



ENVIRONMENTAL CONSULTING, INC.
2002 RENAISSANCE BOULEVARD
SUITE 110
KING OF PRUSSIA, PENNSYLVANIA 19406

Telephone: (610) 279-7070

Facsimile: (610) 279-4334

February 21, 2017

Project No. 2016.110

Jay Hnat, Hydrogeologist
Wisconsin Department of Natural Resources
2300 North Martin Luther King Drive
Milwaukee, Wisconsin 53212

RE: Post-Closure Modification Request
709-733 East Capitol Drive
City of Milwaukee, Milwaukee County, Wisconsin 53212
FID #241975140
BRRTS #02-41-200169

Dear Mr. Hnat:

Environmental Consulting, Inc. is pleased to submit this Post-Closure Modification (“PCM”) request for the above referenced property, referenced hereinafter as the subject property. This PCM request is being submitted in accordance with the requirements of the Wisconsin Department of Natural Resources (“WDNR”) Remediation & Redevelopment (“RR”) form entitled Post-Closure Modifications: Changes to Property Conditions after a State-Approved Cleanup (i.e., DNR RR-987). Environmental Consulting, Inc.’s client, Palestra Real Estate Partners, Inc., is under contract to purchase the subject property and intends to redevelop the subject property into a dialysis center.

The subject property consists of approximately 31,500 square feet of vacant land located at the southeast corner of the intersection of East Capitol Drive and North Fratney Street. The subject property currently consists of a paved asphalt parking lot. In 1997, environmental due diligence activities revealed that a dry cleaning facility and a maintenance garage were previously located on the subject property between the 1930s and the 1970s. The dry cleaning facility was located on the west portion of the subject property and the maintenance garage was located to the south of the subject property. Several underground storage tanks (“USTs”) containing gasoline, waste oil and solvent were previously located at this site and initial site investigation activities discovered petroleum and chlorinated solvent impacted soil and groundwater on the subject property that exceeded applicable Wisconsin Department of Natural Resources (“WDNR”) standards. Following the completion of site investigation activities performed between 1997 and 2007, the owner of the subject property requested case closure from the WDNR with the submittal of a Geographic Information System (“GIS”) Registry packet for the residual soil and groundwater contamination on the subject property. On May 1, 2008, WDNR issued a letter granting closure and allowing contaminated soil and groundwater to be managed in-place at the subject property. The management in-place of the soil and groundwater contamination at this site is via engineering controls (i.e., an asphalt pavement cap) and institutional controls which consists of the inclusion of this site in Wisconsin’s GIS Registry system. The Bureau for Remediation and Redevelopment Tracking System (“BRRTS”) assigned case number 02-41-200169 to the subject property. A copy of the Wisconsin DNR Final Case Closure letter dated May 1, 2008 for the subject property is included as Attachment 1.

As discussed above, the subject property is proposed to be developed into a dialysis center. The proposed development activities for the subject property include the following scope of work:

- construction of one (1) one-story, slab on-grade steel-framed commercial building with an approximate building footprint of 6,070 square feet;
- construction of a paved asphalt parking lot;
- construction of concrete flatwork areas; and
- construction of limited landscaped areas.

A copy of a Site Plan prepared by StudioGC Architects dated January 31, 2017 illustrating the proposed development of the subject property is included as Attachment 2. A copy of the existing conditions plan is included as Attachment 3.

Environmental Consulting, Inc. prepared a Soil Management Plan to be utilized during the redevelopment of the subject property. A copy of the Soil Management Plan is included as Attachment 4. The attached Soil Management Plan identifies and describes the procedures to be followed during the construction activities associated with the development of the proposed dialysis center due to the contaminated soil and groundwater located on the subject property. If surplus soil is generated during construction, then the surplus soil will require transportation off-site to a permitted facility for disposal. The contaminated soil will be temporarily stockpiled on and covered with 6-mil polyethylene sheeting pending approval for off-site disposal. The contaminated soil will be properly characterized via laboratory analysis in order to obtain approval from the disposal facility for the disposal of the surplus soil. After approval from the disposal facility, the contaminated soil will be loaded into trucks and transported off-site to an approved facility for disposal. If applicable, soil manifests will be included in the Final PCM Report to be submitted at the conclusion of the redevelopment activities.

Based on the proposed construction activities and a review of DNR RR-987, this PCM request is considered a Category 2 activity. A check in the amount of \$1,700 is included with this submission. Proper engineering controls and institutional controls will be used to eliminate potential exposure to the contaminants on the subject property. The engineering controls will consist of the replacement of the existing site-wide cap. The site-wide cap, which will be constructed as part of the planned redevelopment of the subject property, will consist of a combination of concrete building slabs; asphalt and concrete pavement; and vegetated clean fill. Groundwater is not expected to be encountered during the proposed development activities on the subject property and will be managed in accordance with applicable regulations, if needed. The institutional controls will consist of the continued inclusion of the subject property in Wisconsin's GIS Registry system, which will be updated at the conclusion of the proposed redevelopment project.

A site-specific health and safety plan was prepared for the field activities associated with the construction of the proposed building on the subject property due to the existing contaminated soil and groundwater. The site-specific health and safety plan was prepared in accordance with the Occupational Safety and Health Administration ("OSHA") 29 Code of Federal Regulations ("CFR") 1910.120. Each worker on the subject property and each visitor to the subject property will be required to comply with the site-specific health and safety plan. A log will be maintained on the subject property to document each worker and each visitor who has read the site-specific health and safety plan. A copy of the site-specific health and safety plan is included as Attachment 5.

Although not required, a vapor barrier and vapor collection system will be installed beneath the proposed building foundation as a conservative measure. Copies of the plans for the proposed vapor mitigation system are included as Attachment 6. Environmental Consulting, Inc. will prepare as-built plans that depict the as-built conditions of the mitigation system for the building which will be included in the Final PCM Report.

Continuing obligations are defined as site-specific actions required to minimize exposure to remaining contamination. The continuing obligation for the subject property will be the maintenance of the proposed site-wide cap as documented in this PCM request. At the conclusion of the redevelopment activities, Environmental Consulting, Inc. will submit a Final PCM Report documenting the successful capping of the subject property.

Please do not hesitate to contact me if you have any questions regarding this PCM request.

Sincerely,

ENVIRONMENTAL CONSULTING, INC.

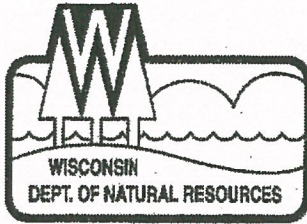


Richard S. Werner, P.G.
President

Cc: Robert Murdocca, Palestra Real Estate Partners, Inc.

ATTACHMENT 1

**WDNR FINAL CASE CLOSURE LETTER,
DATED MAY 1, 2008**



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
PO Box 12436
Milwaukee, Wisconsin 53212-0436
Telephone 414-263-8500
FAX 414-263-8716
TTY 414-263-8713

May 1, 2008

Mr. Floyd Berggren
Berggren Investment Company, LLP
2979 Maple Road
Jackson, WI 53037

SUBJECT: Final Case Closure, 709-733 East Capitol Drive, Milwaukee WI. FID # 241975140
BRRTs # 02-41-200169

Dear Mr. Floyd:

On May 1, 2008, the Department of Natural Resources reviewed your request for closure of the case described above. The Department reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. On February 8, 2000 you were notified that the Closure had granted conditional closure to this case.

On December 5, 2007 the Department received correspondence indicating that you have complied with the requirements of closure by submitting a complete GIS packet for soil and groundwater contamination.

Based on the correspondence and data provided, it appears that your case meets the requirements of ch. NR 726, Wisconsin Administrative Code. The Department considers this case closed and no further investigation or remediation is required at this time.

Please be aware that this case may be reopened pursuant to s. NR 726.09, Wisconsin Administrative Code, if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety or welfare, or the environment.

GIS Registry

The conditions of case closure set out below in this letter require that your site be listed on the Remediation and Redevelopment Program's GIS Registry. The specific reasons are summarized below:

- Residual soil contamination (ethylbenzene) exists that must be properly managed should it be excavated or removed.
- Groundwater contamination is present above Chapter NR 140 enforcement standards (Naphthalene and total TMB).

Information that was submitted with your closure request application will be included on the GIS Registry. To review the sites on the GIS Registry web page, visit the RR Sites Map page at: <http://dnr.wi.gov/org/aw/rr/gis/index.htm>. If your property is listed on the GIS Registry because of remaining contamination and you intend to construct or reconstruct a well, you will need prior Department approval in accordance with s. NR 812.09(4)(w), Wis. Adm. Code. To obtain approval,

Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line <http://dnr.wi.gov/org/water/dwg/3300254.pdf> or at the web address listed above for the GIS Registry.

Remaining Residual Soil Contamination

Residual soil contamination remains at the estimated extent of soils above generic RCLs in the areas of SB-10, SB-15, SB-16, SB-18, SB-19 and SB-20 as indicated in the information submitted to the Department of Natural Resources. If soil in the specific locations described above is excavated in the future, then pursuant to ch. NR 718 or, if applicable, ch. 289, Stats., and chs. 500 to 536, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material would be considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

We appreciate your efforts to restore the environment at this site to productive use. If you have any questions regarding this letter, please contact me at (414)263-8607.

