



October 6, 2023

Roers Companies
c/o: Shane LaFave
110 Cheshire Lane, Suite 120
Minnetonka, MN 55305
Via Email Only to shane@roerscompanies.com

Subject: Technical Assistance Provided - Commissioning Plan Review
Community Within the Corridor West Block, Buildings 4 & 5
3212 W. Center Street, 2727 N. 32nd Street, & 2758 N. 33rd Street, Milwaukee, WI
BRRTS #02-41-587376, FID #341333190

Dear Mr. LaFave:

On September 5, 2023, the Wisconsin Department of Natural Resources (DNR) received *Third Round Commissioning Plan* (the Report), dated August 31, 2023, prepared by K. Singh and Associates, Inc. (K. Singh) on behalf of Community Within the Corridor, Limited Partnership (CWC), for the site identified above. The Report was submitted with a technical assistance request fee of \$700 for DNR review and written response. The DNR reviewed the Report for compliance with Wisconsin Statutes (Wis. Stats.) ch. 292 and Wisconsin Administrative (Wis. Admin.) Code chs. NR 700-754. The DNR approves the commissioning plan, as presented in the Report, with comments and recommendations, as outlined below.

Report Summary

In summary, the Report proposes the following plan:

- Perform pressure field extension testing at seventeen vapor pins (SVP-17 to SVP-33) to demonstrate at least -0.004 inches H₂O under the entire ground floor slab.
- Perform indoor air sampling at eighteen locations using the portable gas chromatograph (GC) unit and at ten locations using passive samplers to demonstrate that there are no indoor air vapor action level (VAL) exceedances.
- Perform sub-slab sampling at SVP-17 to SVP-33 using the portable GC unit to show that there are no sub-slab vapor exceedances of vapor risk screening levels.
- Perform sampling of the vapor mitigation system's exhaust using the portable GC unit to demonstrate that the blower fans continue to exhaust trichloroethene (TCE). Anemometer readings will also be collected to document rate of exhaust.

DNR Review of the Report

The DNR approves the 3rd round commissioning plan presented in the Report with the following comments:

1. The DNR recommends that additional indoor air samples be collected using the portable GC unit to further evaluate the southern portion of Building 4. As suggested in Section 4 of the DNR's *Technical Assistance Provided* letter, dated May 30, 2023, the DNR recommends that additional indoor air sampling locations (using GC unit) occur in target areas where sub-slab vapor concentrations were highest (based

on data collected during the sub-slab vapor investigation that occurred prior to the VMS operations), locations with slab penetrations (i.e., bathrooms, laundry rooms, etc.). More specifically, consider adding sample locations in the conference rooms along the western side of the building, near the elevator and stairwell, and in the southwest area where sub-slab contamination was highest in concentration.

2. Attachment B of CWC’s *Second Round of Commissioning for Community Within the Corridor – West Block – Buildings 4 and 5* report, submitted to the DNR on August 24, 2023, presents pictures taken during the 2nd round commissioning event.
 - a. Pictures 1 and 2 show that the passive samplers were deployed by taping the samplers to the walls of the buildings. This method of passive sampler deployment should not be used as it does not adhere to industry best management practices. As indicated in the DNR’s May 30, 2023, letter, passive samplers should be placed a minimum of 6-inches from the wall. Include pictures showing passive sampler deployment in the future reports, as applicable.
 - b. Picture 3 shows that the VMS exhaust piping is pointing directly at the windows of Building 4. The DNR recommends that the VMS exhaust piping be updated to point away from the building’s windows and that the piping extend to at least a 45-degree angle pointing upwards to comply with industry best management practices. Include pictures showing the updated VMS exhaust piping in the future reports, as applicable.
3. Sub-slab vapor data collected during unmitigated sub-slab building conditions is used to determine whether a building has a vapor intrusion risk and whether the sub-slab must be mitigated to prevent potential vapor intrusion risk. Sub-slab vapor data collected during VMS operation is influenced by the operation of the VMS and will not be considered by the DNR during its review of the commissioning at this site.

Next Steps

In consideration of administrative code requirements, the DNR is requesting the implementation of the following schedule:

- Per Wis. Admin. Code § NR 716.14, CWC must submit all sampling results within 10 days of receiving laboratory data.
- Per Wis. Admin. Code § NR 724.15, submit a construction documentation or as-built report within 60 days after the date that construction of the remedial action is completed or determined to be essentially complete by the DNR. Per Wis. Admin. Code § 724.13(2), submit an interim operation, maintenance, and monitoring (OM&M) plan for all VMS components within the above-outlined as-built report. Prior to DNR providing approval of the VMS commissioning process for these site buildings, the as-built report must be submitted for DNR review. Given the tentative schedule presented in the Report, the DNR recommends that the as-built report be submitted alongside or immediately following the 3rd round of commissioning data. Below are additional requirements and recommendations for the as-built and OM&M plan.
 - The as-built report should include information on all site buildings (i.e., Buildings 4—8B) and a comprehensive commissioning dataset. Consider the information presented in the DNR’s October 6, 2023, *Technical Assistance Provided - Commissioning Status Review* letter for Buildings 6—8B as you prepare the comprehensive as-built and OM&M plan for this site. The as-built report must include the information specified in Wis. Admin. Code § NR 724.15(2)-(3), and the OM&M plan included in the as-built report must include the information specified in Wis. Admin. Code §§ NR 724.13(2) and 724.17, as applicable.
 - Wisconsin Admin. Code § 724.13(1)(d) provides that “[v]apor mitigation systems (VMS) and remedial actions designed to address vapor migration shall be monitored at a frequency

determined by the department, to measure whether the action taken has been effective in meeting the vapor action level.” In consideration of the site-specific conditions present at the site, including high levels of TCE in the soil beneath the building, short term exposure health risks of TCE, complexity of the building structure and VMSs, and documented exceedances of the VAL for TCE in residential buildings, the DNR has determined that CWC must monitor the VMSs on a continuous basis, as was outlined in the DNR’s May 30, 2023, *DNR Review of Revised Additional Vapor Mitigation System Commissioning Plan for Community Within the Corridor West Block* letter. Please determine and document how continuous monitoring will be achieved. It is strongly recommended that continuous monitoring of the VMSs includes audible alarms to alert building occupants of system failures as well as instrumentation, such as telemetry, to allow immediate notification of a person directly responsible for arranging repairs in the event of a system malfunction. Per Wis. Admin. Code § NR 724.13(2)(c), include a contingency plan in the OM&M plan for anticipated or potential operation and maintenance problems, including a plan for how CWC will address a loss of electrical power to the system. It is strongly recommended that a backup power system is considered to address this potential situation.

The DNR appreciates the actions you are taking to restore the environment at this site. If you have any questions concerning this site or this letter, please contact me, the DNR Project Manager, at (414) 435-8021, or by email at jane.pfeiffer@wisconsin.gov.

Sincerely,



Jane K. Pfeiffer
Project Manager – Hydrogeologist
Remediation & Redevelopment Program

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