State of Wisconsin DEPARTMENT OF NATURAL RESOURCES 1027 W. Saint Paul Avenue Milwaukee WI 53233

Tony Evers, Governor Preston D. Cole, Secretary Telephone 608-266-2621 Toll Free 1-888-936-7463



August 31, 2022

Mr. Bill Nicklas Mr. Jim Baumgartner D&C Partners, LLP W223 N7658 Cherry Hill Road Sussex, WI 53089 Via Electronic Mail Only to winicklas@gmail.com; jbaum777@gmail.com

Mr. Joe Deborkin Cudahy Holdings, LLC 13 Buntrock Avenue Thiensville, WI 53092 Via Electronic Mail Only to Joe@jomela.com

KEEP THIS LEGAL DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Case Closure with Continuing Obligations

Superior Linens-SW Corner Surface Spill, 5005 S. Packard Avenue, Cudahy, WI 53110

BRRTS #: 02-41-532649, FID #: 241780880

Dear Mr. Nicklas, Mr. Baumgartner, and Mr. Deborkin:

The Wisconsin Department of Natural Resources (DNR) is pleased to inform you that the Superior Linens case identified above met the requirements of Wisconsin Administrative (Wis. Admin.) Code chs. NR 700 to 799 for case closure with continuing obligations (COs). COs are legal requirements to address potential exposure to remaining contamination. No further investigation or remediation is required at this time for the reported hazardous substance discharge and/or environmental pollution.

However, you, future property owners and occupants of the property must comply with the COs as explained in this letter, which may include maintaining certain features and notifying the DNR and obtaining approval before taking specific actions. You must provide this letter and all enclosures to anyone who purchases, rents or leases this property from you. Some COs also apply to other properties or rights of way (ROWs) affected by the contamination as identified in the Continuing Obligation Summary section of this letter.

This case closure decision is issued under Wis. Admin. Code chs. NR 700 to 799 and is based on information received by the DNR to date. The DNR reviewed the case closure request for compliance with state laws and standards and determined the case closure request met the notification requirements of Wis. Admin. Code ch. NR 725, the response action goals of Wis. Admin. Code § NR 726.05(4), the case closure criteria of Wis. Admin. Code §§ NR 726.05, 726.09, 726.11, and Wis. Admin. Code ch. NR 140.

The Superior Linens site was investigated for the discharge of chlorinated solvents and other volatile organic compounds (VOCs) to the ground surface located outside the southwest corner of the main laundry building constructed in 1976 near the western property boundary. Soil contaminated with lead was also identified on the



northern and eastern portions of the property. Case closure is granted for the volatile organic compound (VOC) and lead contamination as documented in the case file. The site investigation and/or remedial action addressed soil, groundwater, and vapor. The remedial action consisted of excavation and offsite disposal of contaminated soil from along the western side of the main laundry building and the adjacent railroad right of way. Excavation of the contaminated soil was intended to address the direct contact risk posed by the contamination and to remove a significant source of groundwater and vapor contamination. Contamination remains in soil, groundwater, and vapor throughout the southwestern portion of the property and within the adjacent railroad right of way.

The case closure decision and COs required were based on the current use of the site for industrial purposes. The site is currently zoned limiting manufacturing district. Based on the land use and zoning, the site meets the industrial land use classification under Wis. Admin. Code § NR 720.05(5) for application of residual contaminant levels in soil.

SUMMARY OF CONTINUING OBLIGATIONS

COs are applied at the following locations:

ADDRESS (CITY, WI)	COS APPLIED	DATE OF MAINTENANCE PLAN(S)
5005 S. Packard Avenue, Cudahy, WI (Source Property)	Residual Soil Contamination	
1 2/	Cover (for soil)	May 1, 2022
	Residual Groundwater Contamination	
	Monitoring Wells could not be Properly Filled and Sealed	
	VI - Vapor Mitigation Systems	May 1, 2022
	VI - Commercial/Industrial Use	
	VI - Future Concern	
Railroad right of way west of 5005 S. Packard Avenue, Cudahy, WI	Residual Soil Contamination	
•	Residual Groundwater	
	Contamination	

CLOSURE CONDITIONS

Closure conditions are legally required conditions which include both COs and other requirements for case closure (Wis. Stat. § 292.12(2)). Under Wis. Stat. § 292.12(5), you, any subsequent property owners and occupants of the property must comply with the closure conditions as explained in this letter. The property owner must notify occupants for any condition specified in this letter under Wis. Admin. Code §§ NR 726.15(1)(b) and NR 727.05(2). If an occupant is responsible for maintenance of any closure condition specified in this letter, you and any subsequent property owner must include the condition in the lease agreement under Wis. Admin. Code § NR 727.05(3) and provide the maintenance plan to any occupant that is responsible.

DNR staff may conduct periodic pre-arranged inspections to ensure that the conditions included in this letter and the maintenance plans dated May 1, 2022 are met (Wis. Stat. § 292.11(8)). If these requirements are not followed, the DNR may take enforcement action under Wis. Stat. ch. 292 to ensure compliance with the closure conditions.

SOIL

Continuing Obligations to Address Soil Contamination

Residual Soil Contamination (Wis. Admin. Code chs. NR 718, NR 500 to 599, and § NR 726.15(2)(b) and Wis. Stat. ch. 289)

Soil contamination remains throughout the property. Chlorinated compounds and other volatile organic compounds were specifically located outside the southwest corner of the main laundry building, within the adjacent railroad right of way, and under the portion of the building constructed in 1976 and 2005 as indicated on the enclosed map (Figure B.2.B, Residual Soil Contamination, May 25, 2022). The extent of contaminated soil under the building is not precisely known and may extend over a greater area than what is estimated on this figure. If soil in the location(s) shown on the map is excavated in the future, the property owner or right of way holder at the time of excavation must sample and analyze the excavated soil. If sampling confirms that contamination is present, the property owner or right of way holder at the time of excavation will need to determine if the material is considered solid waste and ensure that any storage, treatment or disposal complies with applicable standards and rules. Contaminated soil may be managed under Wis. Admin. Code ch. NR 718 with prior DNR approval.

In addition, all current and future property owners, occupants and right of way holders need to be aware that excavation of the contaminated soil may pose an inhalation and direct contact hazard; special precautions may be needed to prevent a threat to human health.

Cover (for soil) (Wis. Stat. § 292.12(2)(a), Wis. Admin. Code §§ NR 724.13(1) and (2), NR 726.15(2)(d) and/or (e), NR 727.07(1))

The asphalt and concrete paving located adjacent to the southwest corner of the main laundry building, and the floors of the building portions constructed in 1976 and 2005, as shown on Figure 1, Extent of Soils Exceeding RCLs & Extent of Engineered Barrier, of the enclosed maintenance plan, dated May 1, 2022, shall be maintained in compliance with that plan. The purpose of the cover is to minimize the infiltration of water through VOC contaminated soil and prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

The cover approved for this closure was designed to be protective for commercial or industrial land uses. Before using the property for residential purposes and before taking an action, the property owner must notify the DNR to determine if additional response actions are warranted. A cover intended for industrial land uses or certain types of commercial land uses may not be protective if the property changes to a residential use. This may include, but is not limited to, single or multiple family residences, a school, day care, senior center, hospital or similar settings. In addition, a cover designed for multi-family residential housing use may not be appropriate for use at a single-family residence.

To modify or replace a cover, the property owner must submit a request to the DNR under Wis. Admin. Code ch. NR 727. The DNR approval must be obtained before implementation. The replacement or modified cover must be a structure of similar permeability or be protective of the revised use of the property until contaminant levels no longer exceed Wis. Admin. Code ch. NR 720 groundwater pathway residual contaminant levels and/or direct contact residual contaminant levels (RCLs).

GROUNDWATER

Continuing Obligations to Address Groundwater Contamination and/or Monitoring Wells

Residual Groundwater Contamination (Wis. Admin. Code ch. NR 140 and § NR 812.09(4)(w)) Groundwater contamination which equals or exceeds the enforcement standards for chlorinated volatile organic compounds and 1,4-dioxane is present throughout the southwest portion of the property and the adjacent railroad right of way, as shown on the enclosed maps (Figure B.3.B (1), Groundwater Isoconcentration (Shallow Glacial Till), September 1, 2021, and Figure B.3.B (2), Groundwater Isoconcentration (30-Foot Sand Seam), March 17, 2022). To construct a new well or reconstruct an existing well, the property owner must obtain prior DNR approval. Additional casing may be necessary to prevent contamination of the well.

Monitoring Wells could not be Properly Filled and Sealed (Wis. Admin. Code ch. NR 141 and § NR 726.15(2)(c)1.)

Monitoring well MW-4 located near the southwest corner of the main laundry building shown on the enclosed map, Figure B.3.D, Detailed Site Map, dated March 16, 2022, could not be properly filled and sealed because it was missing due to being paved over, covered or removed during site development activities. Your consultant made a reasonable effort to locate the well and to determine if it was properly filled and sealed. However, the well listed above is not located and remains open. You may be held liable under Wis. Stat. § 292.11 for any problems associated with the monitoring well if it creates a conduit for contaminants to enter groundwater. If the groundwater monitoring well is found, the owner of the property on which the well is located is required to properly fill and seal the well and submit the required documentation to the DNR.

VAPOR

Continuing Obligations to Address Vapor Contamination

Vapor intrusion (VI) is the movement of vapors coming from volatile chemicals in the soil or groundwater or within preferential pathways into buildings where people may breathe air contaminated by the vapors.

