



WISCONSIN DEPARTMENT  
of HEALTH SERVICES



June 7, 2023

Dear CWC East Block Residents,

The Wisconsin Department of Natural Resources (DNR), Wisconsin Department of Health Services (DHS), and the City of Milwaukee's Health Department and Department of Neighborhood Services are working together to review information for the Community Within the Corridor (CWC) East Block environmental contamination site. Below is a summary of the status update. On the next page is a letter from DNR, DHS, and the City of Milwaukee with additional information.

#### Status Reminder:

- The CWC East Block is currently under an emergency order issued by the DNR on March 31, 2023, which requires that certain actions be taken by CWC.
- The CWC East Block is currently under a public health order that was issued by the City of Milwaukee on March 25, 2023.
- The City of Milwaukee will be relying on DNR and DHS review of data and human health risk assessment to inform their decision to lift their public health order.

#### What Comes Next?

- At CWC East Block, under Wisconsin laws and DNR administrative rules, CWC is responsible to:
  1. Perform cleanup of the environmental contamination.
    - CWC has removed some contaminated soil beneath the CWC East Block building. However, soil contamination still remains beneath the building.
    - The DNR informed CWC on June 7, 2023, that they must evaluate additional cleanup options. CWC must submit a report to the DNR presenting additional cleanup options as soon as feasible. Some cleanup options could take longer than others.
  2. Install a system at the CWC East Block building that prevents indoor air contamination and protects public health.
    - CWC is currently working to adjust the existing system to make sure it works properly.
    - CWC is working to seal cracks, holes, and other building features to prevent contaminated air from entering the building.
  3. Collect data that shows that the system is working to stop indoor air contamination.
    - Several data collection events must happen to show that the system is operating effectively.
    - One data collection event is likely needed in winter months when the heat is running in the building. This means that CWC may not be completed with the work to show the system is working properly until Winter 2023/2024 (or later).
- The work being done by CWC is necessary to prevent air contamination from entering the CWC East Block building, and to show that the system will be protective of public health.
- The DNR will continue to communicate closely with DHS and the City of Milwaukee to keep them informed of actions taken and information provided by CWC.



June 7, 2023

Dear CWC East Block Residents:

The Wisconsin Department of Natural Resources (DNR), Wisconsin Department of Health Services (DHS), and the City of Milwaukee's Health Department and Department of Neighborhood Services can only begin to understand the hardships and challenges you are facing due to your displacement because of the environmental contamination within the East Block of the Community within the Corridor (CWC). Collectively, we know all of you want to return to your homes. We are working collaboratively to ensure that when you return to your home, the work conducted in the East Block and the vapor mitigation system installed by the party responsible for investigating and cleaning up the contamination - CWC, LP (comprised of the Roers Company, Scott Crawford, Inc, and other partners) and its environmental consultant, K. Singh & Associates, Inc., will effectively address the environmental contamination issues.

In the interest of full transparency, we are providing you this status update so you are aware of the environmental work that is being, or will be, conducted in the CWC East Block, additional required evaluation of clean-up options, and an estimate of when work may be completed to address the environmental contamination in the building. At this time, our best estimate is that the necessary cleanup efforts may not be successfully completed by CWC, LP and K. Singh & Associates, Inc. until winter 2023/2024.

#### **Potential Vapor Mitigation Timeline For CWC East Block**

Because of the vapor intrusion (the movement of chemical vapors from contaminated soil into the building's indoor air), along with site-specific conditions present at the CWC East Block site, the DNR cannot provide an exact timeline for how long it will take for the responsible party (CWC, LP) to successfully demonstrate that trichloroethene (TCE) contamination is not migrating into the indoor air of the CWC East Block building. High levels of TCE in the soil and in the vapor beneath the building; the structural complexity of this large, historically industrial building; and the limited efficacy of vapor mitigation system (VMS) installed thus far, are significant contributing factors for how long it may take to complete the work and demonstrate that building conditions are protective of public health.

Another reason the DNR cannot provide an exact timeline for completion of the work is that mitigation actions are the responsibility of, and conducted by, the CWC, LP. While CWC, LP is in the process of taking corrective actions to modify the existing vapor mitigation system, contaminants continue to be detected in the indoor air at concentrations that significantly exceed the vapor action level (VAL) for TCE, which poses short- and long-term human health risks.