Sincerely,


Binyoti F. Amungwafor
Hydrogeologist

CC: Ms. Shelley L. Hildebrandt, MidWest Engineering Services, Inc.
Case file

ATTACHMENT 2

PROPOSED DEVELOPMENT PLAN

ATTACHMENT 3

EXISTING CONDITIONS PLAN

ATTACHMENT 4

SOIL MANAGEMENT PLAN



ENVIRONMENTAL CONSULTING, INC.
2002 RENAISSANCE BOULEVARD
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Telephone: (610) 279-7070

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SOIL MANAGEMENT PLAN

709 EAST CAPITOL DRIVE
CITY OF MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN 53212

Prepared by:

Environmental Consulting, Inc.
2002 Renaissance Boulevard
Suite 110
King of Prussia, Pennsylvania 19406

Prepared for:

Attention: Mr. Robert Murdocca
Palestra Real Estate Partners, Inc.
808 Montparnasse Place
Newtown Square, Pennsylvania 19073

A handwritten signature in black ink that reads 'Samuel J. Kucia'. The signature is written in a cursive style with a horizontal line underneath it.

Samuel J. Kucia
Vice President

A handwritten signature in black ink that reads 'Richard S. Werner, P.G.'. The signature is written in a cursive style with a horizontal line underneath it.

Richard S. Werner, P.G.
President

February 21, 2017

Project No. 2016.110

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1.0 INTRODUCTION

This Soil Management Plan (“SMP”) was prepared on behalf of Palestra Real Estate Partners, Inc. (“Client”) in connection with the development of the proposed DaVita Inc. Northshore Dialysis facility located at 709 East Capitol Drive in City of Milwaukee, Milwaukee County, Wisconsin, referenced hereinafter as the subject property. This SMP was prepared as part of a Post-Closure Modification request and subsequent report for the Wisconsin Department of Natural Resources (“WDNR”) due to the existing contaminated soil and groundwater identified on the subject property that will require proper management on-site during the proposed construction activities.

On May 1, 2008, WDNR issued a letter granting case closure of the subject property allowing contaminated soil and groundwater to be managed in-place via engineering controls (i.e., asphalt cap) and institutional controls which consists of the inclusion of the subject property in Wisconsin’s GIS Registry system.

The objective of this SMP is to identify and describe the procedures to be followed during the construction activities associated with the development of the proposed dialysis facility due to the contaminated soil and groundwater located on the subject property.

The recommended cleanup plan for the contaminated soil and groundwater consists of the installation of proper engineering controls and institutional controls to eliminate potential exposure to the contaminants on the subject property. The engineering control will consist of the installation of a site-wide cap. The site-wide cap, which will be constructed as part of the planned development of the subject property, will consist of a combination of concrete building slabs, asphalt and concrete pavement and vegetated clean fill. Groundwater is not expected to be encountered during the proposed development activities on the subject property. The institutional controls will consist of the inclusion of the subject property in Wisconsin’s GIS Registry system.

This SMP will be modified and updated as needed. The personnel involved with the site construction activities will be informed of changes made to the SMP.

2.0 SITE DESCRIPTION

The subject property consists of approximately 31,500 square feet of vacant land. The subject property is located at the southeast corner of the intersection of East Capitol Drive and North Fratney Street. The subject property currently consists of a paved asphalt parking lot associated with a multi-tenant commercial shopping center anchored by a Piggly Wiggly supermarket. The subject property is located on the *Milwaukee, Wisconsin* United States Geological Survey (“USGS”) 7.5 minute topographic quadrangle, dated 2016. A copy of a portion of the USGS topographic quadrangle identifying the location of the subject property is included as Appendix A. A copy of a Site Map illustrating the existing layout and features of the subject property is included in Appendix B.

3.0 PROPOSED SITE DEVELOPMENT ACTIVITIES

Based on a review of set of drawings, prepared by StudioGC Architects, dated January 31, 2017, the proposed development activities for the subject property includes the following scope of work:

- construction of one (1) one-story, slab on-grade steel-framed commercial building with an approximate building footprint of 6,070 square feet.
- construction of a paved asphalt parking lot;
- construction of concrete flatwork areas; and
- construction of limited landscaped areas.

A copy of a Site Plan prepared by StudioGC Architects dated January 31, 2017 illustrating the proposed development of the subject property is included in Appendix C.

4.0 PROPOSED REUSE OF ON-SITE MATERIAL

The contaminated soil to remain on the subject property will be managed in accordance with appropriate engineering and institutional controls as described in the Post-Closure Modification request prepared by Environmental Consulting, Inc., dated February 21, 2017. The engineering controls will consist of a physical barrier (i.e., site-wide cap) to limit potential exposure and/or contaminant migration associated with the underlying contaminated soil and groundwater on the subject property. The site-wide cap, which will be constructed as part of the planned redevelopment of the subject property, will consist of a combination of concrete building slabs; asphalt and concrete pavement; and vegetated clean fill.

During the site development activities, Environmental Consulting, Inc.'s on-site representative will be present on the subject property to observe the contractor and to ensure the proper implementation of this SMP and a Site-Specific Health and Safety Plan, which was prepared under separate cover by Environmental Consulting, Inc. dated February 21, 2017. Contaminated soil encountered during the site development activities to be reused on-site will be temporarily stockpiled on and covered with 6-mil polyethylene sheeting in dedicated areas to be identified by the Client and/or Contractor.

The contaminated soil excavated on the subject property as part of the site development activities will be visually inspected and will be field screened with a photo ionization detector ("PID") to determine the presence or absence of volatile organic compounds ("VOCs"). In the event that solid waste materials are encountered within the excavated contaminated soil, the solid waste materials will be segregated and characterized for proper off-site disposal in accordance with applicable federal, state and local regulations. The contaminated soil temporarily stockpiled on the subject property will be backfilled and placed under the final site-wide cap.

5.0 WASTE MANAGEMENT PROCEDURES

Based on preliminary grading calculations from the Client and the Client's design/construction representatives for the proposed development of the subject property, a minimal volume of surplus soil may be generated during the proposed construction that will require transportation off-site to a permitted facility for disposal or beneficial reuse. Note that actual cut and fill quantities may vary changing the volume of surplus soil requiring proper off-site disposal.

Surplus soil which contains contaminant concentrations above applicable WDNR standards will be temporarily stockpiled on and covered with 6-mil polyethylene sheeting pending approval for off-site disposal. The contaminated soil designated for off-site disposal will be properly characterized via laboratory analysis in order to obtain approval from the disposal facility. After approval from the disposal facility, the contaminated soil will be loaded into trucks for transportation off-site to an approved facility for disposal or beneficial reuse.

6.0 HEALTH AND SAFETY PROCEDURES

Contaminated soil and groundwater exist on the subject property. The proposed construction activities on the subject property should not pose any type of risk to off-site personnel or the public. The risk is considered negligible. However, in the event that a risk to off-site personnel or the public would occur, the appropriate changes to this SMP and to the Site-Specific Health and Safety Plan dated February 21, 2017 will be made and Environmental Consulting, Inc. will inform the parties that may be affected. Unauthorized personnel will not be allowed in the immediate area or surrounding areas during the construction activities.

7.0 STORMWATER POLLUTION PREVENTION AND SOIL EROSION CONTROLS

Prior to implementation of the site development activities, perimeter stormwater runoff controls and soil erosion and sedimentation control measures should be in-place in accordance with an approved Soil Erosion and Sediment Control Plan. Additional stormwater pollution prevention methods will be implemented as necessary upon excavation of contaminated soil. These methods include, but are not limited to, stabilization of historic fill stockpiles with 6-mil polyethylene sheeting. Covering of the stockpiles should be in good condition, joined at the seams, and securely anchored.