<u>VI - Vapor Mitigation Systems:</u> (Wis. Stat. § 292.12(2), Wis. Admin. Code § NR 726.15(2)(h), (i), (j) or (m)) Vapor mitigation systems, which may include vapor barriers, are used to interrupt the vapor pathway, thereby reducing or preventing vapors from moving into the building. Soil vapor beneath the southern portion of the main laundry building (the original portion constructed in 1976) building contains chlorinated VOCs at levels that would pose a risk to human health, if allowed to migrate into an occupied building on the property. See the enclosed map (Figure B.4.A, Vapor Intrusion Map, April 11, 2022).

A sub-slab depressurization system is located on the southwest corner of the main laundry building. Three sub-slab draw-points are installed through the building floor. An in-line fan draws vapors from the draw points and discharges it outside the building through a vertical riser pipe. The property owner shall maintain, operate and inspect the vapor mitigation system, installed in January 2013, in accordance with the enclosed maintenance plan, dated May 1, 2022. The building floor must also be kept in good repair to prevent vapors from migrating through the slab and to maintain the negative pressure produced by the operating mitigation system. System components must be repaired or replaced immediately upon discovery of a malfunction. The property owner shall document inspections on the VMS inspection log (Form 4400-321). See the Other Closure Requirements section of this letter for more details.

VI - Commercial/Industrial Use: (Wis. Stat. § 292.12(2), Wis. Admin. Code § NR 726.15(2)(k) or (m)) Soil vapor, soil, and groundwater beneath the main laundry building contains contamination at concentrations that pose a long-term risk to human health if allowed to migrate into an occupied building. Case closure is based on

the following site-specific exposure assumptions: industrial use with a well-maintained building floor and open building layout. Use of this property is restricted to the following uses: industrial. If changes in property or land use are planned, the property owner must evaluate whether the closure is protective for the proposed use. The DNR may require additional response actions. The property owner shall maintain the floor/building layout in accordance with the enclosed maintenance plan dated May 1, 2022.

VI - Future Concern: (Wis. Stat. § 292.12(2), Wis. Admin. Code § NR 726.15(2)(L) or (m), as applicable. Chlorinated VOCs remain in soil and groundwater throughout the southwestern portion of the property at concentrations that may be of concern for vapor intrusion in the future, if a building is constructed, renovated or expanded in an area where no building currently exists or if an existing building is remodeled. See the enclosed maps (Figure B.3.B (1), Groundwater Isoconcentration (Shallow Glacial Till), September 1, 2021, Figure B.2.B, Residual Soil Contamination, May 25, 2022, and Figure B.4.A, Vapor Intrusion Map, April 11, 2022). At the time of closure an approximately 32,000 sq. ft. building used as a commercial laundry is present in on the western portion of the property with two smaller buildings located on the southwest portion.

Vapor control technologies are required for new construction or for modification of occupied buildings on the property unless the property owner assesses the vapor pathway and the DNR agrees that vapor control technologies are not needed. The property owner shall maintain the current building use and layout.

See the Other Closure Requirements section for more details.

OTHER CLOSURE REQUIREMENTS

Maintenance Plan and Inspection Log (Wis. Admin. Code §§ NR 726.11(2), NR 726.15(1)(d), NR 727.05(1)(b)3., Wis. Admin. Code § NR 716.14(2) for monitoring wells)

The property owner is required to comply with the enclosed maintenance plan dated May 1, 2022 for the cover, to conduct inspections annually, and to use the inspection log (DNR Form 4400-305) to document the required inspections.

The property owner is also required to comply with the enclosed maintenance plan dated May 1, 2022 for the vapor mitigation system, to conduct inspections quarterly, and to use the inspection log (Form 4400-321 VMS Inspection Log) to document the required inspections.

The maintenance plans and inspection logs are to be kept up-to-date and on-site. The property owner shall submit the vapor mitigation system inspection log to the DNR annually, starting one year after the date of this letter, using the RR Program Submittal Portal. The property owner shall submit the cover inspection log to the DNR only upon request, using the RR Program Submittal Portal. See the DNR Notification and Approval Requirements section below for more information on how to access the Submittal Portal.

The limitations on activities are identified in the enclosed maintenance plan(s). The following activities are prohibited on any portion of this property where the barrier is required, without prior DNR approval.

- Removal of the existing barrier;
- replacement with another barrier;
- excavating or grading of the land surface;
- filling on capped or paved areas;
- plowing for agricultural cultivation;
- construction or placement of a building or other structure.

Pre-Approval Required for Well Construction (Wis. Admin. Code § NR 812.09(4)(w))

DNR approval is required before well construction or reconstruction for all sites identified as having residual contamination and/or COs. This requirement applies to private drinking water wells and high capacity wells. To obtain approval, the property owner is required to complete and submit Form 3300-254, Continuing Obligations/Residual Contamination Well Approval Application, to the DNR Drinking and Groundwater program's regional water supply specialist. A well driller can help complete this form. The form can be obtained online at dnr.wi.gov, search "3300-254." Additional casing may be necessary to help prevent contamination of the well.

General Wastewater Permits for Construction-related Dewatering Activities (Wis. Admin. Code ch. NR 200) The DNR's Water Quality Program regulates point source discharges of contaminated water, including discharges to surface waters, storm sewers, pits, or to the ground surface. This includes discharges from construction-related dewatering activities, including utility work and building construction.

If the property owner or any other person plans to conduct such activities, that person must contact the Water Quality Program and, if necessary, apply for the required discharge permit. If residual soil or groundwater contamination is likely to affect water collected in a pit/trench that requires dewatering, a general permit for discharge of *Contaminated Groundwater from Remedial Action Operations* may be needed. If water collecting in a pit/trench that requires dewatering is expected to be free of pollutants other than suspended solids, oil and grease, a general permit for pit/trench *Dewatering Operations* may be needed. Additional information can be obtained by visiting the DNR website at "dnr.wi.gov," search "wastewater general permits."

DNR NOTIFICATION AND APPROVAL REQUIREMENTS

Certain activities are limited at closed sites to maintain protectiveness to human health and the environment. The property owner is required to notify the DNR at least 45 days before and obtain approval from the DNR prior to taking the following actions (Wis. Admin. Code §§ NR 727.07, NR 726.15 (2), Wis. Stat. § 292.12(6)).

- Before removing a cover or any portion of a cover
- Before deciding to no longer use the vapor mitigation system, to shut off the fan or disrupt or abandon the vapor mitigation system, or before making any change to the vapor mitigation system or to a vapor barrier
- Before changing the use or occupancy to a different commercial or industrial use or to a residential exposure setting
- Before constructing a building and/or modifying use of or the construction of an existing building or changing property use. Certain activities are limited at closed sites to reduce the risk of exposure to residual contamination via vapor intrusion. For properties with a continuing obligation for addressing the future risk of vapor intrusion when buildings exist at the time of closure approval, changes to the current building use and layout are prohibited without prior DNR approval. This includes any change in building construction, reconstruction or partial demolition. The DNR may require additional actions may be required at that time to re-assess for vapor intrusion and mitigate, as appropriate.

The DNR may require additional investigation and/or cleanup actions if necessary, to be protective of human health and the environment. The case may be reopened under Wis. Admin. Code § NR 727.13 if additional information indicates that contamination on or from the site poses a threat, or for a lack of compliance with a CO or closure requirement. Compliance with the maintenance plan is considered when evaluating the reopening criteria.

SUBMITTALS AND CONTACT INFORMATION

Site, case-related information and DNR contacts can be found online in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW); go to dnr.wi.gov and search "BOTW." Use the BRRTS ID # found at the top of this letter. The site can also be found on the map view, Remediation and Redevelopment Sites Map (RRSM) by searching "RRSM."

Send written notifications and monitoring well filling and sealing forms to the DNR using the RR Program Submittal Portal at dnr.wi.gov, search "RR submittal portal"

(https://dnr.wi.gov/topic/Brownfields/Submittal.html). Questions on using this portal can be directed to the Project Manager below or to the environmental program associate (EPA) for the regional DNR office. Visit dnr.wi.gov, search "RR contacts" and select the EPA tab (https://dnr.wi.gov/topic/Brownfields/Contact.html).

CLOSING

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this this letter, please contact DNR project manager Paul Grittner at (414) 405-0764 or <u>paul.grittner@wisconsin.gov</u>.

Sincerely,

Pamela A. Mylotta

Calcylo

Southeast Region Team Supervisor Remediation & Redevelopment Program

Attachments:

Figure B.3.B (1), Groundwater Isoconcentration (Shallow Glacial Till), September 1, 2021

Figure B.3.B (2), Groundwater Isoconcentration (30-Foot Sand Seam), March 17, 2022

Figure B.2.B, Residual Soil Contamination, May 25, 2022

Figure B.3.D, Detailed Site Map, March 16, 2022

Figure B.4.A, Vapor Intrusion Map, April 11, 2022

Attachment D, Cover or Barrier Maintenance Plan, May 1, 2022

Inspection Log (DNR Form 4400-305)

Attachment D, Sub-Slab Depressurization System (SSDS) Operations & Maintenance Plan, May 1, 2022 Inspection Log (DNR Form 4400-321: Vapor Mitigation System Inspection Log)

cc: Steve Swenson – SM&A/Terracon (<u>steves@st-ma.com</u>)

Nick Swartz – Superior Health Linens (nswartz@superiorhealthlinens.com)

M. Andrew Skwierawski, Davis & Kuelthau, s.c. (askwierawski@dkattorneys.com)

Kevin Peterburs - Union Pacific Railroad (kjpeterb@up.com)

Additional Resources:

The DNR fact sheets listed below can be obtained by visiting the DNR website at "dnr.wi.gov," search the DNR publication number.

