June 13, 2022

FRIESS ENVIRONMENTAL CONSULTING, INC.

Mr. Greg Michael
Wisconsin Department of Natural Resources
1027 West St. Paul Avenue
Milwaukee, WI 53233

RE: Additional Documentation for the Remedial Action Plan for the South of National Avenue (SoNa) Property Formerly the 700 Series Properties (Parcel 705) in West Allis, Wisconsin — FEC Project No. 210807; DNR FID No. 341117040; BRRTS No. 02-41-544080

Dear Mr. Michael:

As requested, ***Friess Environmental Consulting (FEC)*** has prepared this letter to provide additional information requested in your letter dated March 11, 2022, to allow you to complete your remedial action plan evaluation and response.

Project Background

Site investigation activities have been conducted at various times over the past 17 years and documented in the Site Investigation/Remedial Action Plan dated September 2005, and later in the Remedial Action Design/Partial Site Remediation Report dated May 2012. FEC submitted a site investigation (SI) summary and remedial action plan (RAP) to the DNR on November 19, 2021. The DNR reviewed the RAP and requested additional items (below) in their letter dated March 11, 2022. The RAP was conceptually approved by the DNR in their letter dated March 16, 2022, subject to receipt of additional information. The additional items are presented below.

> "The DNR requested better information documenting the extent of the contaminated fill and soil and current placement of those soils considering past soil management activities and the general presence of site-wide fill. Evaluate how soil management may have changed the limits of contamination. Also, whether the sampling conducted accurately evaluated the potential for contaminated fill to be in all areas of the site. Discuss why PAH contamination may only be limited to certain portions of the site."

The historic fill was investigated in 2006 and included collecting soil samples from twenty-eight (28) soil borings (SB-25 to SB-52) across the Site. The sampling strategy was to evaluate the entirety of the parcel through a grid pattern sampling plan. Fill material is present across the entire site; however, impacts within the shallow fill were found to be highly variable. There were areas of fill with impacts and areas of clean fill present across the site, as well as areas containing foundry sand materials and areas without any foundry sands. The subsequent thorough documentation of soil management activities at the site, and lack of import or

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export of materials to/from the site but for one DNR approval transfer from an adjoining site serve to simplify the understanding of the location of the fill materials and related risks associated with the fill material. The highly variable make-up of the fill material is the reason PAH contamination was determined to be limited to only certain portions of the site. In response, the remedial strategy calls for capping the entire parcel to eliminate potential risks associated with the direct contact with the fill material.

> "Provide an estimate of how many yards of contaminated soil and other solid waste will be reused on site. This is required by NR 718.12(2)(b)2 and will be necessary to determine compliance with NR 718.12(1)(e)."

There is approximately 9,000 cubic yards of material that were excavated and stockpiled on the southern portion of the SoNa site during site grading, the excavation of the initial building foundation, and excavation of the stormwater retention pond in the southwest portion of the site. Approximately 4,000 cubic yards of these soils are proposed to be placed along the eastern portion of the proposed building in accordance with NR 718.12 and capped. These soil management activities are illustrated on the attached Figure 13. These soils are proposed to be capped with concrete or asphalt.

The remaining 5,000 cubic yards are proposed for disposal at an off-site location. Additional soil sampling will be conducted in accordance with NR 718.12(1)(e). The exemption request for these soils will be submitted under separate cover at a later date.

Finally, two other stockpiles have been formed comprised of the material transferred over from the former Pressed Steel (NoNa) site pursuant to the DNR approval (BRRTS # 02-41-385114). In addition, approximately 5,300 cubic yards of this material imported from the former Pressed Steel site will be reused as capping material for the redevelopment and managed on-site. This material is further discussed below.

> "Between 4,000-6,000 yards of soil was imported from the Pressed Steel site, presumably as an exempt waste as the DNR did not approve the reuse of the material. The RAOR proposes excavating a portion of this soil and managing it on-site and off-site. To confirm that this material will be managed appropriately, provide the sample results and other information that was originally used to characterize the material and explain why it can be managed as an exempt waste. If an exempt waste, it can be managed offsite without DNR approval. If this material is not an exempt waste, and is proposed to be used offsite, the materials management request will need to be updated to reflect this additional reuse property by including the needed fees, signatures from the offsite property owners, etc."

The construction documentation report and soil sampling results for the former Pressed Steel Site indicate that the soils that did not contain concentrations of

VOCs or PAHs that exceed the direct-contact RCLs were segregated and utilized as part of the soil cap across the Site, and/or placed on Parcel 705 (SoNa site). As such, it appears that this material is an exempt solid waste.

