

Pfeiffer, Jane K - DNR

From: Pfeiffer, Jane K - DNR
Sent: Thursday, April 6, 2023 12:15 PM
To: Shane LaFave; Que El-Amin; Robert Reineke; Pratap Singh
Cc: Hoverman, Robert R - DNR; Mylotta, Pamela A - DNR
Subject: Community Within the Corridor - East Block (02-41-263675) - 04/05/23 Meeting Follow-Up

Follow Up Flag: Follow up
Flag Status: Completed

Greetings,

Thank you all for taking the time to virtually meet yesterday (04/05/23) to discuss the above-referenced site. As discussed during the meeting, based on the currently available information and observations made during the DNR's site visits on 03/30/23 and 03/31/23, the DNR provides the following feedback to help to prevent vapor intrusion at the site building:

- During the site visit, the DNR observed that the exhaust pipe connected to the southern blower of the soil vapor extraction/vapor mitigation system (VMS) terminated approximately 4 feet above the ground surface. Modify the VMS so that the exhaust piping terminates above the roofline and away from potential points of reentry into the building, as detailed in DNR's guidance document RR-800, *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin*.
- During the site visit, the DNR observed that the VMS located in the mechanical room north of the garage was not active, a fan was not yet installed, and the drop point/suction pit was not sealed. Seal the drop point/suction pit and activate the VMS.
- During the site visit, the DNR observed that the sump located in the mechanical room north of the parking garage was sealed with tape. The sump must be sealed in a more permanent manner, to the extent possible, without compromising the water control capabilities of the sump and in a manner that allows maintenance of the sump as necessary.
- During the site visit, the DNR observed many cracks and other penetrations in the floor that could act as vapor migration pathways. Perform additional sealing activities to seal the floor slab and preferential migration pathways to the extent possible. Given the complicated nature of preferential pathways, consider how areas of greater impact behind interior walls will be evaluated for vapor migration and potentially mitigated.
- During the site visit, the DNR observed a second blower near the northern VMS blower, which was not operable at that point in time. Describe the plans for the second blower or other blowers delivered, per recent memos submitted to the DNR summarizing daily actions, and rationale for how this will increase the effectiveness of the VMS.
- Vapor mitigation at large, old buildings can be complex. The DNR ***strongly*** recommends that you hire an NRPP certified vapor intrusion mitigator with experience in mitigation of chemical vapor intrusion at large buildings.

Additional DNR feedback, as discussed in the 04/05/23 meeting:

- To-date, soil excavation and soil vapor extraction are the remedial actions that have been/are being implemented at this site. Based on the soil sample results and the concentrations of trichloroethylene (TCE) in indoor air identified to-date, additional remedial action to reduce the mass and concentration of TCE may be necessary. It is currently unclear whether the existing VMS can be modified to effectively reduce the mass and concentration of the TCE source area(s) within the remedial soil excavation limits. The DNR recommends that you consider implementing additional remedial actions. Additional remedial actions to consider include, but are

not limited to, targeted soil vapor extraction with dewatering for observed conditions, additional soil excavation, or injections in this area.

- Provide a schedule for collecting vapor effluent data for determining mass removal from the VMS. Incorporate this information into your timeline and consideration for additional remedial action(s).
- The DNR understands that on 03/25/23, the Community Within the Corridor, Limited Partnership (CWC) provided formal written notification of the indoor air data, which was presented to the DNR on 03/23/23, to the occupants of the Community Within the Corridor East Block. These notifications are required under Wis. Admin. Code § NR 714.07. On March 24, 2023, the DNR requested via email that CWC provide contact information (name, email address, and phone number) for the tenants, as well as documentation that CWC has provided notification to them. Please provide copies of the notifications to DNR as soon as possible and include information on whether each tenant was using the building for residential or commercial purposes.
 - During the subject meeting you informed the DNR that there is a commercial tenant that stores items at a building outside of the site limits. Provide a map clearly showing where this commercial tenant space is located. Confirm the address of this commercial space.
- The DNR understands that water is being actively purged from the VMS and is being containerized on-site. The DNR also understands the water is or will be lab analyzed for volatile organic compounds before disposal actions are taken. Lab data sheets for the water analysis must be submitted to the DNR within 10 days of receiving the data, per Wis. Admin. Code § NR 716.14. Further, responsible parties shall manage investigative wastes in a manner that will not pose a threat to public health, safety, or welfare or the environment, and which is consistent with state and federal regulations, per Wis. Admin. Code § NR 716.11(6).

Per the Emergency Order, document these actions and this additional information in the weekly summary reports that are due every Monday by 4PM. Please do not hesitate to reach out with any questions you might have.

Thank you, Jane

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