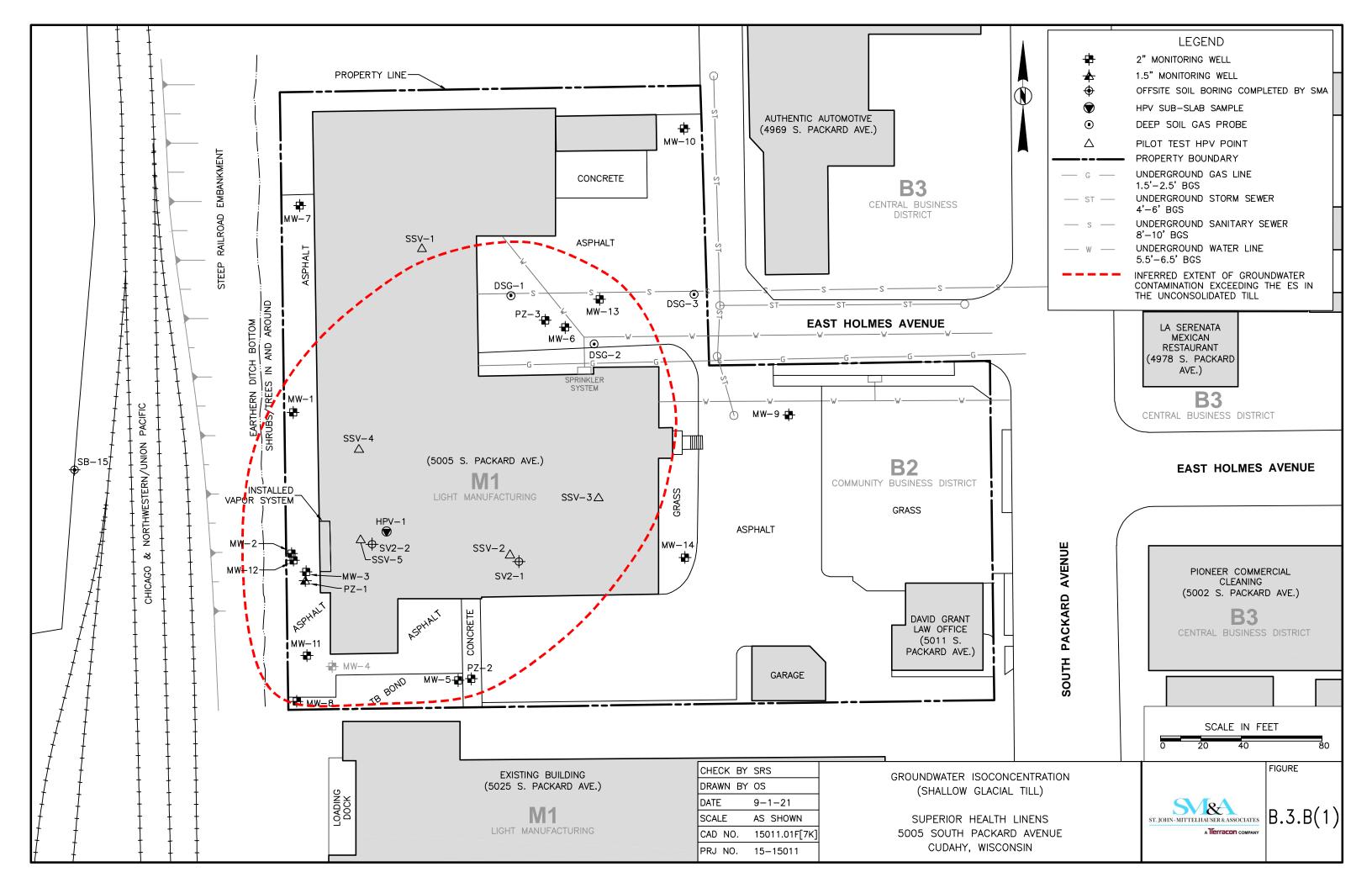
Guidance for Electronic Submittals for the Remediation and Redevelopment Program (RR-690)

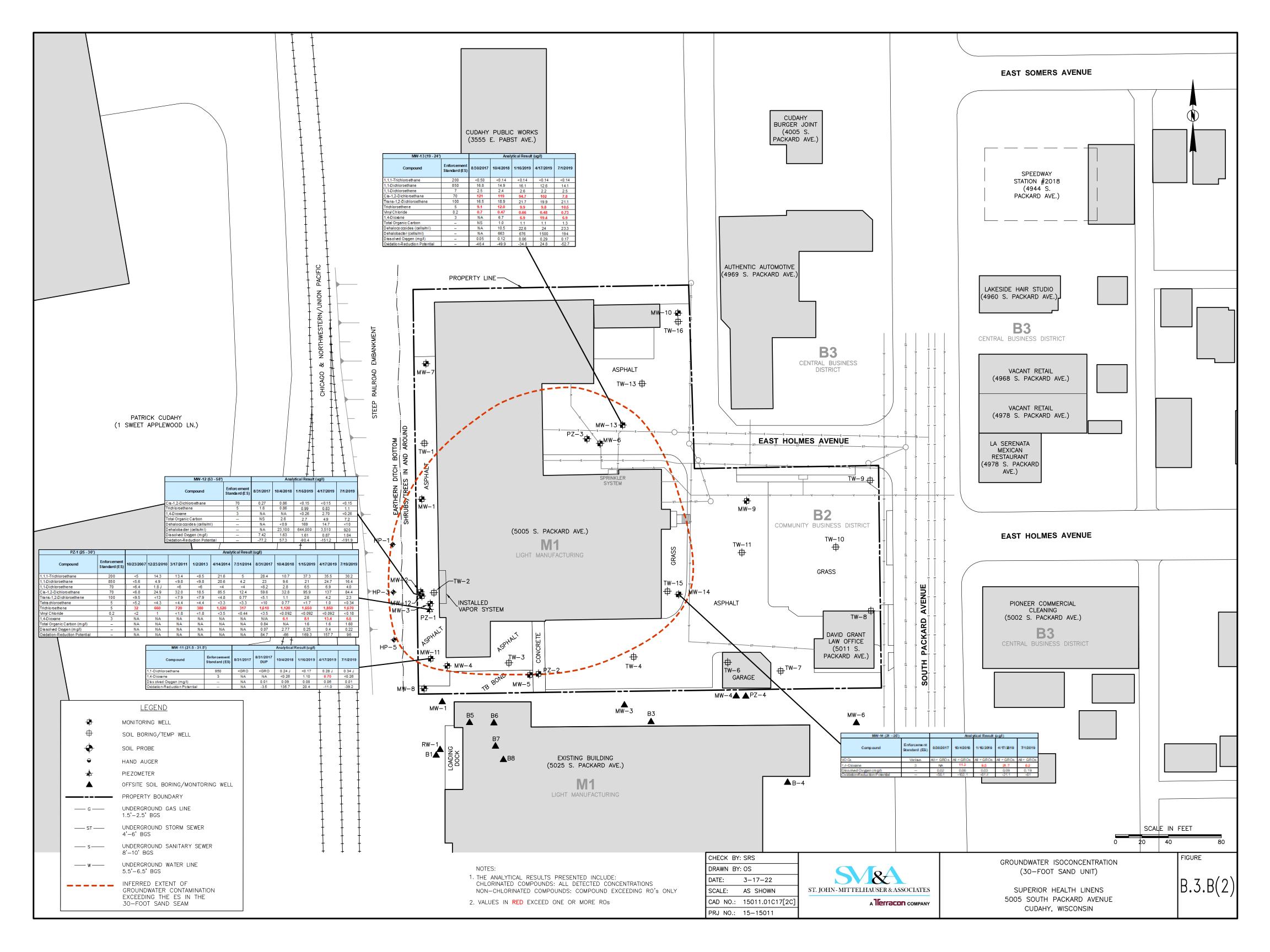
Continuing Obligations for Environmental Protection (RR-819)

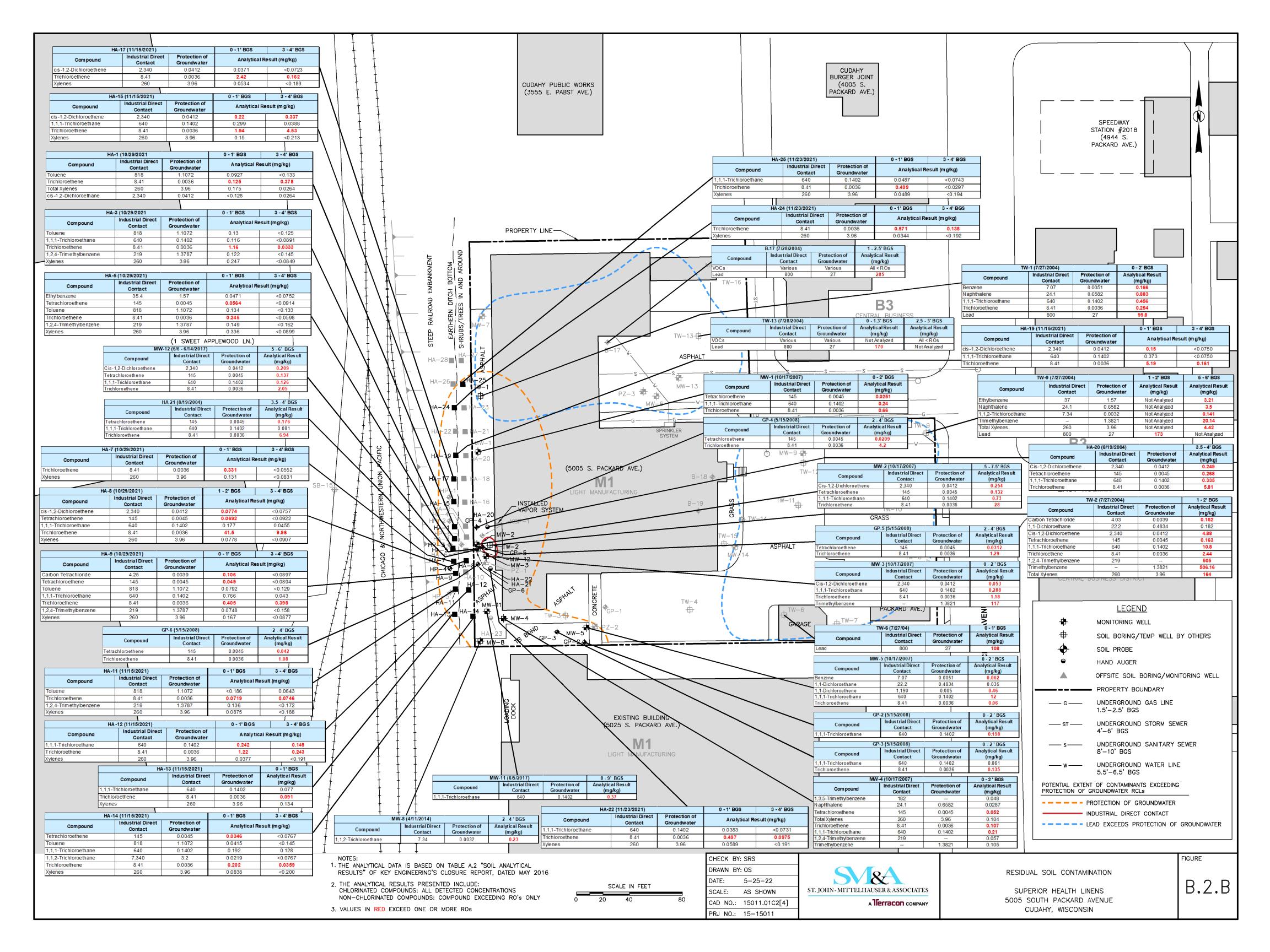
Environmental Contamination and Your Real Estate (RR-973)

