



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

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April 14, 2017

**RECEIVED** Project No. 2016.110

Adam S. McIlheran, Hydrogeologist  
Remediation & Redevelopment Program  
Wisconsin Department of Natural Resources  
Southeast Region, Milwaukee Service Center  
2300 North Martin Luther King Drive  
Milwaukee, Wisconsin 53212

APR 17 2017

BY: \_\_\_\_\_

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

Dear Mr. McIlheran:

Environmental Consulting, Inc. is pleased to submit the following additional documentation in support for the Post-Closure Modification ("PCM") request for the above referenced property:

- Soil Management Plan (Revised), dated April 14, 2017;
- Draft Site-Wide Cap Maintenance Plan, dated April 14, 2017; and
- Draft Operation, Maintenance and Monitoring Plan (Vapor Collection and Vapor Barrier System), dated April 14, 2017.

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.



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

**DRAFT**

Telephone: (610) 279-7070

Facsimile: (610) 279-4334

## ***OPERATION, MAINTENANCE AND MONITORING PLAN***

**709 EAST CAPITOL DRIVE**  
**CITY OF MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN 53212**  
**BRRTS #02-41-2000169**  
**FID #241975140**

**Prepared by:**

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

**Prepared for:**

Adam McIlheran, Hydrogeologist  
Wisconsin Department of Natural Resources  
Southeast Region, Milwaukee Service Center  
2300 N. Dr. Martin Luther King Dr.  
Milwaukee, WI 53212

**DRAFT**

---

Samuel J Kucia  
Vice President

April 14, 2017

**DRAFT**

---

Richard S. Werner, P.G.  
President

Project No. 2016.110

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## 1.0 INTRODUCTION

Environmental Consulting, Inc. prepared this Operations, Maintenance and Monitoring (“OMM”) Plan to manage the vapor collection and vapor barrier system installed at the 709 East Capitol Drive property in the City of Milwaukee, Milwaukee County, Wisconsin, referenced hereinafter as the subject property. This OMM Plan was prepared in accordance with the Wisconsin Department of Natural Resources (“DNR”) Remedial and Interim Action Design, Implementation, Operation, Maintenance and Monitoring Requirements (i.e., N.R. 724). The OMM Plan establishes a written protocol to maintain and verify the proper operation of the vapor collection and vapor barrier system indicating continued system effectiveness in the mitigation of the vapor intrusion pathway on the subject property.

The subject property is located at the southeast corner of the intersection of East Capitol Drive and North Fratney Street with a Parcel ID of 274-9969-113-6. The property was part of an industrial facility known as Adelman Laundry and Novelty Dye Works dating back to the early 1900s. The sections of the former industrial facility previously located on the property were identified as office, dry cleaning, wash house, dry room and work room. A Burger King outparcel restaurant was located on the property from the mid-1980s until circa 2006. 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.

A vapor collection and vapor barrier system was installed on the subject property to prevent vapor intrusion into the recently constructed building from soil contaminated by petroleum compounds and chlorinated solvent compounds at depths ranging from two (2) feet below ground surface (“bgs”) to fifteen (15) feet bgs and groundwater contaminated by petroleum compounds and chlorinated solvent compounds located at depths ranging from approximately four (4) feet bgs to nine (9) feet bgs. The vapor mitigation system was installed to operate as a passive system or an active system.