Construction best management practices (“BMPs”) should also be implemented to control, reduce or prevent discharges of pollutants from construction activities. Excavation of contaminated soil should include the following BMPs:

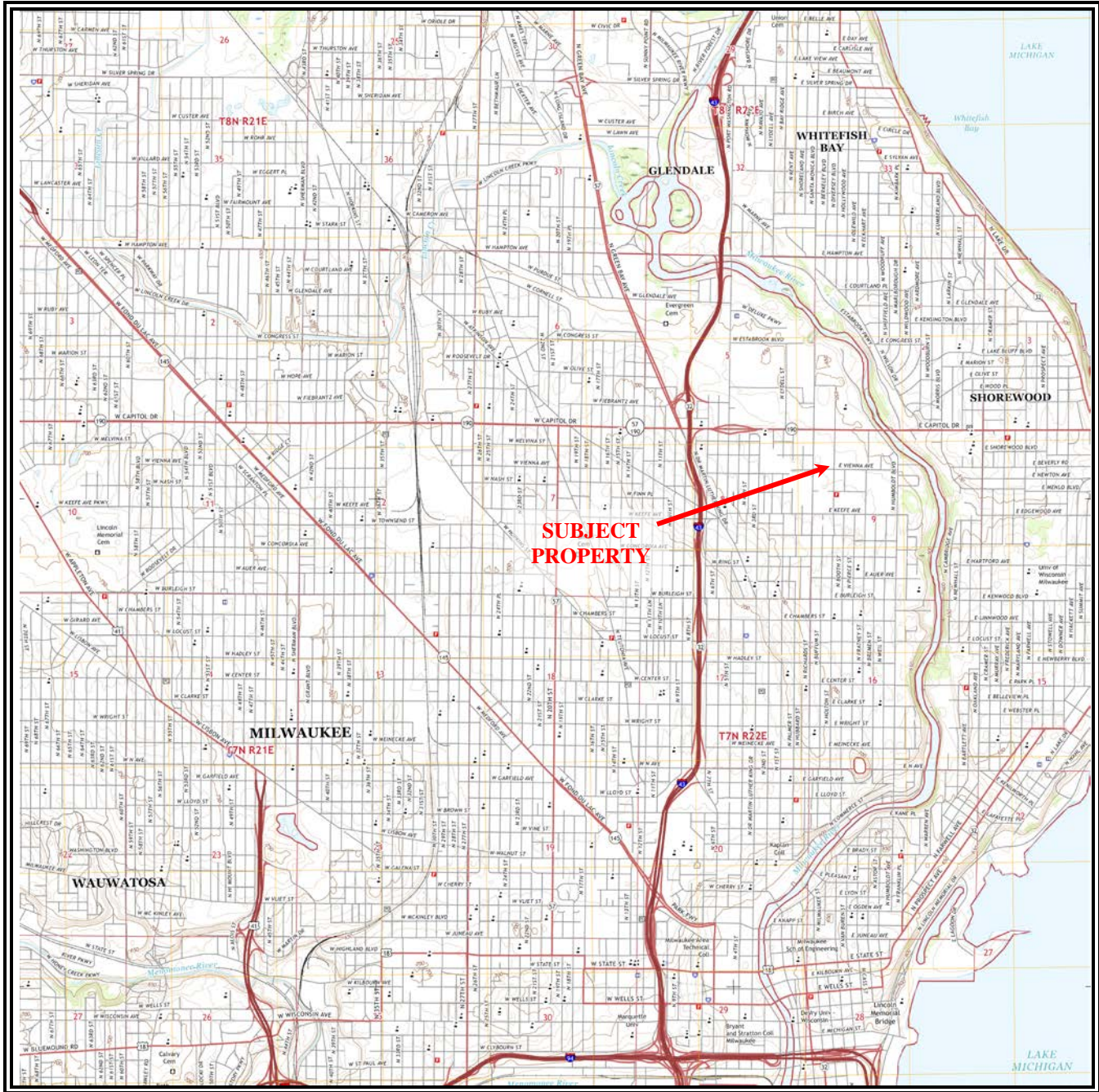
- Schedule excavation work for dry weather periods when possible;
- Protect stormwater drains or inlets using earth dikes, straw bales, sand bags, absorbent socks, or other controls to divert or trap and filter stormwater runoff; and
- Avoid over application by water trucks for dust control (see Section 8.0).

8.0 DUST CONTROL

Dust control measures such as wetting the soil as necessary, utilizing appropriate tarped containers and transport vehicles, covering excavated areas and surplus soil stockpiles should be implemented as needed to mitigate fugitive dust.

APPENDIX A

PROPERTY LOCATION MAP



709 East Capitol Drive
 City of Milwaukee, Milwaukee County, Wisconsin 53212
 Project No. 2016.110

**PROPERTY
 LOCATION MAP**



ENVIRONMENTAL CONSULTING, INC.
 2002 RENAISSANCE BOULEVARD
 SUITE 110
 KING OF PRUSSIA, PENNSYLVANIA 19406

**MILWAUKEE, WI
 USGS QUADRANGLE
 2016
 SCALE: UNKNOWN**

APPENDIX B

EXISTING CONDITIONS PLAN

APPENDIX C

PROPOSED DEVELOPMENT PLAN

THIS DRAWING IS THE PROPERTY OF INFORM STUDIO - UNAUTHORIZED USE OF ANY KIND, INCLUDING USE ON OTHER PROJECTS, IS PROHIBITED.

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E. CAPITOL DRIVE

NEW BUILDING 6,070 SF

N. FRATNEY STREET

22 TOTAL PARKING SPACES

TYPICAL PERIMETER
DECIDUOUS TREES 30'-40' HT
@ 25 FT O.C.

TYPICAL (2) STAGGERED
4FT HT SHRUBS @ 4FT
O.C.

TYPICAL 4 FT ORNAMENTAL
FENCE

TYPICAL DECIDUOUS
TREES 30'-40' HT AT
PARKING AREA

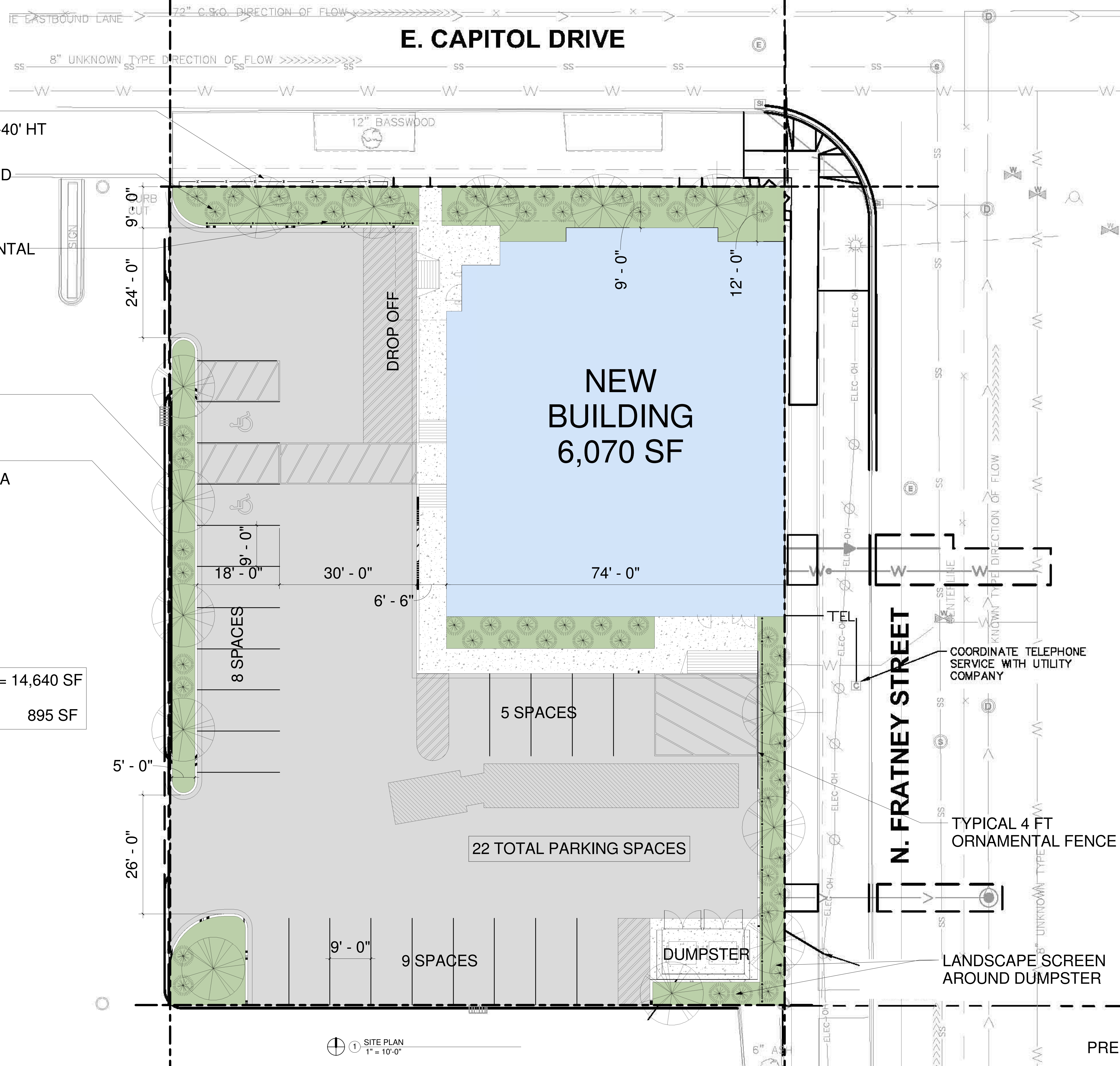
TYPICAL 4FT SHRUBS
AROUND PARKING AREA

TOTAL PARKING AREA = 14,640 SF
TOTAL LANDSCAPED
AREA AT PARKING = 895 SF

1 SITE PLAN
1" = 10'-0"

PRELIMINARY 081516

PROJECT # 15097B
SHEET NO. C-1



ATTACHMENT 5

SITE-SPECIFIC HEALTH AND SAFETY PLAN



ENVIRONMENTAL CONSULTING, INC.
2002 RENAISSANCE BOULEVARD
SUITE 110
KING OF PRUSSIA, PENNSYLVANIA 19406

Telephone: (610) 279-7070

Facsimile: (610) 279-4334

SITE-SPECIFIC HEALTH AND SAFETY PLAN

709 EAST CAPITOL DRIVE
CITY OF MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN 53212

Prepared by:

Environmental Consulting, Inc.
2002 Renaissance Boulevard
Suite 110
King of Prussia, Pennsylvania 19406

Prepared for:

Attention: Mr. Robert Murdocca
Palestra Real Estate Partners, Inc.
808 Montparnasse Place
Newtown Square, Pennsylvania 19073

A handwritten signature in black ink that reads 'Samuel J. Kucia'. The signature is written in a cursive style and is positioned above a horizontal line.

