



November 13, 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 – Review of Third Round of Commissioning Community Within the Corridor West Block, Buildings 4 and 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 November 7, 2023, the Wisconsin Department of Natural Resources (DNR) received *Third Round of Commissioning for Community Within the Corridor – West Block – Buildings 4 and 5 – Final Report* (the Report), dated October 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, and to “confirm that another round of commissioning is not required.”

The DNR reviewed the Report for compliance with Wisconsin Statutes (Wis. Stats.) ch. 292 and Wisconsin Administrative (Wis. Admin.) Code chs. NR 700-754. Based on the information presented in the Report, no additional commissioning events at Buildings 4 and 5 of CWC West Block are required at this time. The *Next Steps* section below provides further information on the documentation that is required prior to DNR providing formal commissioning approval for Buildings 4 – 8B of CWC West Block.

Next Steps

In consideration of administrative code requirements, as outlined in the DNR’s October 6, 2023, *Technical Assistance Provided – Commissioning Plan Review* letter, the DNR is requesting the implementation of the following schedule:

- 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 the site buildings, the as-built report must be submitted for DNR review. 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.

- 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. 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.
- 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, *Technical Assistance Provided – 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

cc: Mr. Que El-Amin, Scott Crawford, Inc., que@scott-crawford.com – electronic copy
Dr. Pratap N. Singh, K Singh & Associates, Inc., psingh@ksinghengineering.com – electronic copy
Mr. Robert Reineke, K. Singh & Associates, Inc., reineke@ksinghengineering.com – electronic copy
Dr. Mr. Sameer Neve, K. Singh & Associates, Inc., sneve@ksinghengineering.com – electronic copy