## **2.0 SUB-SLAB VAPOR COLLECTION AND VAPOR BARRIER SYSTEM OVERVIEW**

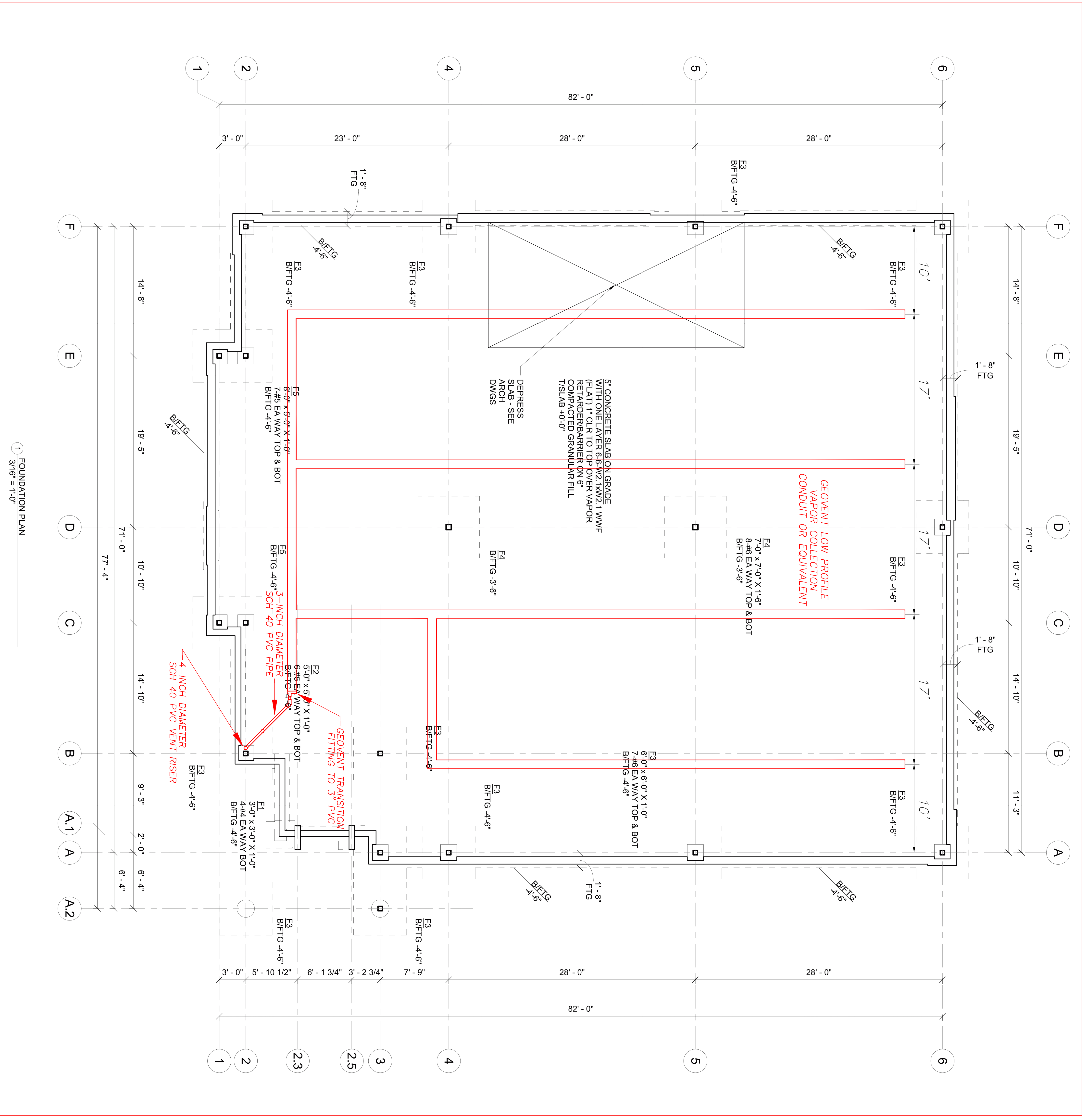
A sub-slab vapor collection and vapor barrier system was installed in the building on the subject property. The vapor barrier system consists of a heat welded 40-mil polyvinyl chloride (“PVC”) liner material located between two (2) layers of 8-ounce non-woven geotextiles per the manufacturer’s specifications. Figure 2-1 illustrates the vapor barrier system plan. The 40-mil PVC liner system was fastened to the perimeter masonry walls and concrete footers using polyethylene batten strips and neoprene gaskets with steel anchor bolts spaced on 12-inch centers. The vapor collection system, which is located beneath the vapor barrier, consists of a network of GeoVent vapor collection piping designed to provide adequate coverage of the sub-slab building area. The GeoVent piping leads to a transition fitting and 3-inch PVC pipe connected to a 4-inch PVC vent riser that runs vertically along the interior of the interior southeastern wall of the building. If necessary, vapors collecting beneath the vapor barrier will be collected in the GeoVent piping and vented to the atmosphere via one (1) RP265 Series in-line induction fan unit, which will be installed outside on top of the 4-inch diameter PVC riser piping above the roof. The fan unit can be turned off and disconnected from the vent riser for passive venting. The installation of the fan unit makes it possible for the system to become an active vapor mitigation system; with the fan unit in operation (i.e., active venting) the vapor mitigation system becomes active.