Ultimately, CWC, LP is responsible to complete the following vapor intrusion mitigation efforts at the East Block of CWC:

1. CWC, LP will need to design and install an effective vapor mitigation system that prevents chemical vapors from entering the indoor air. This includes completing building modifications such as sealing sump pumps, cracks, holes, and other points of vapor entry; modifications to P-traps (which are specialized plumbing fittings that create barriers which stop or contain vapors and odors) or cracked plumbing; and the removal of contaminated building materials, among other construction improvements.
2. CWC, LP will need to demonstrate, through testing, that vapor pathways have been, and will continue to be, eliminated, or permanently mitigated to levels considered protective of human health (i.e., below the vapor action level) and that the source of chemical vapor intrusion into the building has been adequately addressed.

### **CWC Must Evaluate Options For Additional Site Cleanup**

In the case of this particular environmental cleanup, which involves vapor contamination, the goal is to decrease the amount of the contamination so that the vapors beneath the building and in indoor air decrease as much as possible. TCE, along with other contaminants of concern, have been identified by CWC, LP in the CWC East Block at levels greater than what is considered protective of human health, which means that environmental cleanup is required.

While CWC, LP and K. Singh & Associates, Inc. have excavated some contaminated soil from beneath the CWC East Block building, based on environmental data submitted since March 2023, the DNR has determined that CWC, LP must evaluate additional options for environmental cleanup of the CWC East Block. This could include more soil excavation beneath the CWC East Block. On June 7, 2023, DNR issued a letter to CWC, LP stating that additional evaluation of cleanup options is necessary. Accordingly, CWC, LP will need to submit a report to the DNR within 60 days providing, among other information, what additional clean-up options exist; its preferred clean-up option; and a schedule for implementing its preferred option.

The DNR will then review and provide feedback on the report. Ultimately, CWC, LP is responsible for performing this environmental cleanup and must consider all available clean-up options. Performing additional environmental clean-up may impact the overall timeline to demonstrate successful vapor mitigation at CWC East Block. The expectation is that performing additional environmental clean-up will also increase the likelihood of the long-term effectiveness of the vapor mitigation system in preventing vapor intrusion into the building.

### **Corrections To Vapor Mitigation System**

In addition to evaluating additional cleanup actions, CWC, LP and K. Singh & Associates, Inc. are identifying issues with the existing vapor mitigation system and taking actions to correct its mitigation strategy to ensure the system protects human health. Once any additional environmental cleanup is performed and the vapor mitigation system corrective actions appear to be complete, CWC, LP will conduct multiple rounds of testing to demonstrate that the vapor mitigation system is preventing, and will continue to prevent, contaminants from entering the indoor air. These assessment periods are commonly referred to as “commissioning.”

Commissioning typically includes both indoor air sampling and testing the vapor mitigation system, which includes measurement of the pressure field extension. Pressure field extension is a measurement of the air pressure under the building floor that ensures the vapor mitigation system is adequately removing contaminated vapors from beneath the building and moving them to outdoor air. To illustrate why this is important, imagine a room with a floor fully covered with water. To have a dry room, you need a drain that empties all the water rather than just some of it. Similarly, to show building conditions are protective of public health, CWC must demonstrate that the vapor mitigation system is adequately removing contaminated vapors from beneath the entire building.

The vapor mitigation system commissioning process may take CWC, LP and K. Singh & Associates, Inc. several months to more than a year to complete, depending on site conditions and whether the responsible party, CWC, LP, must further modify the vapor mitigation system to demonstrate its effectiveness. Given the site-specific conditions present at the CWC East Block, the responsible party will need to take the following actions to demonstrate the vapor pathways have been, and will continue to be, permanently eliminated or mitigated to the extent practicable to comply with the DNR's Emergency Order issued to CWC on March 31, 2023, and applicable requirements in Wis. Admin. Code chs. NR 700-754:

1. Verification Sampling: Prior to the commissioning process, verification sampling should be performed to show that the vapor mitigation system is preventing contaminants from entering the air. This verification sampling should include indoor air sampling and should occur during, and immediately following, the implementation of the corrective actions to the vapor mitigation system. The responsible party is currently implementing these corrective actions and is monitoring indoor air. This monitoring data is presented by the responsible party to the DNR in weekly progress reports.
2. Perform Commissioning Events: The amount of time that commissioning will take is dependent on the actions taken by the responsible party and whether these actions demonstrate that the vapor mitigation system is operating and will continue to operate as intended. Several consecutive commissioning periods are necessary to show that there are no vapor action level exceedances, and the pressure field extension measurements are adequate to demonstrate that the vapor mitigation system is effectively protecting human health.
3. Evaluate Seasonal Variability: It is a generally accepted scientific principle that the concentrations of contaminants in indoor air due to vapor intrusion can vary significantly over time, and the potential for contaminated vapor entering the building is greatest during the winter heating months. Commissioning typically includes at least one event during the winter heating season when heated air rises and pulls vapors up into the building. This means that commissioning events performed by CWC may need to occur during the winter 2023/2024 – until it can be demonstrated that conditions will remain protective during times when the potential for vapor intrusion is greatest.

Commissioning is an iterative process that involves repeat testing to confirm results and adjusting the vapor mitigation system and taking other corrective actions as needed. If vapor data is above the vapor action level or if pressure field extension measurements are not adequate for a given commissioning period, it may be necessary for the responsible party to take additional corrective actions (e.g.,

additional building sealing or modifications to the vapor mitigation system) and restart the commissioning process.

The DNR will continue to work with its partners at Department of Health Services (DHS) and the city of Milwaukee to review the data and information presented concerning the status of this site. The DNR maintains a database, Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW), that may be accessed by the public and contains information about all open and closed environmental sites. You may access information on the CWC East Block site by visiting <https://dnr.wi.gov/botw> and searching "02-41-263675" in the BRRTS No. field.

#### **Input from the Wisconsin Department of Health Services:**

DHS is reviewing results from ongoing testing being performed by K. Singh & Associates. TCE concentrations in indoor air reported to date remain many times above DNR's vapor action level (VAL) of 2.1 µg/m<sup>3</sup> in the CWC East Block building. Long-term and/or repeated exposures to TCE at these levels could make the following health problems more likely:

- Cancers such as Kidney, non-Hodgkin's Lymphoma, and Liver
- Liver Effects
- Kidney Effects
- Immune and Lymphatic System Effects

Children may be more sensitive to the effects of TCE. A major concern regarding inhalation of TCE above the VAL is its potential effect on unborn babies. These effects may include:

- Fetal Heart Malformation
- Low Birth Weights
- Miscarriage

The effects on fetal heart development can occur early in pregnancy, sometimes before a woman may know she is pregnant. More information on the health effects of TCE can be found on the DHS [TCE in the Air](#) fact sheet or ATSDR's [TCE ToxFAQs](#) fact sheet.

#### **Input from the City of Milwaukee:**

The CWC East Block is currently under a public health order that has been issued by the City of Milwaukee Health Commissioner's Office, and the Health Commissioner will be relying on DNR and DHS review of data and human health risk assessment to inform the decision to lift the public health order. In the meantime, DHS continues to work closely with City of Milwaukee partners to ensure affected tenants have access to critical services and public health resources. You may access information from the City of Milwaukee by visiting: <https://city.milwaukee.gov/Health/Information/Resources-for-Residents-about-TCE>

**Point of contact for health order/occupancy questions:** City of Milwaukee, Nick Tomaro, (414) 336-8039, [ntomar@milwaukee.gov](mailto:ntomar@milwaukee.gov)

**Point of contact for public health questions:** Wisconsin Department of Health Services, Curtis Hedman, (608) 287-4152, [curtis.hedman@dhs.wisconsin.gov](mailto:curtis.hedman@dhs.wisconsin.gov)

**Point of contact for technical questions:** Wisconsin Department of Natural Resources, Jane Pfeiffer, (414) 435-8021, [jane.pfeiffer@wisconsin.gov](mailto:jane.pfeiffer@wisconsin.gov)