Feeney, John M - DNR

From: Bonniwell, Chris <CHRIS.BONNIWELL@tetratech.com>
Sent: Friday, August 2, 2024 1:45 PM
To: Feeney, John M - DNR
Cc: Lauzon, Connor
Subject: RE: Initial Comments on VMS Commissioning Plan for Trails Edge Apartments, TIF 12, BRRTS #: 02-67-554753
Attachments: SG pipes_looking N.jpg

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.

John,

Sorry for the delay on responding to this but I need to review some things and confer with my client. Please see responses to comments below. Let me know if you would like to discuss.

Have a great weekend!

Chris

Chris Bonniwell, Ph.D., LPG | Midwest Principal Account Manager
Business **+1 (262) 792-1282** | Mobile **+1 (262) 202-7393** | chris.bonniwell@tetratech.com

Tetra Tech | *Leading with Science®*
13555 Bishops Court, Ste 201, Brookfield, WI 53005 | tetratech.com

Climate positive and carbon negative by 2030. Read more

This message, including any attachments, may include privileged, confidential and/or inside information. Any distribution or use of this communication by anyone other than the intended recipient is strictly prohibited and may be unlawful. If you are not the intended recipient, please notify the sender by replying to this message and then delete it from your system.

From: Feeney, John M - DNR <JohnM.Feeney@wisconsin.gov>
Sent: Wednesday, July 10, 2024 8:48 AM
To: Bonniwell, Chris <CHRIS.BONNIWELL@tetratech.com>
Subject: Initial Comments on VMS Commissioning Plan for Trails Edge Apartments, TIF 12, BRRTS #: 02-67-554753

Hi Chris. The DNR reviewed the May 16, 2024 commissioning plan for Trails Edge Apartments. We have some initial comments, questions, and requests for information:

1. The submittal should include a PE signature.
    - PE signature is being added to revised document.
2. Regarding the cleanout vapor samples, where are the cleanouts located and where do they lead to?

- The facility runs vertical sewer lines through the basement garage that connect to the overlying tenant units above. Each vertical run then connects to the primary sewer conduit beneath the slab of the garage. Vertical pipe runs are associated with each of the 41 structural pillars in the basement garage, each of which is equipped with a sewer cleanout (see attached picture). Each vertical run then connects directly (i.e. no trap) to the primary sewer conduit beneath the slab of the garage and are thus in direct communication with and representative of gases within the primary conduit. Two locations of sewer cleanouts were selected to represent the northern and southern portions of the building.

3. Provide an explanation for why no in-unit indoor air (IA) samples are proposed.
   - As discussed with the WDNR prior to the development of the commissioning plan and performance of indoor sampling, in-unit sampling was not performed to avoid complications with access agreements and changing occupancy status. The common space indoor air sampling locations along the hallway were agreed to be representative. The sampling plan did include the addition of the building management office space as representative of an enclosed unit. In the WDNR email dated 3/11/24 from Joe Martinez, unit samples were specifically discussed as stated…"*If in unit samples are not collected, then at a minimum we recommend sampling of the sanitary cleanout(s) along with the locations you proposed below and evaluate the results to determine if in unit samples are warranted.*" The collected sewer gas samples do not exceed applicable screening criteria warranting unit assessments.

4. Clarify how many more rounds of pressure field extension (PFE) and IA testing are planned.
   - A total of three rounds of indoor air and PFE assessments are proposed, which is consistent with RR-800 guidance. Section 3.0 of the Commissioning Plan calls for three events measuring the PFE, indoor air, and sewer gas. The timing of the first two events was specifically identified in Section 3.0 of the Commissioning Plan. The first was performed in late March (completed 4/1/24) to represent winter weather conditions. The second was recently completed in late June (6/27 – 7/5) to represent the period historically determined to represent high groundwater conditions for the area (See Appendix D). The third event was not specified other than to occur within a six month period, which corresponds to September-October of 2024.

5. The DNR requests that the expansion joint in the garage be sealed before the next round of PFE testing occurs. Provide an explanation of how the sealing is conducted and justification for why it will not fail again. Discuss how it will be maintained. Documentation of the expansion joint sealing will be required.
   - Repair of the expansion joints was requested of the facility maintenance staff and was performed in May 2024. Indoor air sampling was performed prior to receipt of the comments. The PFE measurements were assessed after the sampling event. The results will be submitted with the collected analytical results.
   - Sealing is conducted by the application of polyurethane caulk to open expansion joints where visible. Initial caulking was found to wear in areas of heavy traffic or in areas where the joint was small.
   - Section 3.1 of the OM&M plan (Item 10) calls for the inspection and repair of caulked joints. In the event that small joints are too small to accept sufficient caulk to maintain cohesion, grooving of the joint will be recommended to allow for improved application and adhesion.
   - An update of the caulking improvement is being incorporated in to the addendum.