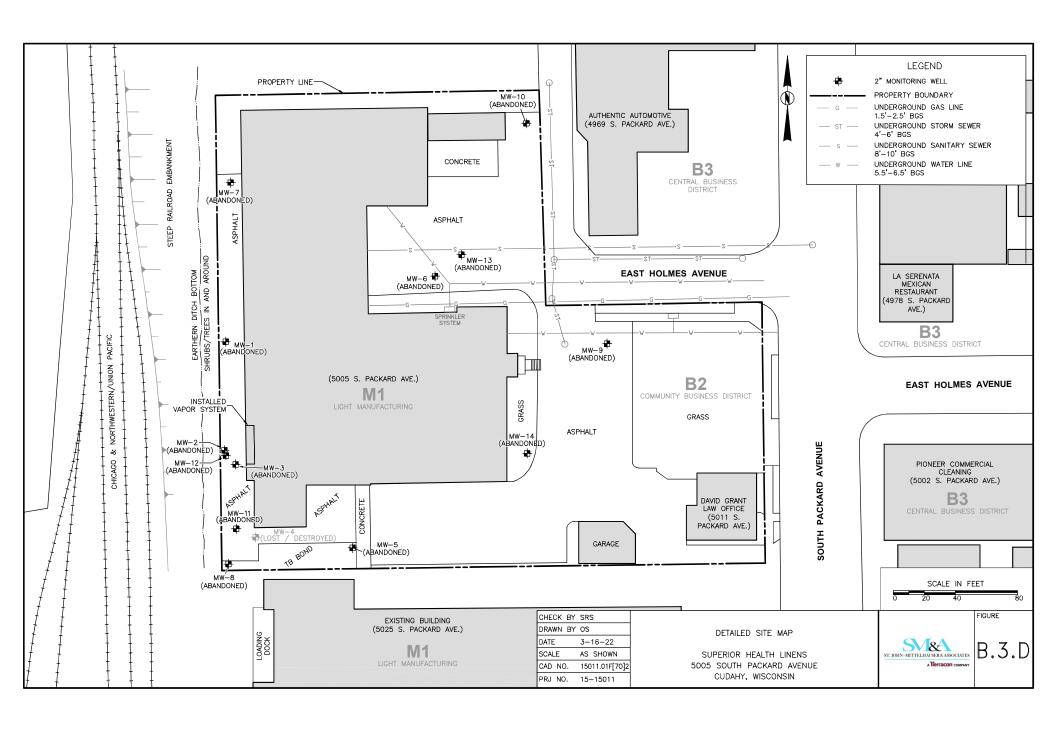
Post-Closure Modifications: Changes to Property Conditions after a State-Approved Cleanup (RR-987)

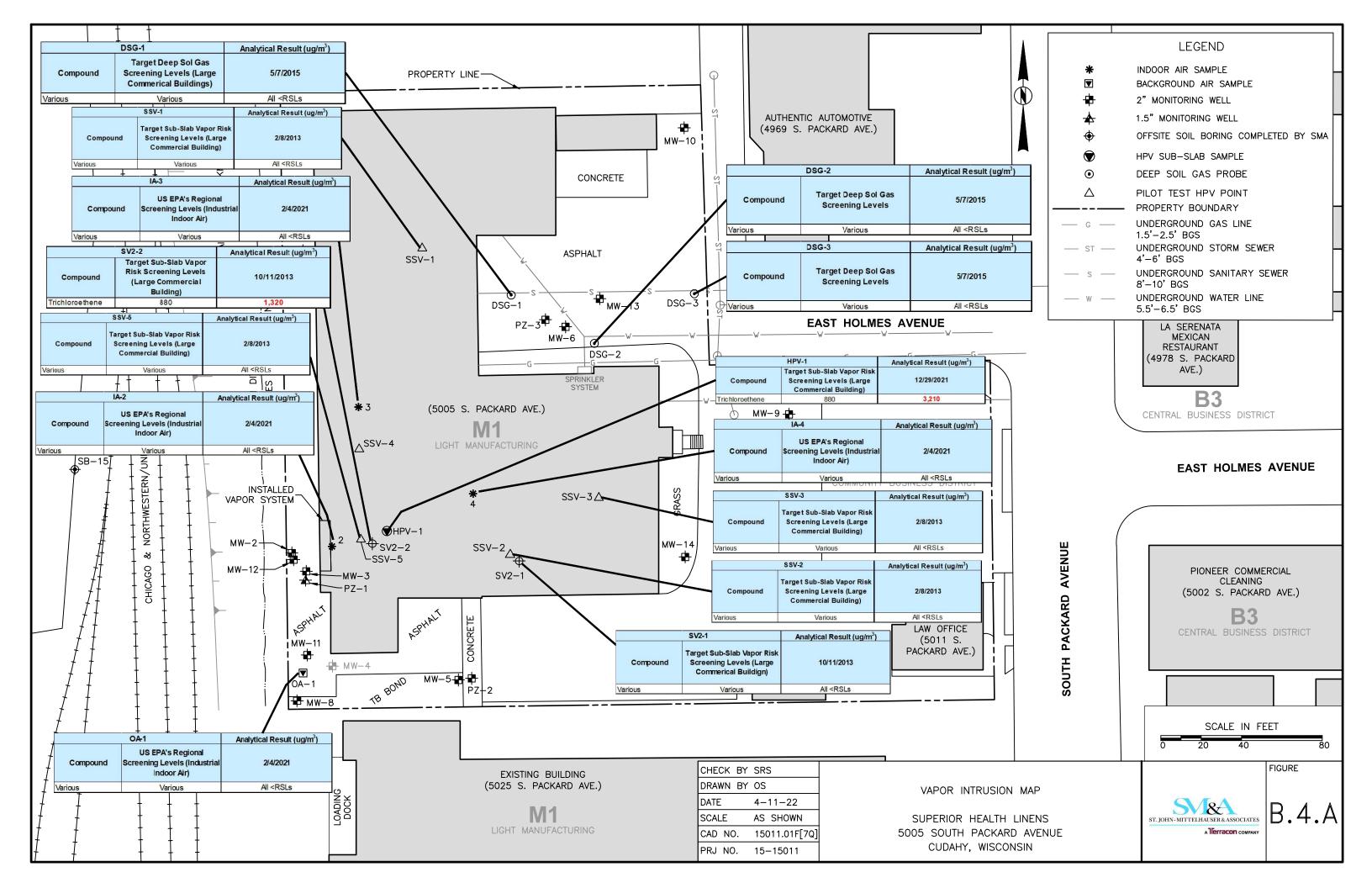
Using Natural Attenuation to Clean Up Contaminated Groundwater: What Landowners Should Know (RR-671)











COVER or BARRIER MAINTENANCE PLAN

May 1, 2022

Property Located at: 5005 South Packard Avenue, Cudahy, Wisconsin

FID#: **241780880**

WNDR BRTTS: #02-41-532649

LEGAL DESCRIPTION: CERTIFIED SURVEY MAP NO. 7617, Lot 1 NW 26-6-22

TAX PARCEL ID #: 6310088001

<u>Introduction</u>

This document is the Maintenance Plan for an engineered barrier consisting of asphalt pavement 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 asphalt pavement which addresses or occupies the area over the contaminated soil.

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

- The case file in the DNR Southeast office
- At http://dnr.wi.gov/topic/Brownfields/wrrd.html, which includes:
 - 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;
 - o RR Sites Map for a map view of the site, and
- The DNR project manager for Milwaukee County.