Samuel J. Kucia
Vice President

A handwritten signature in black ink that reads 'Richard S. Werner, P.G.'. The signature is written in a cursive style and is positioned above a horizontal line.

Richard S. Werner, P.G.
President

February 21, 2017

Project No. 2016.110

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1.0 INTRODUCTION

This Site-Specific Health and Safety Plan (“Plan”) was prepared for the field activities associated with the construction of the proposed DaVita Inc. Northshore Dialysis facility located at 709 East Capitol Drive property located in the City of Milwaukee, Milwaukee County, Wisconsin, referenced hereinafter as the subject property. The Plan was prepared in accordance with the Occupational Safety and Health Administration (“OSHA”) 29 Code of Federal Regulations (“CFR”) 1910.120. The field activities are being completed for Palestra Real Estate Partners, Inc., referenced hereinafter as the Client. This Plan does not relieve the property owner, the Client or subcontractors from the responsibility for the safety and health of their personnel while on the subject property.

This Plan will be modified and updated as needed. The personnel involved with the site construction activities will be informed of changes made to the Plan.

2.0 SITE DESCRIPTION

The subject property consists of approximately 31,500 square feet of vacant land. The subject property is located at the southeast corner of the intersection of East Capitol Drive and North Fratney Street. The subject property currently consists of a paved asphalt parking lot associated with a multi-tenant commercial shopping center anchored by a Piggly Wiggly supermarket. The subject property is located on the *Milwaukee, Wisconsin* United States Geological Survey (“USGS”) 7.5 minute topographic quadrangle, dated 2016. A copy of a portion of the USGS topographic quadrangle identifying the location of the subject property is included as Appendix A. A copy of a Site Map illustrating the layout and features of the subject property is included in Appendix B.

3.0 KEY PERSONNEL

The organization structure establishes the project chain-of-command and specifies the overall responsibilities of supervisors and employees that may be involved in the soil remediation activities and/or building demolition activities at the subject property. The project-specific organizational structure for the soil remediation activities and building demolition activities to be completed at the subject property is as follows:

Organizational Structure

Title	Name/Contact	Company	Contact Information
Construction Manager	Craig Meadows	StudioGC	847-343-8638
Client	Vince Curran	Palestra Real Estate Partners, Inc.	610-639-3937
Project Manager	Richard Werner	Environmental Consulting, Inc.	610-279-7070 (office) 610-476-5141 (cell)
Field Team Leader	Andrew Hubley	Environmental Consulting, Inc.	610-279-7070 (office) 610-476-5139 (cell)
Health and Safety Officer/ Site Security Officer/Field Team Member	Pete Photopoulos	Environmental Consulting, Inc.	610-279-7070 (office) 484-614-4742 (cell)

The Project Manager (“PM”) is the primary off-site contact. Responsibilities of the PM include allocation of resources; document preparation and review, general project oversight and contract management.

The Health and Safety Officer (“HSO”) is responsible for implementing the Health and Safety Program for Environmental Consulting, Inc. in the field and advising subcontractors on all aspects of safety and health. The HSO has the authority to stop work if there is an imminent safety hazard encountered during subject property activities.

The Site Security Officer (“SSO”) is responsible for managing site security and notifying emergency response personnel in the event of an emergency. The SSO is responsible for enforcing site control.

The Field Team Leader and Field Team Members are responsible for completion of on-site and off-site tasks to be performed during the site work and for complying with all aspects of the Plan. They are experienced in excavation oversight, sample collection, building demolition, waste disposal practices and proper health and safety procedures.

4.0 SCOPE OF WORK

Based on a review of set of drawings, prepared by StudioGC Architects, dated January 31, 2017, the proposed construction activities for the subject property includes the following scope of work:

- construction of one (1) one-story, slab on-grade steel-framed commercial building with an approximate building footprint of 6,070 square feet.
- construction of a paved asphalt parking lot;
- construction of concrete flatwork areas; and
- construction of limited landscaped areas.

5.0 SITE HEALTH AND SAFETY RISKS

The proposed construction activities on the subject property should not pose any type of risk to off-site personnel or the public. The risk is considered negligible. However, in the event that a risk to off-site personnel or the public would occur, the appropriate changes to the Plan will be made and Environmental Consulting, Inc will inform the parties that may be affected. Unauthorized personnel will not be allowed in the immediate area or surrounding areas during the construction activities.

Environmental Consulting, Inc. is responsible for providing the adequate protection for personnel and safe operating machinery to perform the tasks described in this Plan.

5.1 Physical Hazards

The following physical hazards may pose a potential concern as a health and safety risk on the subject property during the proposed demolition/construction activities:

- fire;
- dust;
- manual lifting;
- slip, trip and falls;
- heat stress (see also Section 5.2 of this Plan);
- overhead utilities;
- severe weather/sunburn;
- biological;
- heavy equipment;
- vehicular traffic; and
- noise.

5.2 Heat Stress

The HSO is responsible for evaluating the potential effect of heat stress on workers related to the proposed construction activities performed on the subject property. The HSO will perform this task by evaluating the ambient air temperature, wind speed, degree of work and amount of rest allocated for each worker during the activity performed on the subject property to not permit the rise of the core body temperature above 100.4°F (38°C).

5.3 Cold Stress

The proposed construction activities to be completed on the subject property will be initiated during warm weather months but will likely extend into the winter months. Therefore, cold stress may be a concern for worker safety for this project depending on weather conditions.

5.4 Tool and Safety Equipment

All tools and equipment used during the proposed construction activities will be inspected prior to use and only used for the intended purpose. When the need arises for the purchase of a new tool or the replacement of a tool, the PM will be notified know as soon as possible so that one can be purchased.

The following suggestions apply to the safe use of several hand tools that are frequently used:

- When a tool becomes damaged, either repair it before using it again or dispose of it.
- Wear safety glasses when using a cutting or drilling tool and require all others around you to wear safety glasses.
- Keep all tools cleaned and stored appropriately when not in use.
- Use the correct tool intended for the task at hand.

5.5 Contaminated Soil and Groundwater

On May 1, 2008, WDNR issued a letter granting case closure of the subject property allowing contaminated soil and groundwater to be managed in-place via engineering controls (i.e., asphalt cap) and institutional controls which consists of the inclusion of the subject property in Wisconsin's GIS Registry system.

Since the development of the subject property will "disturb" the existing asphalt cap, a Post-Closure Modification request and subsequent report must be submitted to WDNR for their review and approval. This Post-Closure Modification request will document the construction activities to be performed on the subject property. The Post-Closure Modification request will include a soil management plan to properly manage the identified contamination on-site. The Post-Closure Modification request will also document the proposed replacement of the cap to include the impervious surfaces of the proposed building and proposed pavement areas and the proposed landscaped areas using clean fill. Although the vapor intrusion into buildings exposure pathway is not a concern, the Post-Closure Modification request will also document the vapor mitigation system that will be installed beneath the proposed building.

5.6 Additional Health and Safety Risks

The following risks may be encountered during the proposed construction activities:

- slippery surfaces;
- uneven terrain;
- unstable surfaces;
- moving vehicles and parked vehicles;
- subsurface as well as equipment handling and moving; and
- exposure to mechanized equipment.

These risks can be reduced by paying attention to your surroundings and informing other personnel to the risks that they have observed and encountered throughout the subject property.

6.0 HEALTH AND SAFETY PROCEDURES

6.1 Personal Protective Equipment (“PPE”)

It is anticipated that field work for this project shall be performed in Level D. Field personnel must have steel-toed boots and appropriate work clothes. All personnel shall bring an ANSI-approved hard hat, eye protection and hearing protection, so it will be available if needed. The following additional personal protective equipment (“PPE”) may be required and will be available to workers if needed:

- tyvek suits (if necessary);
- chemical resistant gloves.
- respirators/dust masks (if necessary); and
- work gloves.

6.2 On-Site Training Procedures

In accordance with Environmental Consulting, Inc. requirements, the following safety training will be performed as part of field operations:

Initial Orientation Training – As operations are initiated on site personnel will be trained about potential hazards at the work site and the requirements specified in this HASP for hazard prevention.

Tailgate Safety Briefings – The HSO, SSO or Field Team Leader will perform a tailgate safety briefing at the start of each work day, which should be documented on the *Tailgate Safety Briefing Sign-in Log Sheet*. A copy of the *Tailgate Safety Briefing Sign-in Log Sheet* is included in Appendix C.

