Amadi, Eric A - DNR

From: Martinez, Joseph J - DNR
Sent: Friday, November 22, 2024 12:44 PM
To: Michelle Peters
Cc: Melinda Dejewski; Patrick Schloss; Dave Wepking; Katlyn Nohr; Amadi, Eric A - DNR; Alessi, Timothy G - DNR
Subject: RE: BRRTS No. 02-41-594132 - VI Follow Up

Follow Up Flag: Follow up
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Hi Michelle,

The DNR has reviewed the information provided below along with the site investigation data presented to date and has determined that post-construction sub-slab sampling is not necessary provided the RP is willing to accept the industrial use restriction and future vapor risk continuing obligations at the time of closure.

This decision is based on the following:

- The only VOCs identified at the site to date are PVOCs. Vapor intrusion from PVOCs generally occurs far less frequently than CVOCs.
- Ramboll attributed PVOC contamination at the site to filling of a former creek channel. The former creek channel extends under a small portion of the proposed structure.
- The PVOCs present at the site are attributed to filling that occurred over 20 years ago. The risk of vapor intrusion from PVOCs decreases with time.
- The proposed structure will be slab on grade, PVOC contamination was not identified in shallow soil samples, and PVOC contamination is only present in samples collected near the water table.
- Based on groundwater data collected to date the PVOC contamination in groundwater is limited.
- The proposed structure will be an open garage type structure with limited occupancy.

Based on the above, the proposed redevelopment appears protective of vapor intrusion provided the industrial use restriction and future vapor risk continuing obligations are applied. Let me know if you have any questions.

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From: Michelle Peters <mpeters@ramboll.com>
Sent: Tuesday, November 19, 2024 9:19 AM

To: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>; Martinez, Joseph J - DNR <Joseph.Martinez@wisconsin.gov>; Mulcahy, Connor P - DNR <connor.mulcahy@wisconsin.gov>
Cc: Melinda Dejewski <MDejewski@westalliswi.gov>; Patrick Schloss <pschloss@westalliswi.gov>; Dave Wepking <dwepking@westalliswi.gov>; Katlyn Nohr <Katlyn.Nohr@Ramboll.com>
Subject: BRRTS No. 02-41-594132 - VI Follow Up

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All,

Thank you for your time and continued feedback on the West Allis Waste Transfer Station (WTS) site. Based on discussion during the call on November 18th, 2024, we are providing the following information regarding the cold storage structure which is proposed for construction on the West Allis WTS site.

As discussed during the meeting, Ramboll and the City of West Allis maintain that the cold storage structure proposed on the West Allis WTS property does not constitute an 'occupied building' per DNR vapor intrusion guidance document RR-800 and for which sub-slab vapor sampling would be required per Wis. Admin. Code § NR 716.11(5)(g). The cold storage structure is intended only for the storage of seasonal tools and equipment in connection with the new Department of Public Works (DPW) facility on the adjoining former Teledyne site, currently under construction. The storage structure would serve an ancillary support structure in connection with the adjacent DPW facility, and would be accessed only by DPW personnel, and only on a very limited basis to retrieve/replace equipment at seasonal changes during the year. It is understood that the Department holds concerns over whether the structure may be unintentionally occupied, despite the fact that it is intended only for equipment and tool storage. There is no reasonable expectation of human occupation in the cold storage structure, given the following characteristics of the structure:

- There will be no office areas, breakroom areas, or maintenance bays in the structure which would be routinely accessed or occupied for any length of time.
- There will further be no infrastructure which would encourage occupation of the space, such as restroom facilities or temperature control (beyond the required heating of fire control equipment).
- The newly constructed, occupied DPW building on the adjoining site will have a vapor mitigation system in place. This new DPW facility will house office areas, breakrooms, and maintenance areas with restrooms and temperature control for use by DPW personnel.
- The DPW will have full control over access to the entire DPW facility, including the proposed storage structure. The DPW campus yard areas will be gated off via access gates and card readers. The storage buildings will be managed with keyed storage locksets with specific access granted by DPW administration. Doors will be secured and not accessible unless keyed access is given.
- The City of West Allis is making significant investments into this property for development of its specifics needs and to restore the land to productive use, and therefore intends to maintain ownership and land use of the property well into the future.

As the WTS property is considered in conjunction with the adjoining DPW facility on the former Teledyne property, there is no reasonable expectation that the cold storage structure would be occupied given the intended use and characteristics of the structure and the available infrastructure elsewhere on the property. Demolition of the existing above-ground structure on the WTS property is scheduled to begin by next week, November 25th. As such, the Department's prompt response is much appreciated to keep construction of the new facilities and beneficial use of this land on schedule. If Ramboll or the City of West Allis can provide any further clarity on of the discussed items to facilitate the Department's understanding and decision, please do not hesitate to reach out.

Kind regards,
Michelle

Michelle Peters, PE*

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