Description of Contamination

Soil contaminated by petroleum constituents (1,2,4-trimethylbenzene) is located at a depth within 4 feet of the ground surface between the west wall of the building and the Union Pacific Right of Way. In addition, soils containing chlorinated volatile organic compounds (CVOCs) exist in the soils at the southwest corner of the property and potentially extend under the southwest corner of the building. The extent of the soil contamination exceeding the direct contact RCLs and/or the protection of groundwater RCLs is shown on the Figure in Attachment D.2

<u>Description of the Engineered Barrier to be Maintained</u>

The engineered barrier to the south and west of the building consists of asphalt pavement, approximately 4-inches in thickness. The engineered barrier within the building footprint consists of approximately 4-inches of poured concrete. The location of the engineered barrier is shown on Figure in Attachment D.2. Photographs of the engineered barriers is provided in Attachment D.3

Engineered Barrier Purpose

The purpose of the engineered barrier is to prevent:

- Protection of human health by limiting contact with impacted soils exceeding the Direct Contact Residual Contaminant Level (RCL) for 1,2,4-trimethylbenzene; and
- Protection of groundwater by minimizing the infiltration of surface water within areas of impacted soil.

The extent of the soil contamination exceeding the direct contact RCLs and/or the protection of groundwater RCLs is shown on the Figure in Attachment D.2.

Annual Inspection

The engineered barrier overlying the contaminated soil and depicted on the Figure in Attachment D.2 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 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 will be documented.

A log of the inspections and any repairs will be maintained by the property owner and is included on Form 4400-305, Continuing Obligations Inspection and Maintenance Log. A copy of the log is provided in Attachment D.4. An electronic copy (fillable PDF) can be downloaded here: https://dnr.wisconsin.gov/topic/Brownfields/Professionals.html 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; or, if there is no acceptable place (for example, no building is present) to keep it at the site, at the address of the property owner and 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 (PPE). 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 law.

In the event the asphalt cap overlying the 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 asphalt cap, will maintain a copy of this Maintenance Plan at the site and make it available to all interested parties (i.e. 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 the Cover/Barrier is required as shown on the Figure in Attachment D.2, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 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.

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 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 DNR.

Contact Information (Effective May 1, 2022)

Site Owner

Cudahy Holdings, LLC

138 Buntrock Avenue Thiensville, WI 53092 Attn: Mr. Joe Deborkiø

(414) 240-1500

Signature

Site Operator:

Superior Health Linens

5005 South Packard Avenue

Cudahy, Wisconsin Attn: Mr. Nick Schwartz

(414) 769-0670

Consultant:

St. John - Mittelhauser & Associates, Inc.

1401 Branding Avenue Suite 315 Downers Grove, Illinois 60515

(630) 427-8100

Attention Mr. Steve Swenson

DNR:

Wisconsin Department of Natural Resources

Remediation and Redevelopment Bureau 2300 N. Dr. Martin Luther King Jr. Drive

Milwaukee, Wisconsin 53212

Attn: Mr. Paul Grittner, Hydrogeologist

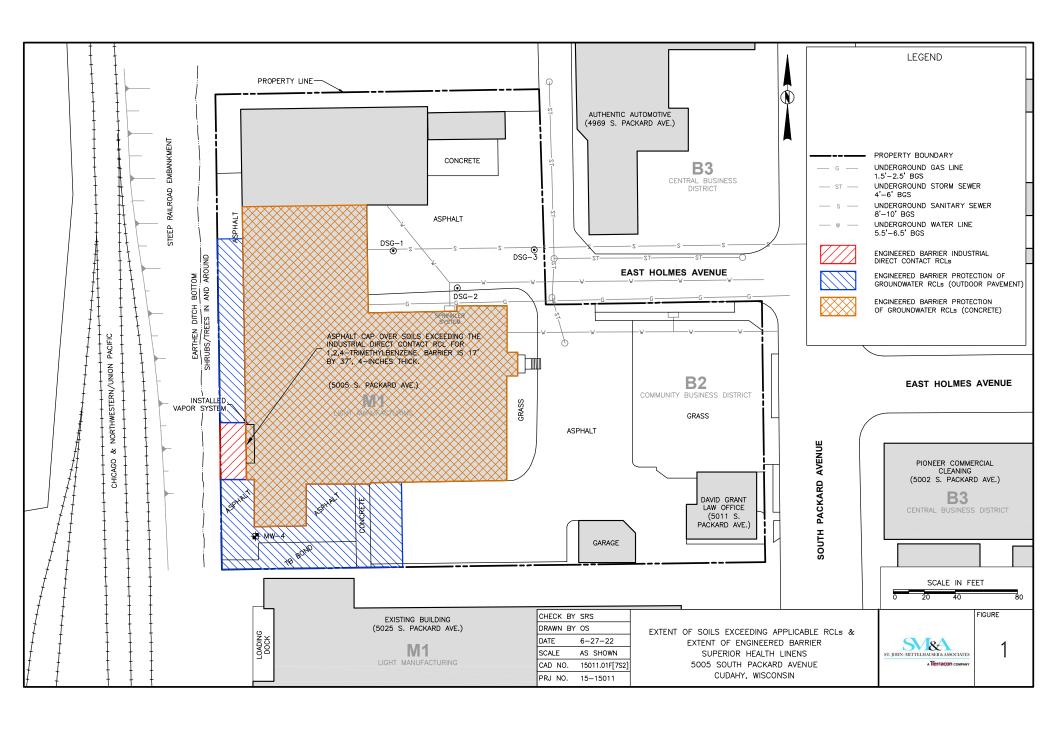
Attachments: D.2: Figure

D.3: Photographs of Engineered Barrier

D.4: Continuing Obligations Inspection and Maintenance Log

ATTACHMENT D.2

Figure 1: Extent of Soils Exceeding Applicable RCLs & Extent of Engineered Barrier



ATTACHMENT D.3

Photographs of Cover / Barrier



A TIETTOCON COMPANY

PHOTO LOG Superior Health Linens Engineered Barrier / Interior June 27, 2022 Cudahy, WI Project CQ157011



PHOTOGRAPH # 1 Taken on: 12/27/2021 Description: View of the concrete floor with sealed cracks within the southwest corner of the building.



PHOTOGRAPH # 2 Taken on: 12/27/2021 <u>Description</u>: View of the concrete floor within southwest corner of the building.



A TIETTOCON COMPANY

PHOTO LOG Superior Health Linens Engineered Barrier / Interior June 27, 2022 Cudahy, WI Project CQ157011



PHOTOGRAPH # 3 Taken on: 12/27/2021 Location/Direction: View of the concrete floor within southwest corner of the building.



PHOTOGRAPH # 4 Taken on: 12/27/2021 Location/Direction: View of the concrete floor within southwest corner of the building.



A TETTOCON COMPANY

PHOTO LOG
Superior Health Linens
Engineered Barrier / Exterior
Cudahy, WI
Project CQ157011



PHOTOGRAPH # 1 Taken on: 6/27/21

Description: View of engineered barrier along west side of building, facing northwest. Union Pacific Right-of-Way visible in the lower left (grass). White PVC vent pipe and blower associated with the Sub-Slab Depressurization System is visible in the center of the photo.



PHOTOGRAPH # 2 Taken on: 6/27/21

<u>Description</u>: View of engineered barrier along west side of building, facing south. Union Pacific Right-of-Way visible on the right side of the photograph.



PHOTO LOG
Superior Health Linens
Engineered Barrier / Exterior
Cudahy, WI
Project CQ157011





PHOTOGRAPH # 3 Taken on: 6/27/21

<u>Description</u>: Photo of engineered barrier along west side of building, facing north towards the former location of MW-7



PHOTOGRAPH # 4 Taken on: 6/27/21 Description: View of engineered barrier at the southwest corner of the property and along the southside of the building, facing east.

ATTACHMENT D.4

Continuing Obligations Inspection and Maintenance Log

State of Wisconsin Department of Natural Resources dnr.wi.gov

Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (R 7/20)

Page 1 of 2

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 Public 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	e) Name	<u> </u>				BRRTS No.	
Superior Heath Linens			02-41-532649				
Inspections are required to be conducted (see closure approval letter):			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 mainte		Previous commendations implemented?	Photographs taken and attached?
		monitoring well cover/barrier for soil sediment cap other:				OY ON	OY ON
		monitoring well cover/barrier for soil sediment cap other:			(OY ON	OY ON
		monitoring well cover/barrier for soil sediment cap other:			(OY ON	OY ON
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		monitoring well cover/barrier for soil sediment cap other:			(OY ON	OY ON

22-41-532649 Superior Heath Linens Activity (Site) Name			Continuing Obligations Inspection and Maintenance Log Form 4400-305 (R 7/20) Page 2 of				
{Click to Add/E	dit Image}	Date added:	{Click to	o Add/Edit Image}	Date added:		

Title:

Title:

Sub-Slab Depressurization System (SSDS) Operations & Maintenance Plan

1. VMS Description, Purpose and Location

Location

Superior Health Linens (SHL), 5005 South Packard Avenue, Cudahy Wisconsin FID #241780880 BRTTS #02-41-532649

Date of Maintenance Plan

May 1, 2022

System Description

This document is the design and maintenance plan for an active sub-slab depressurization system (SSDS) commonly known as a Vapor Mitigation System (VMS) at the above referenced property in accordance with the requirements of S. NR 724.13 (2) Wisconsin Administrative Code. The SSDS is located in the southwest corner of the plant as shown by the System Location Diagram on page 4. The SSDS is a very simple, yet very effective system for removing harmful vapors from beneath the plant floor and was designed to remove possible vapors from the primary soil contaminants defined below. The system utilizes an industrial fan to create negative sub slab pressure to draw contaminated vapors out and exhaust them to the exterior of the building (see VMS Diagram on page 3).

Primary Soil Contaminants

The primary contaminants in the soil are CVOC's, more specifically, Trichloroethene (TCE) and 1,1,1-Trichloroenthene (TCA). Breakdown products of TCE, cis-1-2 TCE has also been found in several soil samples.