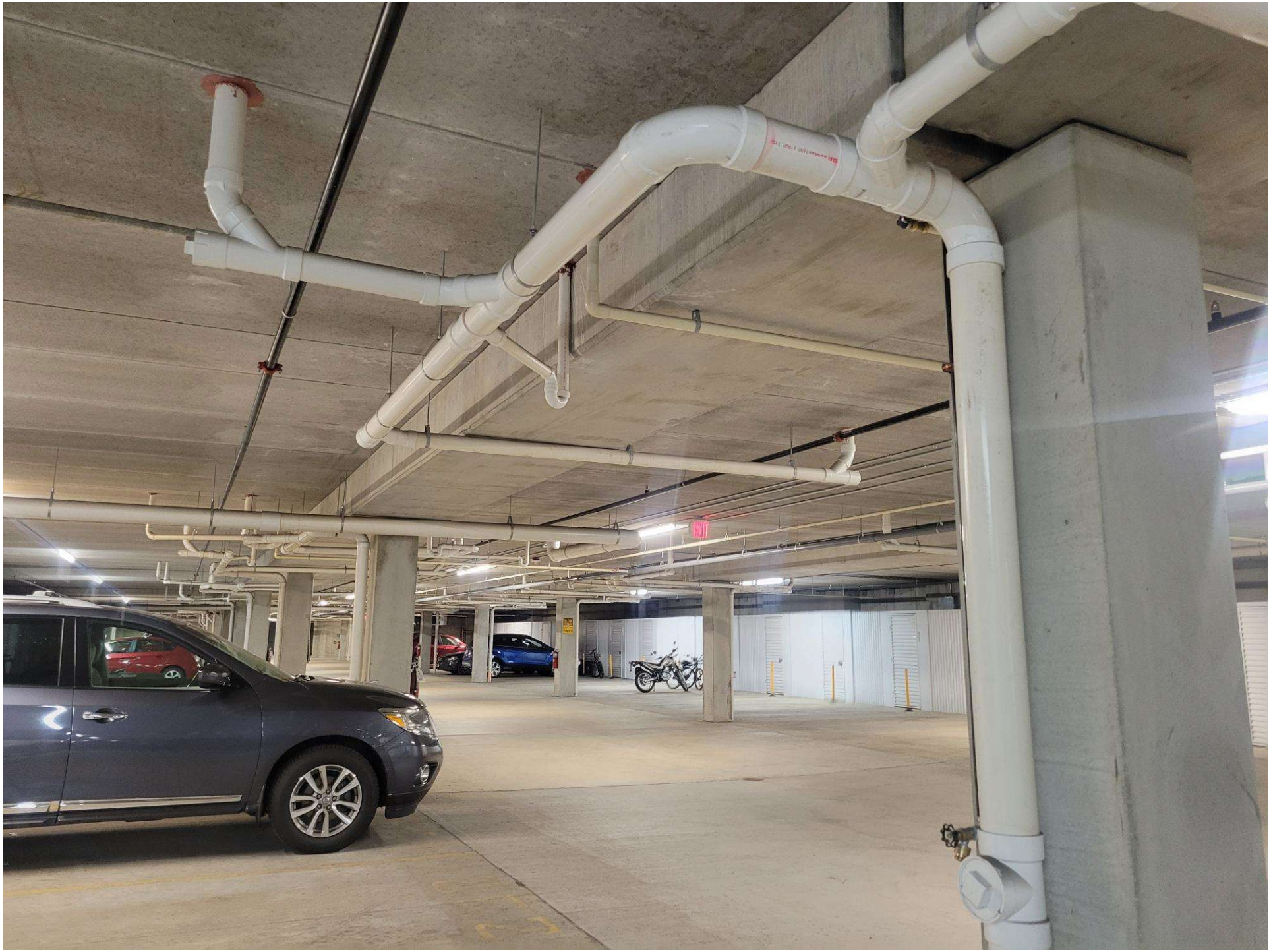
6. Three rounds of PFE testing post-repair of the expansion joint will be required.

- Three rounds of PFE testing will be performed following the most recent caulk maintenance that took place in May 2024, the first of which is the recent sampling event. These additional events will not include additional indoor air testing beyond the proposed sampling events.

7. The telemetry and backup power system components should be added to an updated OM&M Plan.
   - The telemetry and backup power system were included in the Commissioning Plan for the WDNR review and comment as the requirements for such components is a new request from the WDNR and approval of the proposed solutions was being sought.
   - The submitted OM&M plan did include details of the telemetric solution (see Section 2.3 and Appendix D) and the power backup solution (see Section 2.7 and Appendix E). Please clarify what additional information is needed for inclusion in the OM&M plan.

The DNR requests that you respond to this email with an addendum to the commissioning plan. The DNR will review the addendum under the technical assistance fee already submitted.
The addendum to the Commissioning Plan will be submitted following concurrence with or clarification of responses to the above responses.

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

John M Feeney, PG
Hydrogeologist, Remediation & Redevelopment Program
Wisconsin Department of Natural Resources
1155 Pilgrim Road, Plymouth WI 53073
Phone: 262-416-8643
johnm.feeney@wisconsin.gov

dnr.wi.gov