Figure 2-2 illustrates the vapor collection system plan and Figure 2-3 illustrates the vapor collection system roof plan.


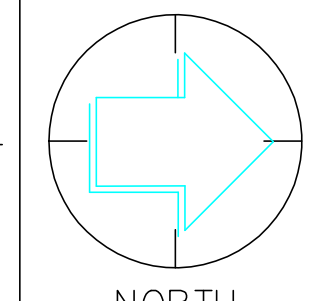
Two (2) sub-slab vapor sampling ports were installed during construction of the vapor collection and vapor barrier system. The two (2) vapor sampling ports each consist of nominal 0.75-inch diameter solid walled PEX tubing leading from an approximate 1 square foot section of GeoVent placed throughout the building footprint.

Soil vapor samples will be collected from the two (2) vapor sampling ports installed in the building. If the soil gas sample laboratory analytical results are below applicable Vapor Risk Screening Levels (“VRSLs”), then the vapor mitigation system installed in the building becomes voluntary and this OMM plan will not be required. If the soil gas sample laboratory analytical results are reported above VRSLs, then performance verification testing of the passive (or active) vapor collection and vapor barrier system will be completed. If necessary, the installed passive vapor mitigation system will become an active vapor mitigation system through the use of the one (1) RP265 Series in-line induction fan unit installed outside on top of the 4-inch diameter PVC riser piping above the roof.

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



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

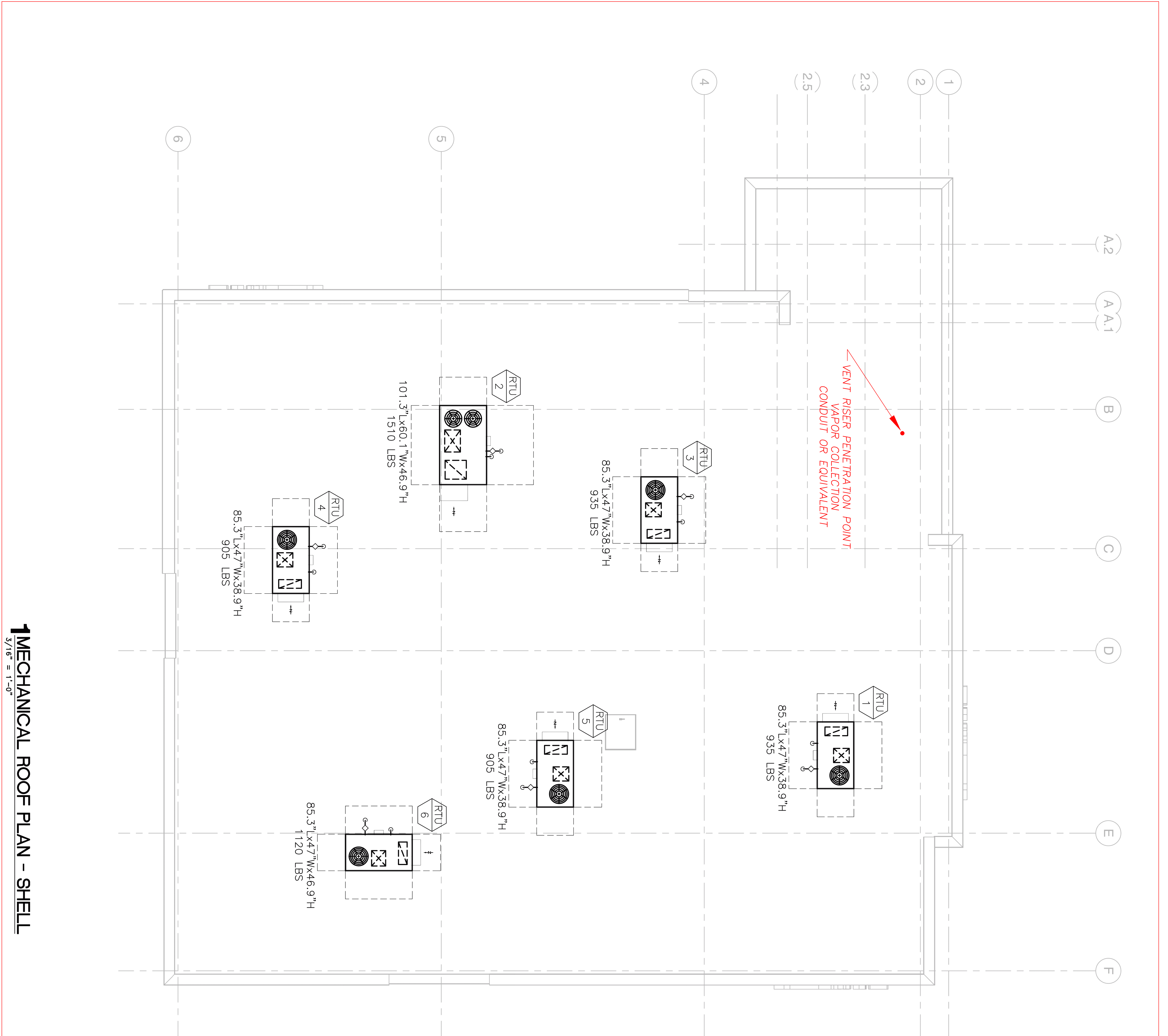
 ENVIRONMENTAL CONSULTING, INC. 2002 RENAISSANCE BOULEVARD SUITE 110 KING OF PRUSSIA, PENNSYLVANIA 19406	JOB No. 2016.110	DRAWN BY: ADH	SCALE: 3/16" = 1'	FIGURE No. 2-1
	DATE: 2/9/17	CHECKED BY: RSW	TITLE: PROPOSED VAPOR COLLECTION SYSTEM PLAN	
709 EAST CAPITOL DRIVE CITY OF MILWAUKEE, MILWAUKEE COUNTY,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