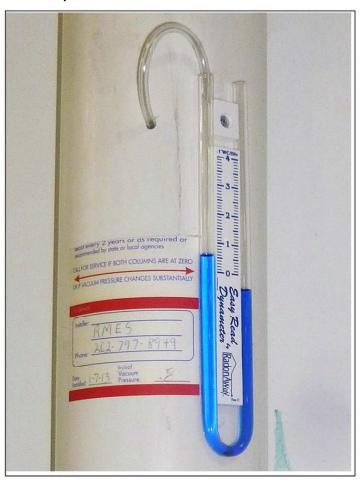
2. VMS Design

Construction Specifications

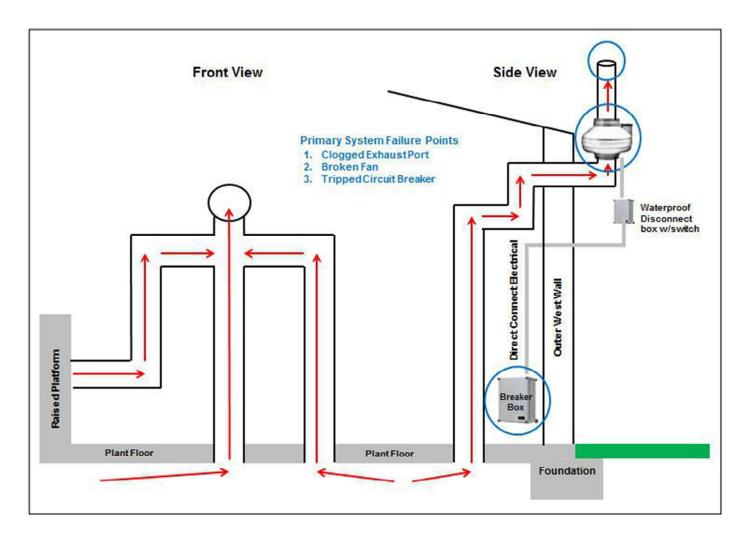
The Vapor Mitigation System is located in the southwest corner of the building (see VMS Location Diagram on page 4). Three 5" sub slab draw-points were bored through the interior cement floor of the building to expose sub-soil materials. These draw-points are placed as follows - one through the wall of the raised platform area, and two through the floor adjacent to the west factory wall, approximately 12" – 15" from the wall/foundation. The entire system is constructed of 4" Schedule 40 PVC material. The draw-points are connected by 4" risers that run vertical to a 4" manifold located on top of a ledge aproximately 7" off the floor. Another vertical riser runs from a central point in the manifold up approximately 3 feet and out through the sheet metal west wall to the exterior of the building. On the exterior of the building

the vertical riser continues to a height of approximately 17'. The Vapor Mitigation System is powered by a UL listed RadonAway RP265 fan (see Specification Sheet on page 9). A 45 degree 6" PVC angle is attached to the top of the fan to point the exhaust up and away from the building (see photos 1 – 6 on pages 5 - 9). Note – the louvers to the left of the of the vertical exhaust riser shown on photo 5, page 9 are exhaust louvers/fans. Power to the fan is supplied by a separate 20 amp circuit that is hard-wired to a weatherproof disconnect box/switch. An Easy Read Dynameter Manometer is installed on one of the draw point risers to measure sub-slab vacuum pressure (see below). The VMS is currently at .6WC on 4" pipe, which equate to about 290cfm. The concrete floor is in good sound condition. All cracks or gaps in the concrete floor that may affect the efficiency of the system or cause back drafting were filled.

Post VMS testing completed by Key Engineering and RMES shows excellent sub-slab communication. The "area of influence" of the system is approximately +3,500 sq. ft. or 35' to 40' from each draw point (see attached ATTACHMENT A).



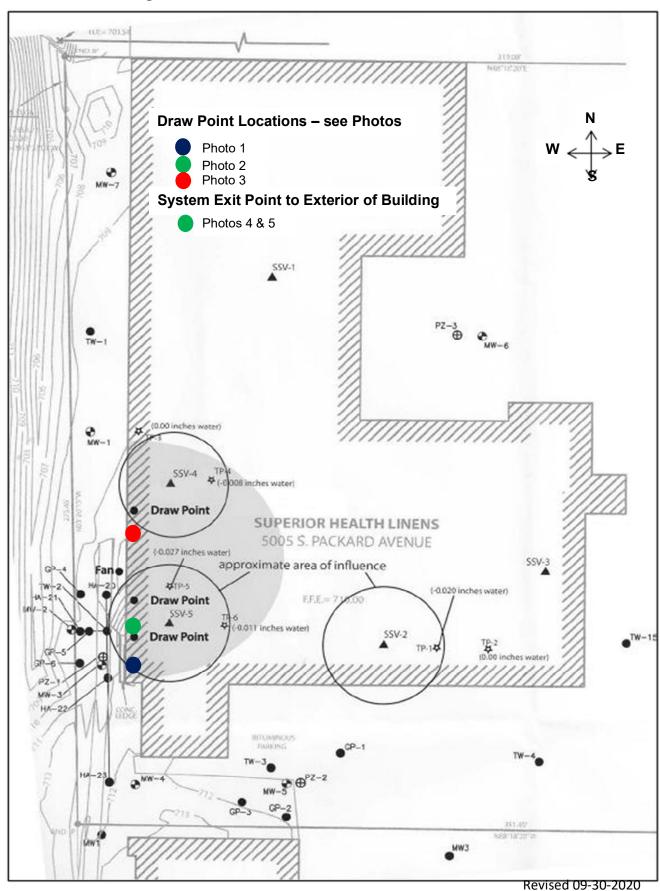
VMS Design Diagram



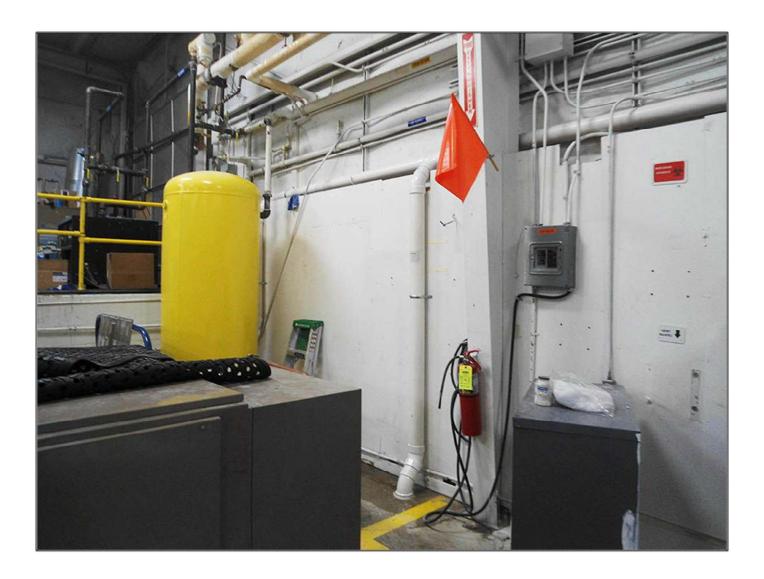
Failure/Monitoring Points

There are three primary potential areas where system failure can occur noted by the blue circles in the above VMS Design Diagram. 1) The external exhaust port could become clogged by debris; 2) The system fan could fail; 3) The circuit breaker could be tripped for some reason.