Hazard Communication Training – All personnel shall be briefed on the hazards of chemical products they use and shall be aware of and have access to all material safety data sheets (“MSDS”).

6.3 Additional Safety Considerations

The following is a list of additional safety considerations to be taken by all site personnel during the proposed construction activities:

- Evaluate surrounding work areas for additional hazards that may be present;
- Employ fire watch procedures;
- Limited use of spark generating tools;
- If generators are needed, minimize gasoline storage on site and secure extension cords; and
- Use dust suppression as needed.

7.0 **EMERGENCY RESPONSE**

7.1 **Emergency Telephone Numbers**

Environmental Consulting, Inc. (Richard Werner)	610-279-7070 (office)
	610-476-5141 (cell)
USEPA National Response Center	1-800-424-8802
Wisconsin Department of Natural Resources (“WDNR”) Spill Hotline	1-800-943-0003
Emergency	911
Aurora Sinai Medical Center	414-219-2000

7.2 **Directions to Nearest Hospital**

The nearest hospital is Aurora Sinai Medical Center – 945 North 12th Street, Milwaukee, Wisconsin . From exiting the subject property turn left onto East Capitol Drive (a.k.a., Route 190) heading west. Go approximately 1 mile and make a right onto North Green Bay Avenue (a.k.a., Route 57) and take the Interstate 43 South ramp. Go approximately 3 miles and take the Highland Avenue exit. At top of exit ramp, make a right onto Highland Avenue and a quick left onto North 12th Street. Go 1 block south and hospital will be on the right. If necessary, proceed past the hospital and make a right onto West Kilbourn Avenue. Emergency entrance is on the right.

7.3 **Emergency Classification**

Emergencies at the subject property shall be classified as follows:

Alert – conditions are present that can result in a higher degree of emergency. No emergency response is necessary.

Unit Emergency – incident that does not disrupt work and results in partial activation of the Emergency Response Plan.

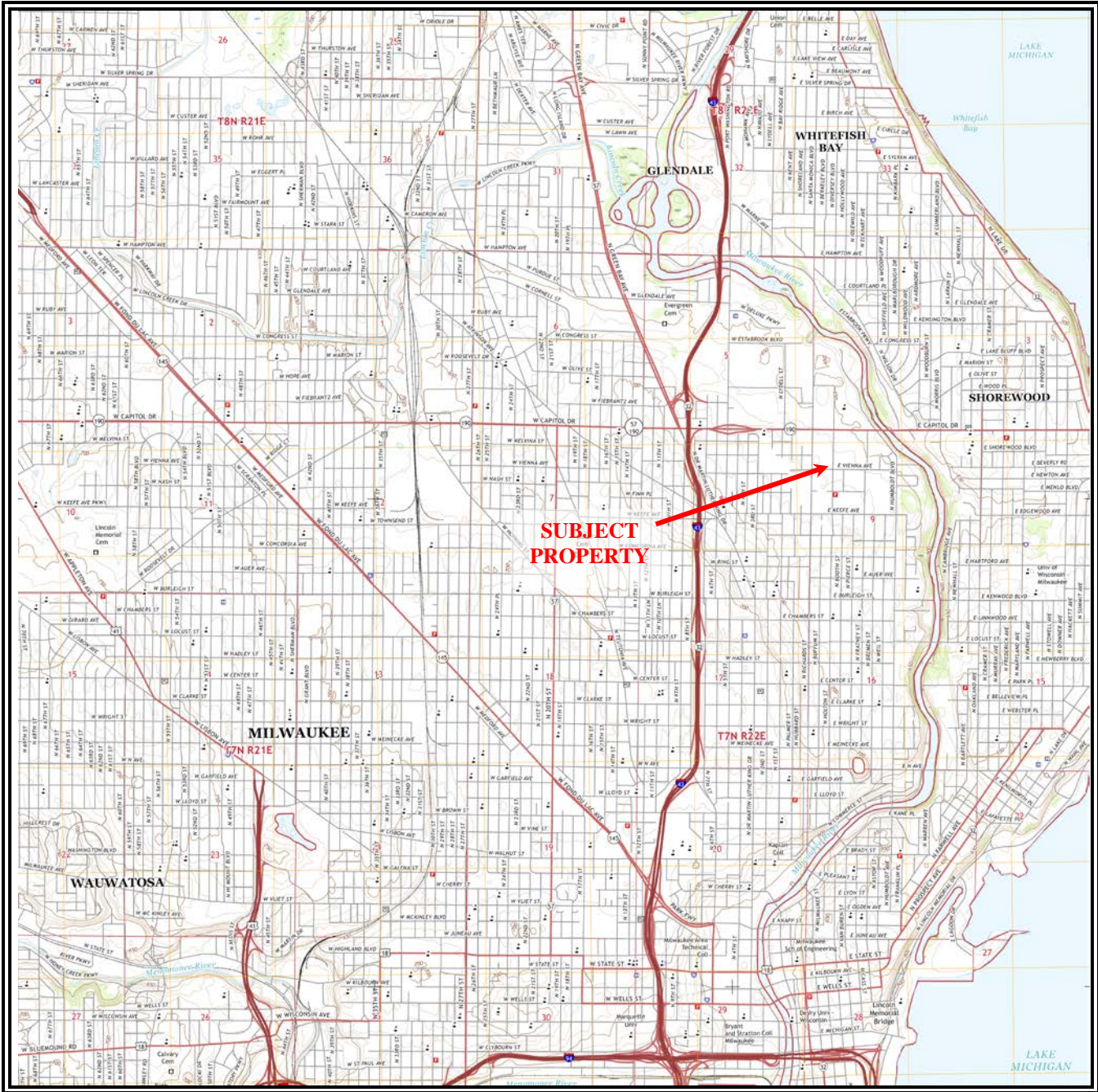
General Emergency – work stoppage is followed by a notification of all employees, the emergency response chain-of-command is activated, and a possible evacuation is prepared.

Employees are to be instructed on the conditions incidental to the emergency response system prior to on-site activities. The instruction shall include location of nearest telephone or two-way radio, location of nearest hospital and subject property chain-of-command.

7.4 **Emergency Equipment and PPE**

In case of an emergency, basic emergency and first-aid equipment will be available. Such equipment shall include a first-aid kit, emergency eyewash, fire extinguishers and other safety-related equipment.