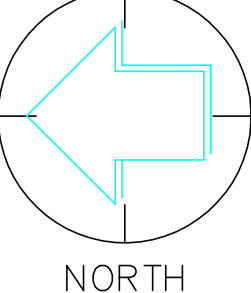




**NOTES:**  
 BASE PLAN OBTAINED FROM MECHANICAL ROOF PLAN-SHELL PREPARED BY STUDIO GC, UNDATED.  
 SCALE IS APPROXIMATE AS THIS SITE PLAN IS INTENDED FOR ILLUSTRATIVE PURPOSES ONLY.



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

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

### **3.0 OPERATION, MAINTENANCE AND MONITORING PROGRAM**

#### **3.1 Periodic Monitoring**

Monitoring of the sub-slab vapor collection and vapor barrier system will be performed on a monthly basis at the subject property. The monitoring consists of a visual inspection of the sub-slab vapor collection and vapor barrier system to confirm the following:

- condition of the one (1) RP265 Series in-line induction fan unit; and
- condition of the PVC piping associated with the vapor collection system.

Any damage to the system components (i.e., induction fan unit or PVC piping) or any malfunction of the system components will be addressed immediately. Any changes or repairs made to the sub-slab vapor collection and vapor barrier system should be documented and included with this OMM Plan.

#### **3.2 Annual Inspection**

On an annual basis, a comprehensive inspection of the sub-slab vapor collection and vapor barrier system on the subject property should be performed by qualified personnel. The purpose of the annual inspection is to ensure no significant site changes occurred between inspections and that the sub-slab vapor collection and vapor barrier system components have not changed or degraded creating a complete pathway for vapor intrusion. The annual inspection should confirm the following:

- condition of the aboveground PVC piping system;
- condition of the one (1) RP265 Series in-line induction fan unit;
- presence or absence of cracks or other disturbances in the concrete floor slab in the building;
- vent pipes are open; and
- changes in the uses of the tenant spaces.

Based on the observations made during the annual inspection, the Wisconsin DNR Continuing Obligations Inspection and Maintenance Log will be completed and included with this OMM Plan. A copy of the Wisconsin DNR Continuing Obligations Inspection and Maintenance Log is included in Appendix A.