VMS Location Diagram









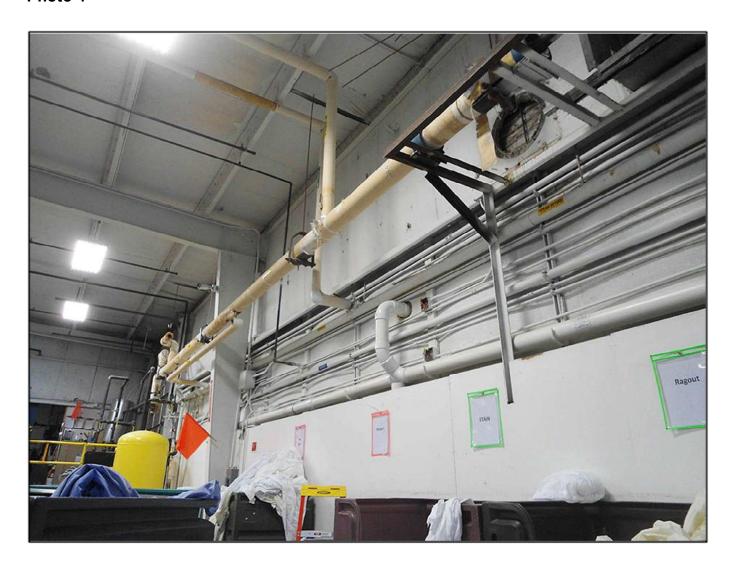


Photo 5

Note: louvers shown to the left of the vertical riser are exhaust louvers/fans

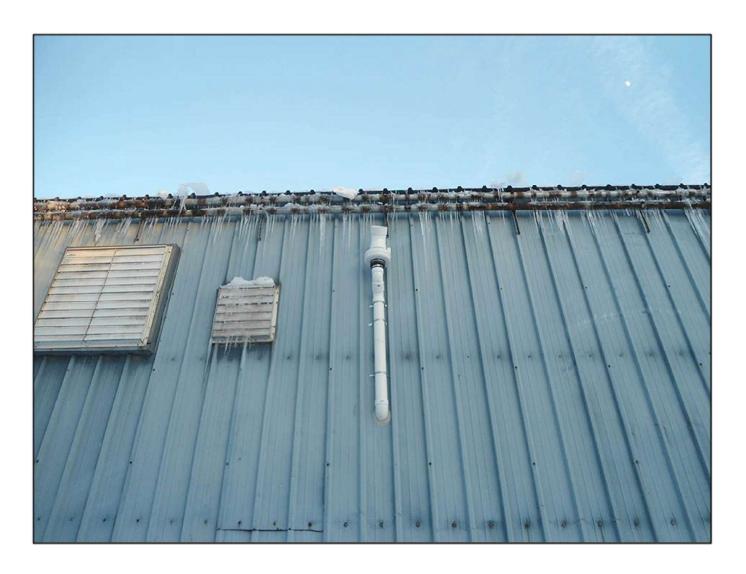
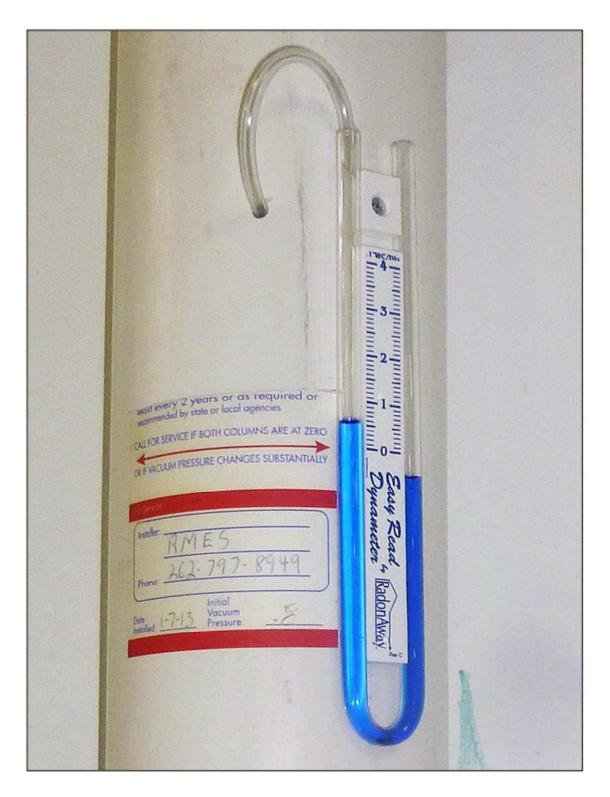


Photo 6
Manometer Installed on draw tube 3 as shown in Photo 3



3. VMS Maintenance

Required Maintenance of the VMS Fan/Blower

According to the manufacturer of the fan, there is no periodic maintenance required. The fan is an industrial model designed for exterior use. The motor is thermally protected. The fan body seams are sealed to inhibit vapor leaks and water intrusion, and the fan utilizes a water-hardened motorized impeller (see Fan Specification Sheet on page 12). The remaining elements of the system (PVC piping & electrical system) also do not require periodic maintenance.

Required Floor Maintenance

During the quarterly inspection of the system, the plant floor in the "area of influence", defined as 35' to 40' from the draw points, must also be inspected to make sure old and new cracks are sealed. Maintenance of the cracks will be logged on the SHL VMS Inspection Log Sheet shown below.

Reassess the VMS System Due to Changes in the Use of the Space

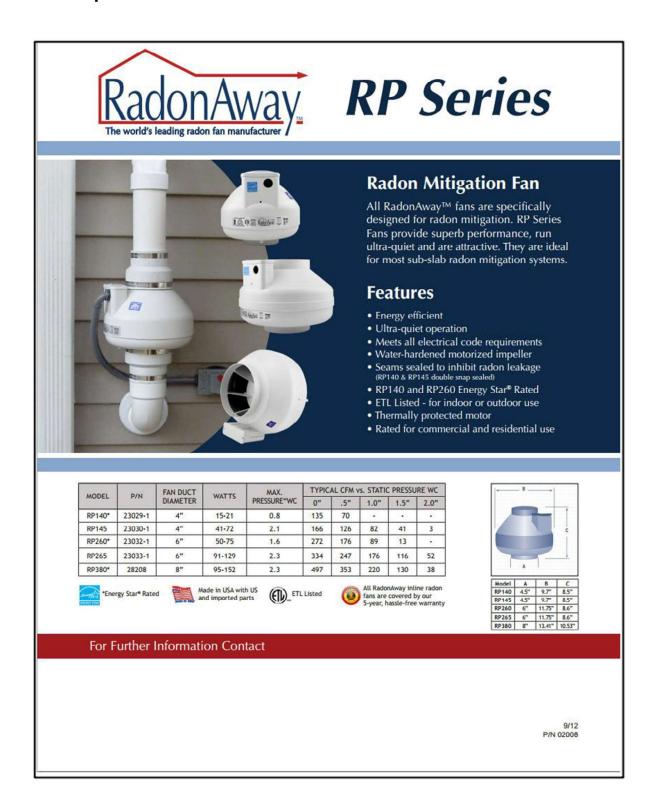
Vapor intrusion tests of the facility were done using both high and low volume testing methods throughout the plant. These tests were performed during February, the coldest month of the year in Wisconsin when the plant was completely closed up and the HVAC systems were operating (plant overhead door are open during the spring, summer and fall). In the high volume test, negligible CVOC were detected at each of the test points. In the low volume test, one of the test points in the southwest corner of the plant registered CVOC slightly higher than WDNR guidelines which is what precipitated installing a VMS. Based on these facts, we feel strongly that changes in use of the facility space would not require a reassessment of vapor intrusion or the Vapor Mitigation System.

System Changes/Removal

In case of the need for system removal or replacement, a written request to and a formal written approval document from the WDNR would be required prior to system removal. If removal or replacement is approved the sub-slab vapor will need to be reassessed and sub-slab vapor testing will be required.

Note: All maintenance and changes to the SHL Vapor Mitigation System will be logged in the Inspection and Maintenance Log, WDNR Form 4400-321. A copy of Form 4400-321 is provided in Appendix A.

Fan Specification Sheet



4. System & Plant Floor Inspection

The Vapor Mitigation System installed at 5005 South Packard Avenue is a very simple system. The only mechanical part of the system is the fan that draws air from the sub slab entry points shown in the VMS Design Diagram (page 3), System Location Diagram (page 4) and Photos 1, 2, & 3 (pages 5-7). Verification of an active and working system is also very easy and straightforward. In addition to making sure the VMS is operating properly, the plant floor will also be inspected to make sure that existing cracks and any new cracks are sealed properly. Cracks in the floor could reduce the effectiveness of the VMS.

System Operation Verification

<u>Step 1</u> – Inspect the plant floor in the "area of influence" (35' to 40' from each of the draw points for unsealed cracks. If cracks are found, seal them with a high grade silicon sealer.

<u>Step 2</u> - Inspect the Manometer to verify the system is maintaining negative sub slab pressure to .6 WC as shown on page 2. **If negative pressure is maintained, the system is operating properly.**

<u>Step 3</u> (if required) - If the Manometer <u>does not</u> show negative sub slab pressure of 0.6 WC check to make sure the tube running into the draw stack is not plugged. If plugged, clean out the tube and reinstall it into the draw stack. If negative pressure is maintained, the system is operating properly. If there is not negative pressure move on to step number 4.

<u>Step 4</u> (if required) - Check to make sure there is power to the fan by checking the circuit breaker. The fan is hard-wired directly to the fan and is on its own circuit. If the breaker <u>is</u> tripped, reset the breaker and make sure the system is operating properly by checking the Manometer for negative sub slab pressure. If the breaker immediately trips again, check the electrical circuit for a faulty breaker or possible short in the system. Once the electrical problem has been isolated and repaired, check the operation of the system by checking the Manometer for negative sub slab pressure.

<u>Step 5</u> (if required) - If the breaker is <u>not</u> tripped check the operation of the fan located on the exterior of the building (see photo 5 on page 9). If the fan is <u>not</u> operating properly check to make sure the cutoff switch on the waterproof box is in the "ON" position. If there is power to the fan then the issue is with the fan. Replace the fan with one of similar specification shown on page 12.

<u>Step 6</u> (if required) - If the fan<u>is</u> operating properly then inspect the vent stack to make sure nothing has blocked or prevented the sub slab air from being evacuated.

Revised 05/01/2022

Inspection Frequency

The operation of the Vapor Mitigation System will be checked <u>quarterly</u> at the beginning of the month (March 1st, June 1st, September 1st, and December 1st) by the maintenance staff employed by Superior Health Linens (SHL).

An <u>annual visual inspection</u> of the system will also be performed. All areas of the system including the concrete floor, sub-slab entry points, riser pipe joints and piping will be inspected for cracking, defect or general deterioration.

Should any obvious damage to the system be observed during inspection and/or if the system is no longer functioning, repair of the damaged components must be completed immediately.

An inspection log listing key inspection items such as inspector, date, items inspected, state of the system, parts replaced, repairs needed and when follow up was completed must be filled out during each inspection and maintained on-site and available for viewing by all interested parties. If any problem(s) with the system is identified in 2 or more successive inspections SHL maintenance personnel will notify the current owners of the property (William Nicklas & James Baumgartner) at that time. The owners will in turn notify the Remediation & Redevelopment Program Case Manager at the Wisconsin Department of Natural Resources (WDNR). The form used will be the WDNR Inspection and Maintenance Log – Form 4400-321.

5. Notifications

Where changes in land or property use or system changes are required to be reported, include contact names, phone numbers and email addresses for the DNR/agency with administrative authority:

Paul Grittner

Remediation & Redevelopment Program Case Manager

Wisconsin Department of Natural Resources 2300 N. Drive Martin Luther King Drive

Milwaukee, WI 53212-3128 Phone: (414) 405-0764

6. Contacts

Site Owner:

Cudahy Holdings, LLC 138 Buntrock Avenue

Thiensville, WI 53092

Attn: Mr. Joe Deborkin

(414) 240-1500

Signed

Building Lessee:

Superior Health Linens, Inc.

