

## Pfeiffer, Jane K - DNR

---

**From:** Shane LaFave <Shane@roerscompanies.com>  
**Sent:** Friday, April 21, 2023 3:58 PM  
**To:** Pfeiffer, Jane K - DNR  
**Cc:** Lauren.Harpke@quarles.com; Que El-Amin; Pratap Singh; Robert Reineke; Sieger, Christine T - DNR; Mylotta, Pamela A - DNR; Hoverman, Robert R - DNR; Sparks, Craig C - DNR; Hughes, Audra A - DNR; Robert Fedorchak; Lara Page  
**Subject:** RE: Community Within the Corridor - East Block (02-41-263675) - Emergency Order Correspondence

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**CAUTION: This email originated from outside the organization.  
Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Jane,

Thank you for the opportunity to supplement our responses to the DNR's Emergency Order, as requested in your email of April 13, 2023. Upon receipt, CWC requested our environmental consultant, K. Singh & Associates, Inc. (KSingh) to prepare written responses to the technical requests. That information is included in the link below:

link:  [20230420 - CWC EB VMS As-Builts.pdf](#)

Most notably, the response includes preliminary as-built drawings for the vapor mitigation system as requested.

After discussions with KSingh regarding the attached memorandum, we wanted to provide additional color on certain requested documents:

1. We do not have information necessary to prepare the detailed E-W and N-S cross sections of the vapor mitigation system in Building 1B as requested in the Department's April 4, 2023 email because proper design and construction of the system did not require preparation of cross-sectional information. For your reference, however, KSingh has prepared and included a typical cross section of the system. Additional contextual information regarding soil type and groundwater depth in the area are included in the April 7, 2023, Response to the Emergency Order memorandum, prepared by KSingh.
2. We are not currently able to provide maps showing pressure field extension measurement and air flow reading location, as KSingh has been dedicating their time to identifying the cause of vacuum pressure concerns in the TCE exceedances areas.
3. We have confirmed with KSingh that the vapor barrier location is the same as the hot spot removal locations. (See also pp. 13-14 of the Interim Remedial Action Documentation Report for additional discussion.) Please treat this communication as confirmation that you can rely on the "Hot Spot Removal Area" on the Interim RADR report figures to also represent the vapor barrier locations.

The remaining items requested by DNR in Emergency Order Section III.1 have been provided in this and our previous submittals, including the preliminary as-builts, a typical cross section, confirmation that vapor barriers were installed in same locations as hot spot removal, various figures and specifications for vapor mitigation system components installed

to-date, explanation of minor changes to vapor mitigation design plans, status of vapor mitigation system completion, plan sheets and drawings, results of pilot tests, and additional information on fans, blowers, and valves.

Finally, we would ask that the DNR entertain a meeting with CWC representatives and KSingh for Monday, April 24th at 11:00am or 2:30pm to discuss the various requests and submittals. The scope of material and turnaround times requested by the Department for the documentation requests have been onerous. We would greatly appreciate the opportunity to cooperatively discuss the various outstanding items and ultimately find a timetable agreeable to all parties to get the relevant information completed quickly but also in a manner that balances the large number of urgent tasks being conducted by KSingh and CWC onsite to physically address the underlying vapor concerns necessary to get our residents back in their homes. We would request this meeting also include discussion of a mutually-agreed upon revised deadline and approach for preparation of the requested comprehensive data tables and figures which, as explained in KSingh's forthcoming separate email to the Department today, we will not be able to complete by Monday, April 24th.

Please contact me with any questions.

### Shane LaFave

Sr. Vice President of Development

m: 763.300.1861

[shane@roerscompanies.com](mailto:shane@roerscompanies.com)

---

**From:** Pfeiffer, Jane K - DNR <jane.pfeiffer@wisconsin.gov>

**Sent:** Thursday, April 13, 2023 11:57 AM

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

**Cc:** Lauren.Harpke@quarles.com; Que El-Amin <que@scott-crawford.com>; Pratap Singh <psingh@ksinghengineering.com>; Robert Reineke <rreineke@ksinghengineering.com>; Sieger, Christine T - DNR <christine.sieger@wisconsin.gov>; Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>; Hoverman, Robert R - DNR <robert.hoverman@wisconsin.gov>; Sparks, Craig C - DNR <Craig.Sparks@wisconsin.gov>; Hughes, Audra A - DNR <audra.hughes@wisconsin.gov>

**Subject:** Community Within the Corridor - East Block (02-41-263675) - Emergency Order Correspondence

Greetings Shane,

On 04/07/23, the DNR received *Response to Emergency Order for Community Within the Corridor East Block* (the Report), dated 04/06/23, for the above-referenced site. The Report was provided to respond to paragraphs 1 and 2 of Section III of the Emergency Order (attached).

The Report indicates that Greenfire is the subcontractor that installed the VMS and that the as-built drawings for the VMS are not currently available, which were required under the Emergency Order. Additionally, the Report indicates that the extent of the vapor barrier installation was limited to the hotspot soil excavation areas, but these areas are not labeled on a map. Lastly, the Report did not include the cross sections as outlined in the 04/04/23 DNR email (attached).

**Provide the as-built map(s), cross sections, map(s) showing vapor barrier location(s), and a complete response to paragraph 1 of Section III of the Emergency Order, as clarified by the DNR in the 04/04/23 email, no later than 04/21/23.** Please be aware that if Community Within the Corridor Limited Partnership does not provide the documentation required by the Emergency Order, the DNR may consider proceeding with enforcement, as provided under Wis. Stat. chs. 292 and 299.

As a reminder, please continue to review and implement the requirements in Wis. Admin. Code ch. NR 712, which provides minimum standards of experience and professional qualifications for persons who perform and provide certain services or scientific evaluations associated with environmental response actions.

The feedback provided above is specific to paragraphs 1 and 2 of Section III of the Emergency Order. The Wis. Admin. Code NR 700 process must still be completed following the implementation of the interim actions with respect to the vapor assessment and mitigation efforts.

Please reach out should you have any questions.

Thank you, Jane

**We are committed to service excellence.**

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

**Jane K. Pfeiffer**

Hydrogeologist - Remediation & Redevelopment Program

Wisconsin Department of Natural Resources

Phone: (414) 435-8021

[jane.pfeiffer@wisconsin.gov](mailto:jane.pfeiffer@wisconsin.gov)