**APPENDIX A**

**CONTINUING OBLIGATIONS INSPECTION AND  
MAINTENANCE LOG**

**Directions:** In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31-19.39, Wis. Stats.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at <http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site) Name 709 East Capitol Drive	BRRTS No. 02-41-200169
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Inspections are required to be conducted (see closure approval letter):

- annually
- semi-annually
- other – specify \_\_\_\_\_

When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent to the following email address (see closure approval letter):

Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maintenance	Previous recommendations implemented?	Photographs taken and attached?
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
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		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N

02-41-200169  
BRRTS No.

709 East Capitol Drive  
Activity (Site) Name

# Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (2/14)

Page 2 of 2

{Click to Add/Edit Image}	Date added:
Title:	

{Click to Add/Edit Image}	Date added:
Title:	





April 14, 2017

Adam McIlheran, Hydrogeologist  
Remediation & Redevelopment Program  
Wisconsin Department of Natural Resources  
Southeast Region, Milwaukee Service Center  
2300 N. Dr. Martin Luther King Dr.  
Milwaukee, WI 53212

**RE: Site-Wide Cap Maintenance Plan**  
**709 East Capitol Drive**  
**Milwaukee, Milwaukee County, Wisconsin 53212**  
**Parcel ID # 274-9989-113-6**  
**DNR BRRTS #02-41-200169**  
**FID #241975140**  
**GPS Coordinates: X=690792; Y=292759**

Dear Mr. McIlheran,

Environmental Consulting, Inc. is pleased to submit this Maintenance Plan for a site-wide cap at the above-referenced property in accordance with the requirements of s. NR 724.13 (2), Wis. Adm. Code. The maintenance activities relate to the existing site-wide cap which occupies the area over the contaminated groundwater and soil.

More site-specific information about this property/site may be found in:

- The case file in the DNR Southeast office
- BRRTS on the Web (DNR's internet based data base of contaminated sites)for the link to a PDF for site-specific information at the time of closure and on continuing obligations;
- RR Sites Map/GIS Registry layer for a map view of the site, and
- The DNR project manager for Milwaukee County.

### **Description of Contamination**

Soil contaminated by petroleum compounds and chlorinated solvent compounds is located on the subject property at depths ranging from two (2) feet below ground surface ("bgs") to fifteen (15) feet bgs. Groundwater contaminated by petroleum compounds and chlorinated solvent compounds is located at depths ranging from approximately four (4) feet bgs to nine (9) feet bgs. The extent of the soil and groundwater contamination is shown on the attached Figure (to be included in Final Maintenance Plan).

### **Description of the Site-Wide Cap to be Maintained**

The site-wide cap consists of a combination of a concrete building slab; asphalt and concrete pavement; and vegetated clean fill. The pavement section of the site-wide cap consists of approximately 4 inches of asphalt surface and binder overlying approximately 8 inches of aggregate

base. The sidewalk consists of approximately 5 inches of concrete surface overlying approximately 4 inches of aggregate base. The soil cover consists of approximately 6 inches of topsoil overlying approximately 18 inches of clay. The site-wide cap overlays the extent of the subject property as shown on the attached Figure (to be included in Final Maintenance Plan). A copy of the engineering specifications for the site-wide cap is attached (to be included in Final Maintenance Plan).

## Cover/Building/Slab/Barrier Purpose

The site-wide cap over the contaminated groundwater and soil serves as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. Based on the current commercial use of the property, the barrier should function as intended unless disturbed.

## Annual Inspection

The site-wide cap overlying the contaminated groundwater and contaminated soil and as depicted in Figure (to be included in Final Maintenance Plan) will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed and where infiltration from the surface will not be effectively minimized will be documented.

A log of the inspections and any repairs will be maintained by the property owner, (i.e., Form 4400-305, Continuing Obligations Inspection and Maintenance Log). The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the maintenance plan and inspection log will be kept at the site and will be available for submittal or inspection by Wisconsin Department of Natural Resources (“DNR”) representatives upon their request.

## Maintenance Activities

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling or larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment. The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored and disposed of by the owner in accordance with applicable local, state and federal laws.