Nick Swartz

General Manager

5005 South Packard Ave.

Cudahy, WI 53110

Consultant:

St. John - Mittelhauser & Associates

Ronald B. St. John, PHG, CPG

Principal Hydrogeologist

Steven R. Swenson, P.G., CHMM

Senior Geologist

1401 Branding Ave, Suite 315 Downers Grove, IL 60515

Regulatory Authority:

Paul Grittner

Hydrogeologist - Remediation and Redevelopment Bureau

Wisconsin Department of Natural Resources

2300 N. Drive Martin Luther King Drive

Milwaukee, WI 53212-3128

Phone: (414) 405-0764

ATTACHMENT A

WI DNR VAPOR MITIGATION SYSTEM INSPECTION LOG

Form 4400-321 (R 03/22)

Note: To fill and save this form electronically, it must be opened using Adobe Reader or Acrobat software. Save a copy of the file, open Adobe Reader, select File > Open and browse for the file you saved.

State of Wisconsin Department of Natural Resources dnr.wi.gov

Vapor Mitigation System Inspection Log

Form 4400-321 (R 03/22)

Page 1 of 7

Notice: In accordance with s. NR 727.05(1)(b)3., Wis. Admin. Code, use of this form for documenting the inspections and maintenance of certain vapor-related 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 Public Records law [ss. 19.31-19.39, Wis. Stats.].

Directions: This form was developed to provide the results of a site inspection of a vapor related continuing obligation, typically a vapor mitigation system. See the 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 approval letter. The letter may be found in the database, <u>BRRTS on the Web</u>, by searching for the site using the BRRTS ID number and then looking in the "Action" section for code 56.

Activity (Site) Name: Sub Slab Depressurization	BRRTS No.:	02-41-532649						
Address Being Inspected (e.g., 123 N. Main St.):	5005 S. Packard Avenue, Cudahy, WI	Date of Inspection	:					
nspection Performed By (Name & Title/Company):								
When submittal of this form is required, submit an electronic version or a scanned copy of this completed form to the RR Submittal Portal.								
HOW TO USE THIS FORM The Activity (Site) Name, BRRTS No., Address Being Inspected and Date of Inspection entered above will auto-populate the table. Complete only the applicable rows/components. Check "Not Applicable" for components that do not apply. For example, if there is no sump sealed and vented as part of the system, check "Not Applicable" in the "NOTES" section for that component.								
Multiple components: For systems with multiple components	omponents (e.g., two manometers or two fans), add an additior	nal row for that component by clic	king the "+" (plus) symbol at the					

Photos: Click on the placeholder photo shown in each row to replace it with your own site-specific photo. Site-specific photos are optional but strongly recommended. Enter specific

end of the row. After a system component row is added, a "-" (minus) symbol is shown so the added row may be deleted.

details and observations within the "NOTES" section to assist the DNR in understanding status of the system components.

SYSTEM COMPONENT				Date of Inspection:
NAME	WHAT DOES IT DO?	WHAT DO I CHECK?	WHAT SHOULD I SEE?	WHAT TO FIX?
Manometer or Differential Pressure Gauge	Measures differential pressure between vacuum side of vent pipe and indoor space. This measurement confirms there is a vacuum being pulled by the fan.	Liquid Level on Manometer or Gauge	Liquid level in manometer should be offset (not level with each other).	A change in liquid level indicates a change in the vacuum below foundation. This could be caused by failure of fan, blockage of vent pipe, change in water level below building, or other conditions. Hire a professional to identify cause and repair if needed.
РНОТО			NOTES: (Record the reading Not Applicable	on the gauge. Identify specific building and location description:)
The state of the s				

Vapor Mitigation System Inspection Log Form 4400-321 (R 03/22) Page 2 of 7

Site Name: Sub Slab Depressurization System Inspection / Superior Health Linens

SYSTEM COMPONENT				Date of Inspection:
NAME	WHAT DOES IT DO?	WHAT DO I CHECK?	WHAT SHOULD I SEE?	WHAT TO FIX?
Fan	Fan creates a vacuum and lowers pressure below foundation. The fan also removes soil gases from below foundation for discharge to atmosphere.	Fan Operation Fan Location Motor Noise	Fan is on. Fan mounted outside & secure. Fan motor is quiet (loud motor may indicate problem).	Replace the fan immediately once the fan stops running. Fans typically run for 10-20 years, but it may be less. Replacement fan to have similar specifications as original with respect to flow and vacuum. After a fan is replaced, the system should be evaluated by a mitigation professional to verify effectiveness, which includes pressure readings. Original Fan Make and Model:
РНОТО			NOTES: (Identify specific bui	I Ilding and location description:)
			Not Applicable	

Vapor Mitigation System Inspection Log Form 4400-321 (R 03/22) Page 3 of 7

Site Name: Sub Slab Depressurization System Inspection / Superior Health Linens

SYSTEM COMPONENT				Date of Inspection:
NAME	WHAT DOES IT DO?	WHAT DO I CHECK?	WHAT SHOULD I SEE?	WHAT TO FIX?
Sustian Draw Baint w	Suction Point: Soil gases are collected in a void space below the foundation, and tight seal prevents	Suction Point Seal	Seal is air tight around pipe penetration.	if cracks or leaks appear.
Suction Drop Point w/ Vent Pipe	soil gas from getting inside the home. Vent Pipe: Pipe conveys the vacuum from the fan, and collects soil gases for discharge to the atmosphere.		Vent pipe is connected to fan, has not cracked.	If any piping or sealing of the system is altered or replaced, the system should be evaluated by a mitigation professional to verify effectiveness, which includes pressure readings.
РНОТО		•	NOTES: (Identify specific bui	lding and location description:)
			Not Applicable	

Site Name: Sub Slab Depressurization System Inspection / Superior Health Linens

Vapor Mitigation System Inspection Log Form 4400-321 (R 03/22) Page 4 of 7 Page 4 of 7

SYSTEM COMPONENT				Date of Inspection:
NAME	WHAT DOES IT DO?	WHAT DO I CHECK?	WHAT SHOULD I SEE?	WHAT TO FIX?
C	Sump Cover: Soil gases are collected in sump and the cover prevents soil gas from getting inside	Suction Point Seal	Seal is airtight to floor.	Sump cover or vent pipe may need to be sealed or replaced if cracks or leaks appear.
Sealed Sump w/Vent Pipe	home.		Vent pipe is connected to	If any piping or sealing of the system is altered or replaced, the
ripe	Vent Pipe: Pipe transports the soil gas from the sump for discharge to the atmosphere.	Vent Pipe Seal Condition	the sump cover and is not cracked.	system should be evaluated by a plumber or a mitigation professional to verify effectiveness, which includes pressure readings.
РНОТО			NOTES: (Identify specific bui	ilding and location description:)
			Not Applicable	

Vapor Mitigation System Inspection Log Form 4400-321 (R 03/22) Page 5 of 7

Site Name: Sub Slab Depressurization System Inspection / Superior Health Linens

SYSTEM COMPONENT				Date of Inspection:
NAME	WHAT DOES IT DO?	WHAT DO I CHECK?	WHAT SHOULD I SEE?	WHAT TO FIX?
Outdoor Vent Pipe	Pipe transports the soil gas from beneath the foundation for discharge to the atmosphere.	Vent Pipe Condition Vent Pipe Location	Vent pipe remains connected to fan. End of pipe free from obstructions. The exhaust is more than 15 feet from windows or air intakes.	Vent pipe may require replacement, or cleaning to remove ice or debris. If any piping or sealing of the system is altered or replaced, the system should be evaluated by a mitigation professional to verify effectiveness, which includes pressure readings.
РНОТО			NOTES: (Identify specific bui	lding and location description:)
			Not Applicable	

Site Name: Sub Slab Depressurization System Inspection / Superior Health Linens

Vapor Mitigation System Inspection Log Form 4400-321 (R 03/22) Page 6 of 7

SYSTEM COMPONENT				Date of Inspection:
NAME	WHAT DOES IT DO?	WHAT DO I CHECK?	WHAT SHOULD I SEE?	WHAT TO FIX?
Foundation Floor	Foundation is a barrier that minimizes soil gas entry into building, and helps fan to work efficiently.	Foundation Condition Foundation Footprint	No penetrating cracks or holes in foundation. Check if there have been alterations or additions to building or footprint.	Seal cracks or other penetrations as you would to prevent water from entering. If building floor plan has changed, notify DNR and contact a mitigation professional to evaluate if modifications to the vapor mitigation system are necessary.
РНОТО			NOTES: (Identify specific bui	ilding and location description:)
PHOTO			Not Applicable	

Vapor Mitigation System Inspection Log Form 4400-321 (R 03/22) Page 7 of 7

Site Name: Sub Slab Depressurization System Inspection / Superior Health Linens Address Being Inspected: 5005 S. Packard Avenue, Cudahy, WI

SYSTEM COMPONENT				Date of Inspection:
NAME	WHAT DOES IT DO?	WHAT DO I CHECK?	WHAT SHOULD I SEE?	WHAT TO FIX?
Sub Slab Vapor Port	This is a sample port to measure vacuum or take sample of soil gas if needed. It needs to remain sealed when not in use to prevent soil gas entry into the home.	Port Seal/Cap	If able to measure the vacuum with a micromanometer, the pressure differential should be at least 0.004 inches of H ₂ O or at least one Pascal. Port is sealed and capped when not in use.	Repair or replace the seal and cover as needed.
		Port Condition	When not in use.	Permanently seal hole if sample port is ever removed.
PHOTO			NOTES: (If taken, record the description:) ☑ Not Applicable	pressure differential reading. Identify specific building and location