State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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Milwaukee WI 53233

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March 13, 2025

Mr. Brian Cater
City of Kenosha
625 52nd Street, Room 305
Kenosha, WI 53140
Email only to: bcater@kenosha.org

Mr. Brock Portilla
KABA Foundation
5500 6th Avenue, Suite 200
Kenosha, WI
Email only to: bportilla@kaba.org

Subject: Vapor Intrusion Assessment Report for the Kenosha Unified School District at Lakeview Technology Academy
5533 30th Avenue, Kenosha
Part of the Chrysler Kenosha Main Plt site, DNR BRRTS Activity # 02-30-000327; FID # 230004500

Dear Mr. Cater,

The Wisconsin Department of Natural Resources (DNR) has reviewed the *Vapor Intrusion Assessment Report for the Kenosha Unified School District at Lakeview Technology Academy* (the Report) and made the following conclusions:

- Information regarding the design, construction, and operation of the sub-slab mitigation system (including pressure field extension readings), suggest that the system is working as intended and should interrupt the vapor intrusion pathway for as long as it operates.
- Concentrations of contaminants detected in sub-slab soil vapor samples collected under this building do not indicate a significant vapor intrusion risk. No additional sampling of sub-slab soil vapor is being requested to assess this pathway. However, due to the uncertainties regarding the presence of chlorinated VOC contamination in the vicinity of the building, the potential for vapor migration to change as other areas of the site are paved or as soil is excavated and reused, and as only two closely spaced sub-slab sampling events were conducted to investigate this pathway, the need to continuously operate the mitigation system cannot be ruled out. As the system is already installed and is operating effectively the DNR would recommend that you agree to have a continuing obligation be imposed requiring the operation of the mitigation system. Operating the system following DNR guidelines will provide an additional level of oversight that helps ensure the safety of building occupants.
- Indoor air samples must be collected to finalize the vapor intrusion investigation at this building. These samples are intended to complete the commissioning of the sub-slab mitigation system and confirm that there are no floor penetrations or other migration pathways that are not being addressed by the mitigation system. A work plan that presents the proposed sampling schedule, with details on the building layout and justification for sample placement, could be provided (with a review fee) to the DNR for review.
- An updated "Vapor Mitigation System Operation and Maintenance Plan" must be provided for DNR review. The updated plan should include better descriptions of inspection and maintenance procedures, discuss prohibited actions that can't be made without DNR prior approval (including changing or turning off the system), provide an updated discussion on commissioning efforts, include the vapor mitigation system inspection log (DNR form 4400-321), require submittal of annual inspections forms to the DNR,

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and, in general, more closely follow DNR guidance and templates. Refer to DNR guidance document *Maintenance Plans for Vapor Mitigation Systems/Vapor Intrusion Response Actions/Vapor Barriers* (RR-981) for guidance regarding development of the updated vapor mitigation system operation and maintenance plan. The KABA Foundation must provide acknowledgement to the DNR that they, as the building owner, understand that they are accepting responsibility for the operation of the mitigation system.

After the investigation of indoor air quality is complete, a Vapor Mitigation System Operation and Maintenance Plan is approved by the DNR, and the $350 database fee is provided, a continuing obligation will be imposed at this site requiring the mitigation system to operate and be inspected as outlined in the maintenance plan. The DNR understands that the building owner is currently accepting responsibility for maintaining the system and following the maintenance plan, however the legal responsibility to conduct these tasks will ultimately fall to the property owner.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me, the DNR project manager, at (414) 405-0764 or paul.grittner@wisconsin.gov.

Sincerely,

Paul Grittner
Hydrogeologist
Remediation & Redevelopment Program

cc: Tory.Schultz, AECOM – tory.schultz@aecom.com
Patrick Finnemore, Kenosha Unified School District – pfinnemo@kusd.edu