In the event the site-wide cap overlying the contaminated groundwater and or contaminated soil is removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the DNR or its successor.

The property owner, in order to maintain the integrity of the site-wide cap will maintain a copy of this

Maintenance Plan at the site and make it available to all interested parties (e.g., on-site employees, contractors, future property owners, etc.) for viewing.

Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover/Barrier

The following activities are prohibited on any portion of the property where an engineered cap is required as shown on the attached Figure (to be included in Final Maintenance Plan), unless prior written approval has been obtained from the DNR: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; 6) construction or placement of a building or other structure; 7) changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings; or 8) changing the construction of a building that has a vapor mitigation system in place.

If removal, replacement or other changes to a cover, or a building which is acting as a cover, are considered, the property owner will contact the DNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of the DNR.

Contact Information

April 2017

Site Owner and Operator: Palestra Real Estate Partners, Inc.  
808 Montparnasse Place, Newtown Square, PA 19073  
(610) 986-3290

Signature: \_\_\_\_\_

Property Owner: Palestra Real Estate Partners, Inc.  
808 Montparnasse Place, Newtown Square, PA 19073  
(610) 986-3290

Signature: \_\_\_\_\_

Consultant: Environmental Consulting, Inc.  
2002 Renaissance Boulevard, Suite 110, King of Prussia, PA 19406  
(610) 279-7070

DNR: Adam McIlheran, Hydrogeologist – Remediation & Redevelopment Program  
2300 N. Dr. Martin Luther King Dr. Milwaukee, WI 53212  
(414) 263-8369

Location Map(s)

A location map will be included in the Final Maintenance Plan that will include the following:

- (1) the feature that requires maintenance;
- (2) the location of the feature(s) that require(s) maintenance: on and off the source property;
- (3) the extent of the structure or feature(s) to be maintained, in relation to other structures or features on the site;
- (4) the extent and type of residual contamination; and
- (5) all property boundaries.

Photographs of Cover/Barrier

Photographs documenting the condition and extent of the cover/barrier/building/slab at the time of the closure request will be included in the Final Maintenance Plan that will include the following:

- (1) a title on each photograph;
- (2) the site name and location of the feature; and
- (3) the date on which the photograph was taken.

Continuing Obligations Inspection and Maintenance Log

The attached Form 4400-305 will be utilized while performing the annual continuing obligations inspection.

**Directions:** In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31-19.39, Wis. Stats.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at <http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site) Name 709 East Capitol Drive	BRRTS No. 02-41-200169
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Inspections are required to be conducted (see closure approval letter): <input type="radio"/> annually <input type="radio"/> semi-annually <input type="radio"/> other – specify _____	When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent to the following email address (see closure approval letter):
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Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maintenance	Previous recommendations implemented?	Photographs taken and attached?
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02-41-200169  
BRRTS No.

709 East Capitol Drive  
Activity (Site) Name

# Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (2/14)

Page 2 of 2

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Title:



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

Telephone: (610) 279-7070

Facsimile: (610) 279-4334

## **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

April 14, 2017

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

Project No. 2016.110

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**APPENDICES**

Appendix A	Property Location Map
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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 in accordance with RR-709, will consist of a combination of concrete building slabs; asphalt and concrete pavement; and vegetated clean fill. The landscaped areas will be covered with two (2) feet of clean fill, which will consist of six (6) inches of top soil overlying 1.5 feet of clay. A demarcation barrier (e.g., geotextile fabric) will be placed between the clean fill barrier and the underlying soils.

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 grading calculations from the Client and the Client's design/construction representatives for the proposed development of the subject property, less than 100 cubic yards of surplus soil will be generated during the proposed construction activities that will require transportation off-site to a permitted facility for disposal. Depths of the proposed excavations (e.g., footers and utility trenches) on the subject property are expected to be less than four (4) feet below ground surface ("bgs"). In accordance with NR 718.12 (i.e., DNR RR-060), one (1) soil sample will be collected from the surplus soil stockpile and submitted to a certified laboratory for VOCs analysis.

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 further laboratory analysis, if required, 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. Management of contaminated soil during the redevelopment of the subject property will be completed in accordance with NR 718.2 and NR 718.5 (i.e., DNR RR-060).

## **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**