APPENDIX A
PROPERTY LOCATION MAP



709 East Capitol Drive
 City of Milwaukee, Milwaukee County, Wisconsin 53212
 Project No. 2016.110

**PROPERTY
 LOCATION MAP**



ENVIRONMENTAL CONSULTING, INC.
 2002 RENAISSANCE BOULEVARD
 SUITE 110
 KING OF PRUSSIA, PENNSYLVANIA 19406

**MILWAUKEE, WI
 USGS QUADRANGLE
 2016
 SCALE: UNKNOWN**

APPENDIX B

SITE MAP

APPENDIX C

TAILGATE SAFETY BRIEFING SIGN-IN LOG SHEET

Tailgate Safety Briefing Sign-In Log

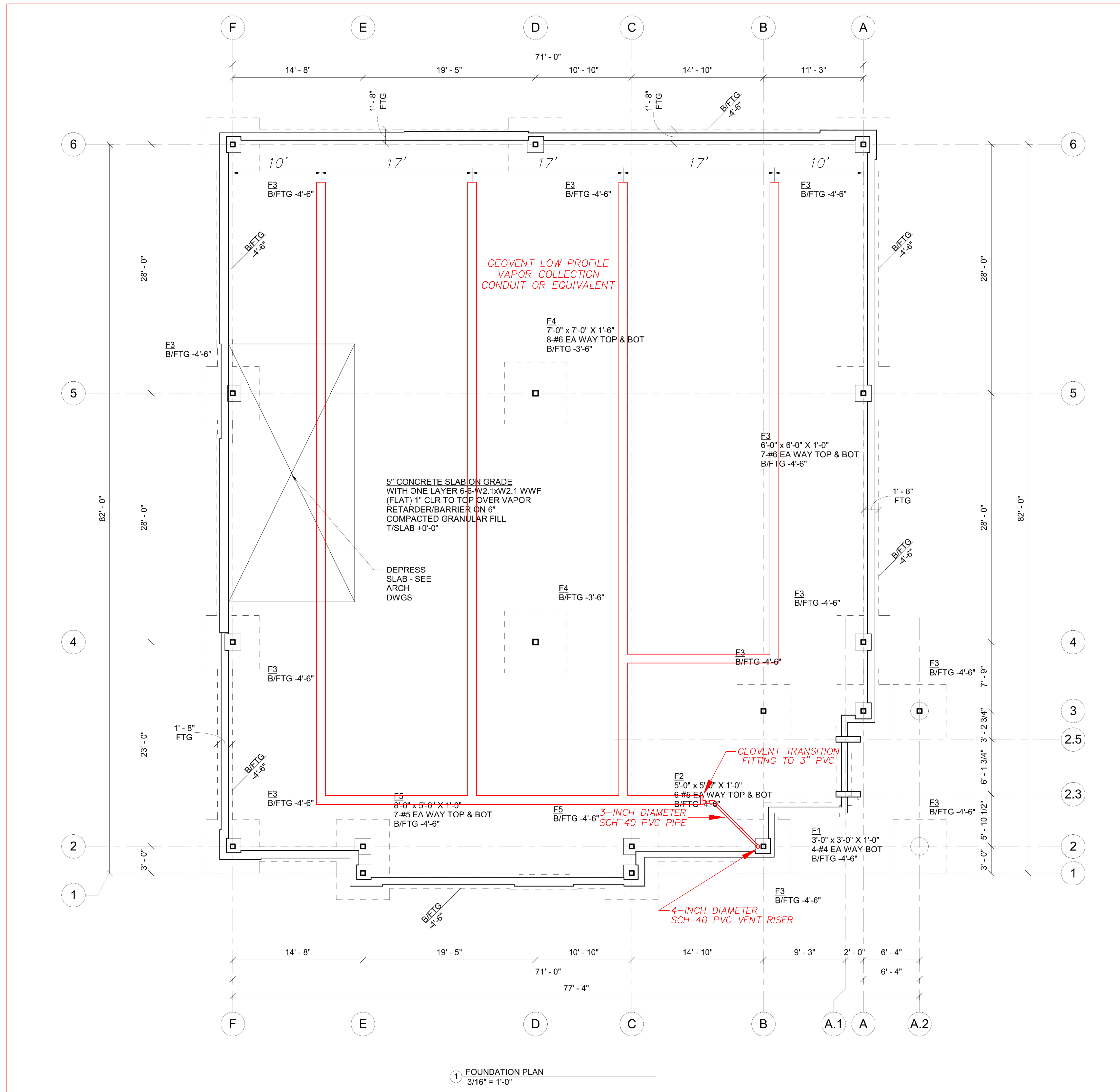
Briefing Conducted By:	Signature:	Date:	Time:
Project Name:		Project Number:	
<p>This sign-in log documents the topics of the tailgate safety briefing and individual attendance at the briefing. Personnel who work operations onsite are required to attend each safety briefing acknowledge receipt of such briefings daily. Please provide a brief narrative of the following topics as applicable to the Project.</p>			
Scope of Work			
HASP/THA review			
SOP Review			
PPE Requirements			
Incident Review			
Safety Alerts			
Other			
Personnel Sign-In List			
Printed Name and Company	Signature	Printed Name and Company	Signature
1.		7.	
2.		8.	
3.		9.	
4.		10.	
5.		11.	
6.		12.	

ATTACHMENT 6


PROPOSED VAPOR MITIGATION PLANS

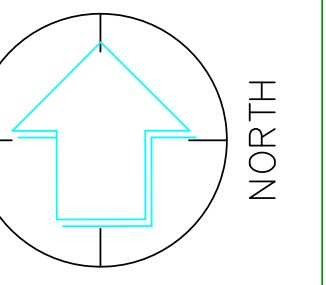
NOTES:

BASE PLAN OBTAINED FROM FOUNDATION PLAN PREPARED BY STUDIO GC, UNDATED.
SCALE IS APPROXIMATE AS THIS SITE PLAN IS INTENDED FOR ILLUSTRATIVE PURPOSES ONLY.



1 FOUNDATION PLAN
3/16" = 1'-0"

 <p>ENVIRONMENTAL CONSULTING, INC. 2002 RENAISSANCE BOULEVARD SUITE 110 KING OF PRUSSIA, PENNSYLVANIA 19406</p>	JOB No. 2016.110	SCALE: 3/16" = 1'	FIGURE No. 1
	DATE: 2/9/17	DRAWN BY: ADH	CHECKED BY: RSW
<p>709 EAST CAPITOL DRIVE CITY OF MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN, 53212</p>		<p>PROPOSED VAPOUR COLLECTION SYSTEM PLAN</p>	



PROPOSED
VAPOR BARRIER
SYSTEM PLAN

FIGURE No. 2

SCALE: 3/16" = 1'

DRAWN BY: ADH

JOB No. 2016.110

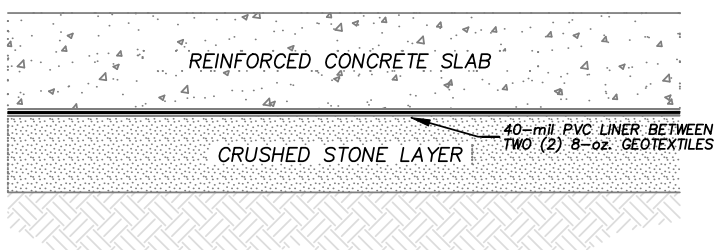
ENVIRONMENTAL CONSULTING, INC.
2002 RENAISSANCE BOULEVARD
SUITE 110
KING OF PRUSSIA, PENNSYLVANIA 19406

DATE: 2/9/17

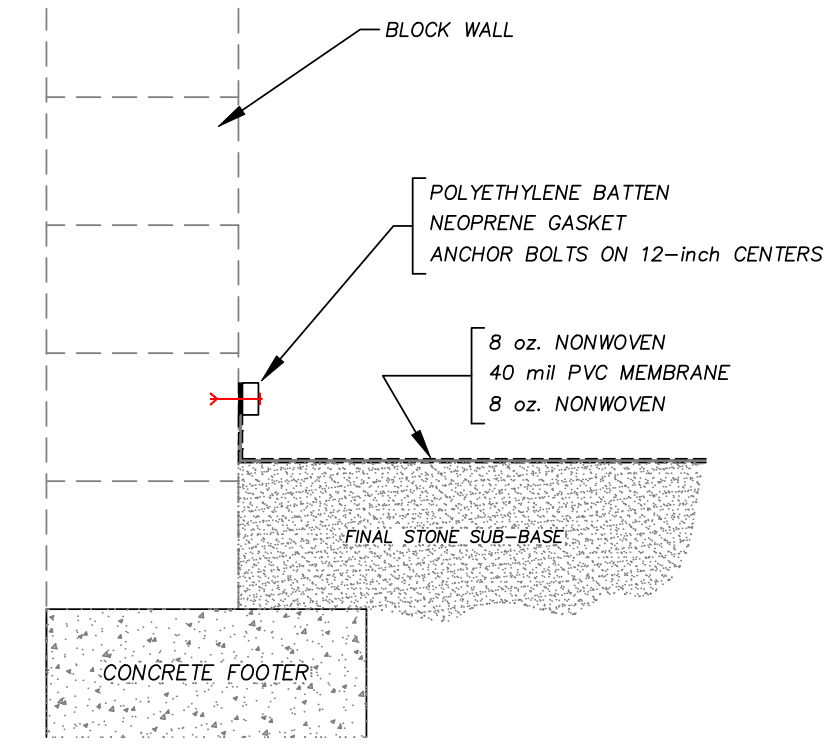
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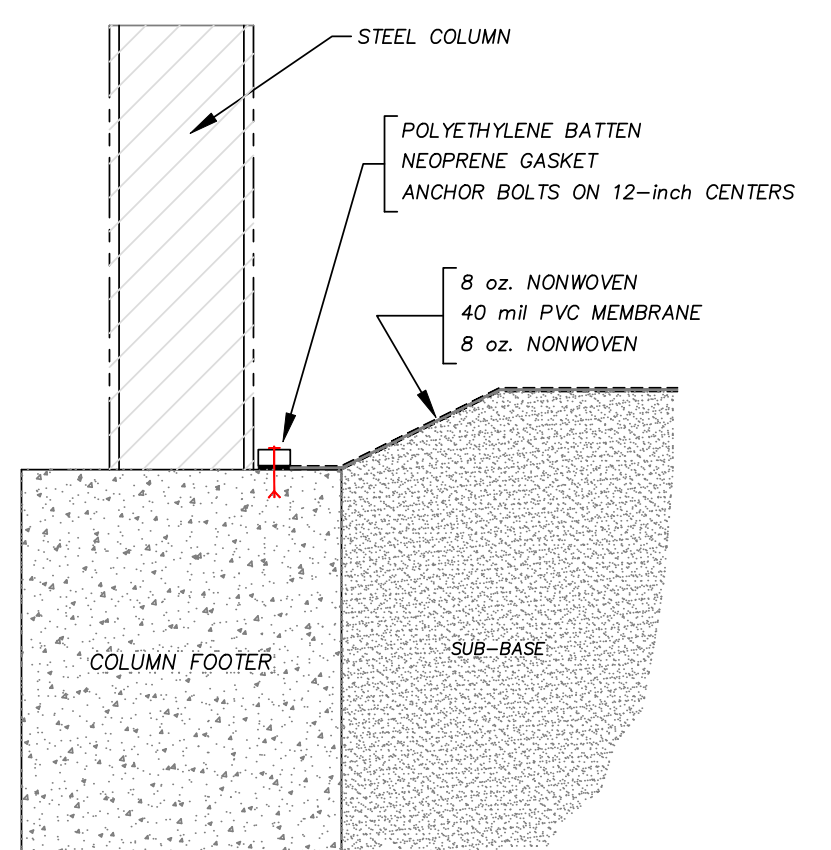
709 EAST CAPITOL DRIVE
CITY OF MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN, 53212



