</sup> floors at the Community Within the Corridor – East Block site. In addition to the response actions outlined in the attached 03/27/23 DNR email, DNR provides the following comments:

- The decision to reoccupy any portion of the site building will be based on assessment results. Recommendations for re-occupancy will be considered as additional data is collected and re-occupancy plans are developed. Details regarding the planned re-occupancy process including what units will be occupied, routes of entry/exit, and measures to restrict certain areas should be provided as re-occupancy plans are developed.
- Your email below suggests utilizing the portable gas chromatograph to conduct one additional round of indoor air sampling on the 2<sup>nd</sup> and 3<sup>rd</sup> floors to determine whether re-occupancy of these floors is appropriate. The gas chromatograph analysis proposed in the email below will not be sufficient to determine whether re-occupancy of the 2<sup>nd</sup> and 3<sup>rd</sup> floors is appropriate. Many of the previous indoor air samples collected on these floors were not collected in residential living spaces. Additionally, the portable gas chromatograph sample results provide information regarding indoor air conditions at the time of sampling and do not account for potential variations over time.
- In addition to the portable gas chromatograph sampling proposed below, to determine whether re-occupancy of the 2<sup>nd</sup> and 3<sup>rd</sup> floors is appropriate, collect indoor air samples for lab analysis to assess the indoor air throughout the 2<sup>nd</sup> and 3<sup>rd</sup> floors, including common spaces and **each apartment unit**. The DNR recommends utilizing various overlapping sample durations (e.g. 24 hour samples and 7-14 day samples).
- In addition to utilizing the gas chromatograph to collect indoor air samples on the 2<sup>nd</sup> and 3<sup>rd</sup> floors as proposed in the email below, the DNR recommends utilizing the portable gas chromatograph to identify vapor intrusion entry pathways and inform vapor mitigation system optimization activities.
- It is the DNR's understanding that temporary ventilation has been implemented at the site. Temporary ventilation should cease a minimum of 24 hours prior to assessment activities. Sampling to determine whether re-occupancy is appropriate should be conducted under normal building operating conditions.
- The DNR recommends retaining a National Radon Proficiency Program certified radon mitigation specialist that is experienced in vapor intrusion within multi-family residential units to assist with vapor mitigation system modifications.
- Pressure field extension testing results provided by K. Singh in a March 24, 2023, email indicate insufficient sub-slab depressurization in multiple areas across the site building. Vapor mitigation system modifications to achieve adequate sub-slab depressurization should be completed. Additional pressure field extension testing will be necessary to demonstrate adequate sub-slab depressurization.
- Reference the DNR guidance document, [Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin \(RR-800\)](#), and DNR Issues & Trends: Passive Air Sampling for Vapor Intrusion webinar([https://widnr.widen.net/s/cbnknd2vgb/rr\\_issuesandtrends\\_20221116](https://widnr.widen.net/s/cbnknd2vgb/rr_issuesandtrends_20221116)) for guidance regarding vapor intrusion investigation and mitigation.

Present the results of the activities described above immediately following the receipt of data.

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Jane Pfeiffer

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**From:** Shane LaFave <Shane@roerscompanies.com>

**Sent:** Monday, March 27, 2023 9:13 PM

**To:** Pfeiffer, Jane K - DNR <jane.pfeiffer@wisconsin.gov>; tyweber@milwaukee.gov

**Cc:** Que El-Amin <que@scott-crawford.com>; Jamie Luehrs <jamie@roerscompanies.com>; Brandon Fritz <Brandon.fritz@roerscompanies.com>; Conyunn West <conyunn.west@roerscompanies.com>; Pratap Singh <psingh@ksinghengineering.com>; Robert Reineke <rreineke@ksinghengineering.com>

**Subject:** CWC Follow Up - 2nd and 3rd Floor Residents

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Tyler and Jane,

Following up on the group call earlier this afternoon, I believe we all want to work for the best interest of the families that are experiencing unexpected temporary relocation from their homes and disruption of their lives. What I heard from Jennifer Borski on the call is that we can try and tackle the low hanging fruit first, which in this case is the 2<sup>nd</sup> and 3<sup>rd</sup> floors, and get people moved back into those areas and back to their normal lives.

To that end, in looking at the air test results (attached for reference) from last week, pages 5 and 6 contain a map of all the test areas with each test indicated by a red circle, with the exceedances showing test results in bold lettering and the area shaded in red. On 3<sup>rd</sup> floor, there was only 1 exceedance (a 4.0), and it was in the stairwell. On 2<sup>nd</sup> floor, there were 3 exceedances (a 4.6, a 4.2, and a 2.7). Of the 3, one was in that same stairwell from 3<sup>rd</sup> floor, and the other 2 were in a hallway outside that stairwell. There were no exceedances in any actual apartments on 2<sup>nd</sup> and 3<sup>rd</sup> floor.

As mentioned on the call, we will continue correction efforts this week (further details will be provided by KSingh per your request) and we will have the Hartman team on site starting Thursday this week with a portable gas chromatograph to collect real-time indoor air data. Testing on the 3<sup>rd</sup> and 2<sup>nd</sup> floors will be our priority. Assuming we get clean test results, that would then be two points of data indicating those areas on 2<sup>nd</sup> and 3<sup>rd</sup> floor are safe. If desired, we could also take the step of working with KSingh to seal off that stairwell and hallway that previously had exceedances. In the interest of restoring people's normal lives, we think it would then be appropriate to move people back into their 2<sup>nd</sup> and 3<sup>rd</sup> floor homes. There are multiple other stairwells and multiple elevators that can take them in and out of the building without needing to pass through any areas that had exceedances, such that safe ingress and egress to their homes is assured.

We will still continue to work on the other areas with higher levels/frequency of exceedances throughout this process, but it seems unnecessary to have those residents who live in unaffected areas have to continue to go through such disruption. We believe that it is not in the best interests of our residents to impact their lives beyond what is necessary from the standpoint of health and safety. We should make every effort to tailor this process to the acute needs involved.

Please review and let us know if you would be amenable to this approach.

Thanks,

**Shane LaFave**

Sr. Vice President of Development

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