State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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September 9, 2011

TOWER AUTOMOTIVE
3533 N 27TH ST
MILWAUKEE, WI 53216

Subject: Reminder to Evaluate Vapor Intrusion Pathways for:
TOWER AUTOMOTIVE PRODUCTS INC
BRRTS #: 02-41-535698, FID: 241304360

Greetings:

This letter is being sent to all Responsible Parties (RP's) that currently have an open contamination site on the DNR's Bureau for Remediation and Redevelopment Tracking System (BRRTS). **The purpose is to remind RP's to assess the vapor intrusion pathway as early in the cleanup process as possible, preferably during the site investigation phase.**

Chapter NR 716, Wisconsin Administrative Code outlines the requirements for investigation of contamination in the environment. Specifically, s. NR 716.11(3)(a) requires that the field investigation determine the "nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in **all** affected media". In addition, section 716.11(5) specifies that the field investigation include an evaluation of the "pathways for migration of the contamination, including drainage improvements, utility corridors, bedrock and permeable material or soil along which **vapors**, free product or contaminated water may flow".

While many RP's and their consultants have been assessing the vapor intrusion pathway, there have been a number of situations where this pathway had not been evaluated at the time a case closure request was submitted. In some cases this resulted in the need for additional field work which ultimately delayed case closure.

In order to ensure the vapor intrusion pathway was evaluated, you need to include documentation with the Site Investigation Report that explains how the assessment was done and why the pathway was ruled out. **If the pathway cannot be ruled out, then investigation and, if appropriate, remedial action must be taken to address the risk presented prior to submitting the site for closure.** The Department can provide technical assistance at any point throughout the investigation and cleanup process for a fee. These services can be requested using the form available at: http://dnr.wi.gov/aw/rr/Services_Fees/index.htm#form. Checking in early can help save time and money during the cleanup process.

The DNR has developed guidance to help RP's and their consultants comply with the requirements described above. The guidance includes a detailed explanation of how to assess the vapor intrusion pathway and provides criteria which identify when an investigation is necessary. The guidance is available at: http://dnr.wi.gov/org/aw/rr/archives/pubs/RR800.pdf.

If you have any questions regarding this letter, please do not hesitate to contact your DNR project manager:

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Sincerely,

Mark F. Giesfeldt, Bureau Director