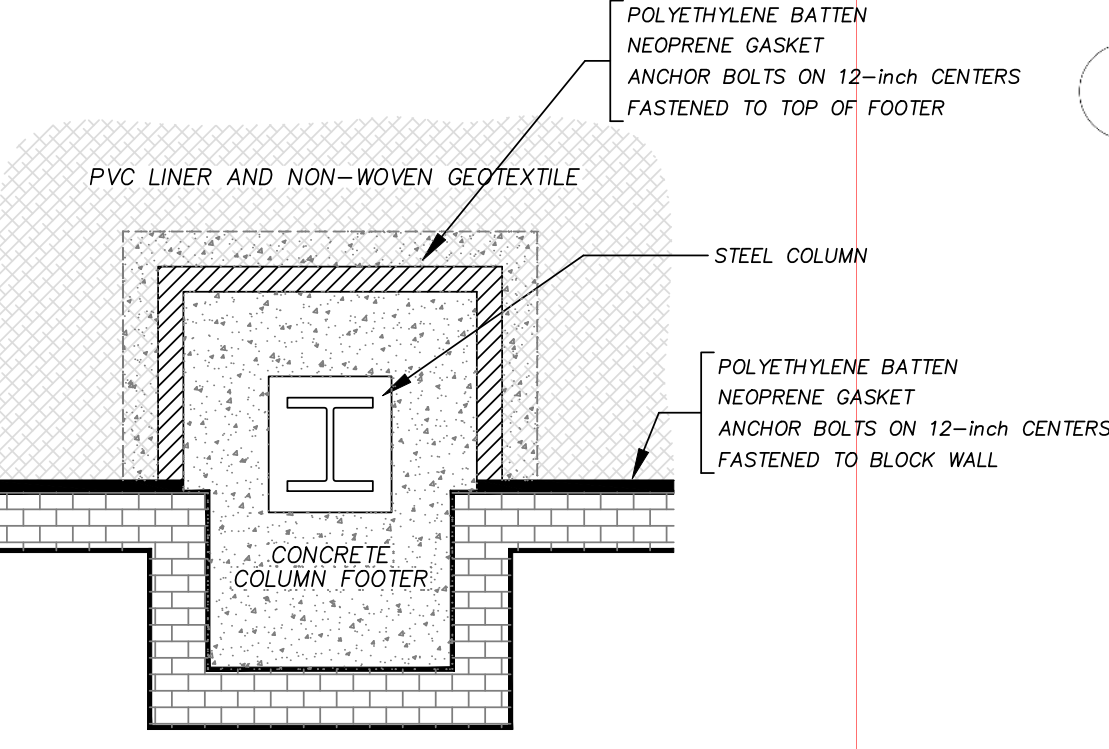
BUILDING SLAB AREA CAP WITH VAPOR BARRIER NOT TO SCALE



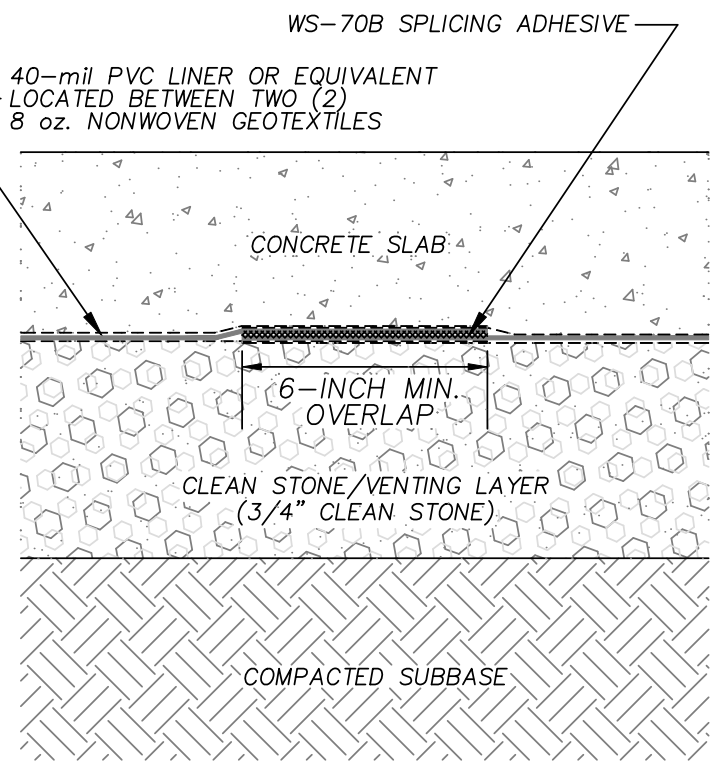
BLOCK WALL FASTENING DETAIL NOT TO SCALE



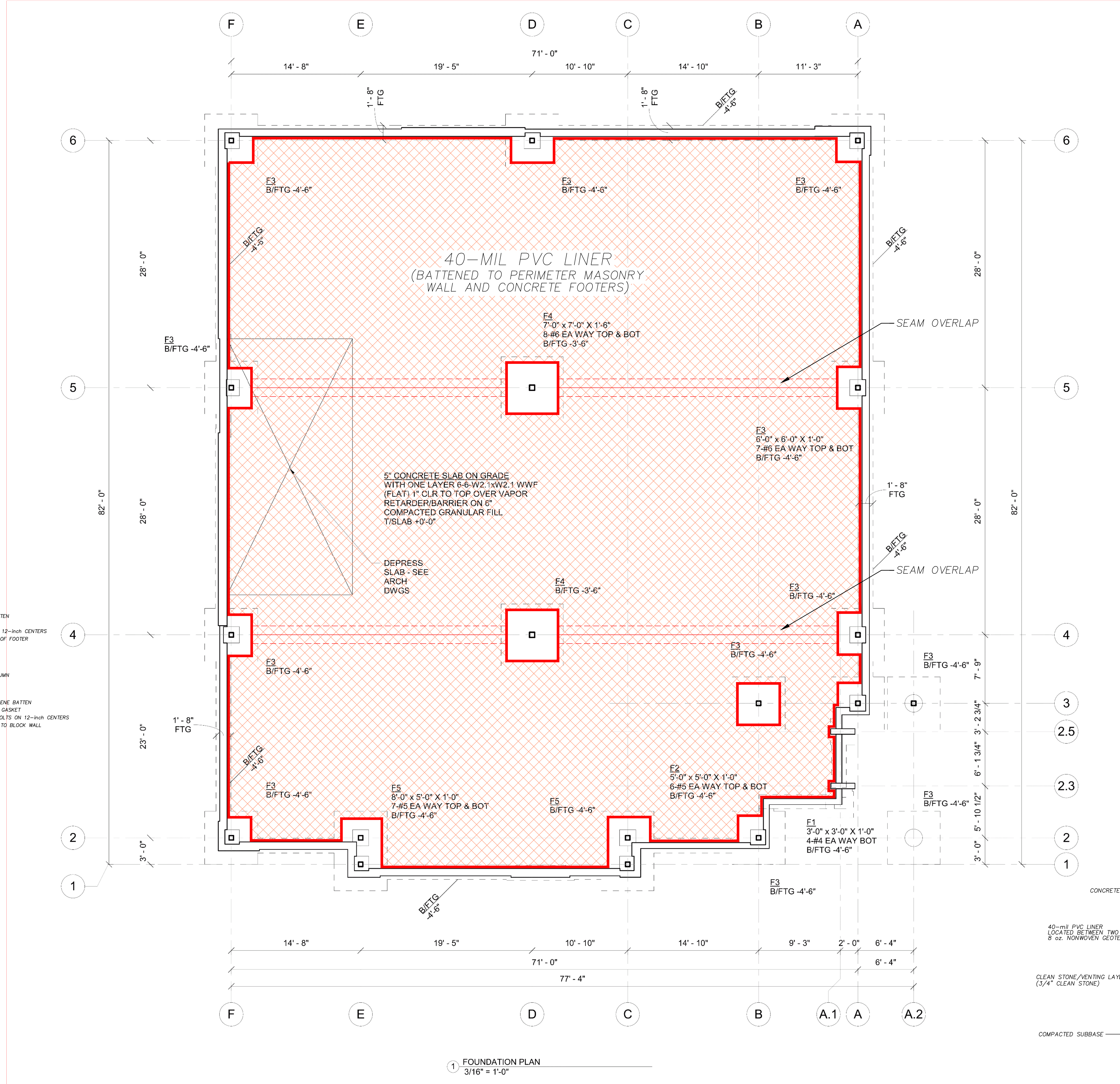
COLUMN FOOTER FASTENING DETAIL NOT TO SCALE



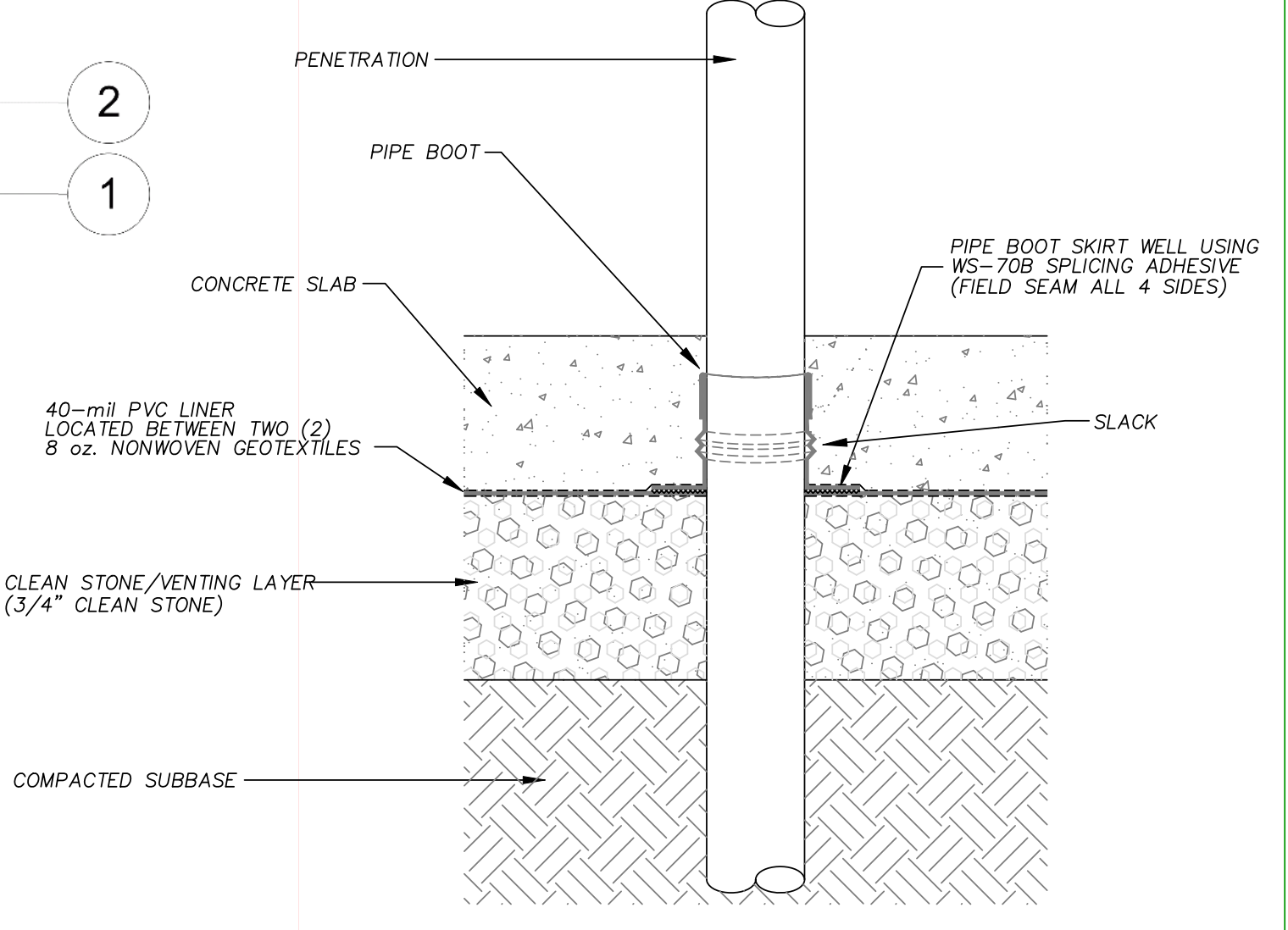
PERIMETER COLUMN BATTEN DETAIL NOT TO SCALE



SEAM DETAIL NOT TO SCALE



FOUNDATION PLAN 3/16" = 1'-0"



PENETRATION DETAIL NOT TO SCALE

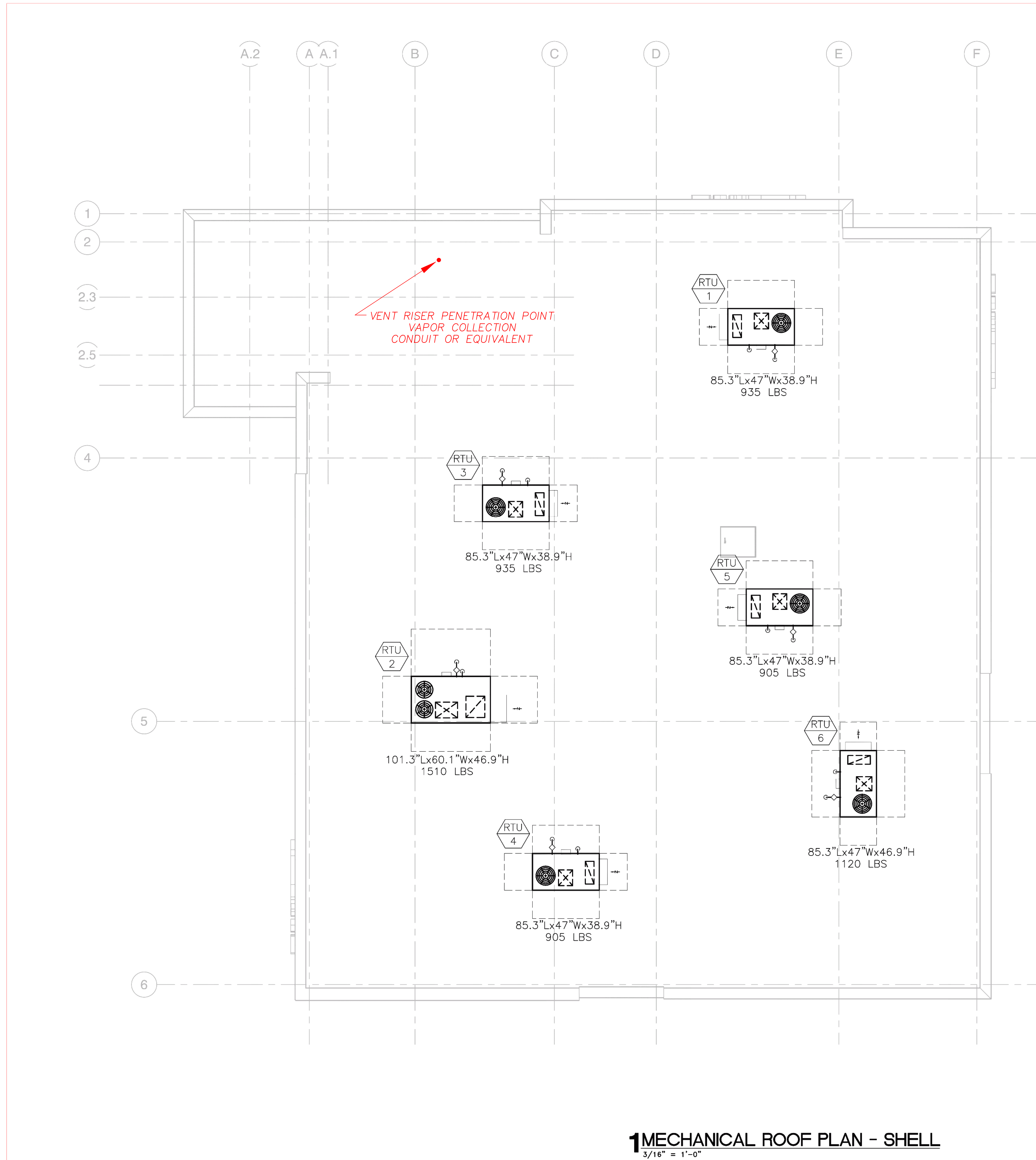
\\2016.110\ \VAPOR MITIGATION\CAD\PROPOSED VAPOR BARRIER SYSTEM PLAN

NOTES:


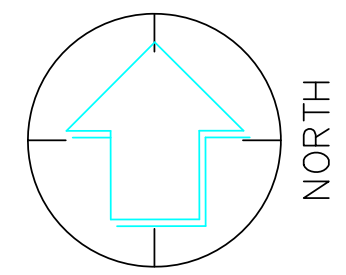
BASE PLAN OBTAINED FROM FOUNDATION PLAN PREPARED BY STUDIO GC, UNDATED.
SCALE IS APPROXIMATE AS THIS SITE PLAN IS INTENDED FOR ILLUSTRATIVE PURPOSES ONLY.

NOTES:

BASE PLAN OBTAINED FROM MECHANICAL ROOF PLAN-SHELL PREPARED BY STUDIO GC, UNDATED.
SCALE IS APPROXIMATE AS THIS SITE PLAN IS INTENDED FOR ILLUSTRATIVE PURPOSES ONLY.



1 MECHANICAL ROOF PLAN - SHELL
3/16" = 1'-0"

 <p>ENVIRONMENTAL CONSULTING, INC. 2002 RENAISSANCE BOULEVARD SUITE 110 KING OF PRUSSIA, PENNSYLVANIA 19406</p>	JOB No. 2016.110	DRAWN BY: ADH	SCALE: 3/16"=1'	FIGURE No. 3
	DATE: 2/9/17	CHECKED BY: RSW	TITLE: PROPOSED VAPOR COLLECTION SYSTEM ROOF PLAN	
<p>709 EAST CAPITOL DRIVE CITY OF MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN, 53212</p>				