



October 6, 2023

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

Subject: Technical Assistance Provided - Commissioning Status Review  
Community Within the Corridor West Block, Buildings 6 – 8B  
3212 W. Center Street, 2727 N. 32nd Street, & 2758 N. 33rd Street, Milwaukee, WI  
BRRTS #02-41-587376, FID #341333190

Dear Mr. LaFave:

On July 10, 2023, the Wisconsin Department of Natural Resources (DNR) received *Fifth Round of Commissioning for Community Within the Corridor – West Block – Buildings 6, 7, 8A, and 8B*, prepared by K. Singh and Associates, Inc. (K. Singh) on behalf of Community Within the Corridor, Limited Partnership (CWC), for the site identified above. On August 9, 2023, the DNR requested additional information on the sampling collection methods used during the vapor mitigation system (VMS) commissioning process. On August 28, 2023, the DNR received the requested information. On September 7, 2023, the DNR received a technical assistance request fee of \$700 for DNR review and response to the June 10, 2023, submittal. On September 15, 2023, CWC presented additional information via email on CWC's recommendations and conclusions of the commissioning status for Buildings 6 – 8B of CWC West Block (collectively, the Report). Generally, CWC asserts that commissioning is complete and that no further commissioning testing is planned for Buildings 6—8B of CWC West Block. The DNR reviewed the Report along with previously submitted reports and analytical data that pertains to the commissioning process for these buildings for compliance with Wisconsin Statutes (Wis. Stats.) ch. 292 and Wisconsin Administrative (Wis. Admin.) Code chs. NR 700-754. Considering the information presented to-date, the commissioning process for Buildings 6-8B appears to be close to completion; however, additional information and evaluation is necessary before determining whether the commissioning process is complete, as outlined below.

#### Commissioning Status Review

The DNR provides the following comments on the commissioning status of Buildings 6—8B of CWC West Block:

1. On June 5 and June 29, 2023, pressure field extension (PFE) measurements collected from vapor pin SVP-2 identified 0 inches H<sub>2</sub>O. As outlined in DNR's RR-800, *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin*, the DNR recommends that at least -0.004 inches H<sub>2</sub>O is achieved to demonstrate adequate PFE. In June 2023, adequate PFE was demonstrated at SVP-1, which is approximately 40 feet (ft) west of SVP-2. In the Report, K. Singh states that the lack of depressurization (i.e., PFE) at SVP-2 is due to its proximity to the building's outer walls. Considering the information presented on Figure 1 of the Report, K. Singh's conclusion seems reasonable. Additionally,

PFE measurements collected at SVP-1 show that PFE is being achieved in this area of the site buildings. No further PFE measurements are necessary near SVP-2.

2. On June 5 and June 29, 2023, PFE measurements collected from vapor pin SVP-11 identified 0 inches H<sub>2</sub>O. In June 2023, adequate PFE was demonstrated at SVP-13, which is approximately 70 ft south of SVP-11, and at SVP-7, which is approximately 40 ft northwest of SVP-11. In the Report, K. Singh states that the lack of depressurization (i.e., PFE) at SVP-11 is due its proximity to the building's outer walls. The DNR's May 23, 2022, *Technical Assistance Provided* letter provided approval of CWC's commissioning plan, which included demonstration that PFE is achieved throughout the entire building footprint. PFE must be documented across the entire building footprint prior to commissioning approval by the DNR. Given the gap in PFE measurements collected in proximity to SVP-11, the DNR requests additional PFE measurement(s) be collected using newly installed monitoring point(s) near SVP-11 to demonstrate that PFE is achieved in this area of the building footprint. Given the information presented to the DNR at this time, once PFE is demonstrated near SVP-11, no further PFE measurements appear necessary as a part of VMS commissioning for Buildings 6—8B of CWC West Block.
3. On September 21, 2023, the City of Milwaukee's Department of Neighborhood Services (Milwaukee DNS) provided the DNR a status update on its permitting process for CWC West Block. More specifically, Milwaukee DNS informed the DNR that HVAC system upgrades were made in Buildings 6—8B and that Milwaukee DNS is requesting that CWC re-balance the HVAC system and provide Milwaukee DNS the updated balancing report. A building's HVAC system can influence the operation of a VMS. In the below requested as-built report, include a discussion on any HVAC upgrades that were made to the building during/after the commissioning process and if and how the results of the HVAC re-balancing exercise may influence CWC's evaluation of the VMS operation for these buildings. CWC should review the results of the HVAC re-balancing and determine whether any additional PFE measurements should be collected. Discuss and provide rationale for the determination in the below-outlined as-built report.
4. Indoor air data for trichloroethene (TCE) has been less than the vapor action level (VAL) for the last three commissioning events, which occurred in December 2022, February 2023, and June 2023. Given this indoor air data, no further indoor air sampling is necessary as a part of the VMS commissioning for Buildings 6—8B of CWC West Block.

#### 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 business 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. 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, per Wis. Admin. Code § NR 724.07(1). The DNR recommends that the as-built report be submitted alongside or immediately following the 3<sup>rd</sup> round of commissioning data for Buildings 4 & 5. 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 for all site buildings. Consider the information presented

- in the DNR’s October 6, 2023, *Technical Assistance Provided - Commissioning Plan Review* letter for Buildings 4 & 5 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 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](mailto:jane.pfeiffer@wisconsin.gov).

Sincerely,



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

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