Approximately 10,224 cubic yards (864 truckloads) of cover soil were excavated from the former Pressed Steel site and stockpiled on SoNa site. The excavated soil originated from areas with contaminant concentrations that did not exceed the non-industrial direct contact RCLs. Approximately 4,600 cubic yards of this soil stockpile were transported back to the parcels north of National Avenue and approved for use as cover material above the PCB- and PAH-affected soils. As such, approximately 5,600 cubic yards remained on the SoNa site.

The 4,600 cubic yards of materials were detailed in the soils management plan for the former Pressed Steel site and used as capping material on that site. The remaining 5,600 cubic yards are segregated into two piles on the SoNa site. It appears that this material is an exempt solid waste and is intended to be utilized as capping material on the SoNa site. Approval to reuse this material was requested in FEC's Soil Cap Approval/Notification letter submitted to the DNR on June 7, 2022.

> "Providing additional information on cut/fill figure(s) would be useful for demonstrating that sufficient samples were collected from material proposed to be excavated and how material will be reused on the Site. Identify the following on the figure(s)":

1. "Soil sample locations with sampling data broken down by type, PAH, VOC, etc."

Response: Sampling data by type are illustrated on Figures 7-9 attached.

2. "Portions of the excavation where VOC contamination is present and the specific areas where this soil is intended to be reused. The DNR may not approve the reuse of VOC-impacted soil."

Response: VOC impacts are limited on site and are present below the depth of any proposed excavation. As such, these impacts will be left in-place on site. No VOC impacted soils are to be used as capping material.

3. "Cut areas where excavated soil would be managed as exempt (if any)."

Response: Approximately 5,600 cubic yards of exempt material imported to the site from the former Pressed Steel site were excavated and stockpiled for reuse as capping material on the SoNa site. The areas of excavation and stockpiling of these exempt soils are illustrated on Figure 6 attached.

4. "Areas where contaminated soil was placed as part of an earlier approval that will be re-excavated."

Response: In 2012, as part of a proposed redevelopment and approved RAP, site grading and utility work was conducted for building pads, a retention basin, and utility installation on the central portion of the Site. These excavated soils were placed under two separate asphalt parking lots on the east and west sides of the Site. No excess spoils were generated, and no soils were removed from or brought onto the Site in conjunction with this phase of activity. The areas of prior excavation and deposition associated with these activities are shown on Figure 5 attached.

A portion of these previously excavated soils will be re-excavated for redevelopment and managed on-site. The areas of proposed re-excavation, stockpiling, and deposition are shown on Figure 13 attached. Any such soils excavated to date and not used as fill have been placed in the 9,000 cubic yard stockpile (see Plan). All of these materials will be placed under an approved cap or transported off-site to an approved facility.

5. “Areas where contaminated soil will be replaced on site.”

Response: The area of soil placement is shown on Figure 13 attached.

> “Provide cross sections which show the relationships between sampling locations, historic fill, recently imported soil, cut and fill locations, surface features, proposed excavations, and other information useful for demonstrating where contamination will be located before and after excavation.”

Response: Cross-sections are illustrated on Figures 14 and 15 attached.

> “Provide a discussion about how the sampling requirements of NR 718.12(1)(e) have been met. Identify soil samples collected from material that will be excavated and reused on site and discuss how the site investigation has characterized the overall condition of the material.”

Response: NR 718.12(1)(e) indicates one sample shall be collected for analysis for each 100 cubic yards of contaminated soil, for the first 600 yards with a minimum of 2 samples being collected. For volumes of contaminated soil that exceed 600 cubic yards, one sample for each additional 300 cubic yards shall be collected for analysis. As stated above, approximately 4,000 cubic yards of material are proposed to be managed on site. This would result in seventeen samples to characterize the soils. A total of fifty-seven soil samples were collected and analyzed for VOCs, fifty-four for PAHs, and thirty for metals analysis. As such, we believe that the sampling requirements have been met.

> “The maintenance of a cap over contaminated soil will be required as a condition for approving the materials management plan. Confirm that a minimum of 18 inches of clean soil will be used as a barrier in all non-paved areas of the site and explain why the proposed cap thickness will be

protective for the intended use of the property. Provide a draft cap maintenance plan for review."

Response: A minimum of 18-inches of clean soil will be used as a barrier in all non-paved areas of the site. An additional 3-inches of imported topsoil will also be placed to ensure good vegetative growth on the capping soils by enhancing the soils organic content. Based on the small overall area of the non-paved areas, the relatively low concentrations and non-volatile/non-leachable nature of the impacts, this cap will be protective of human health and welfare for the site. A draft of the cap maintenance plan (CMP) is included.

Conclusions and Recommendations

Highly variable fill material has been present across the entire site. Various analyses of soils exist at different times over the past 17 years. Only one event of haul-on/haul-off occurred, which was a DNR approved activity. There are areas of fill with impacts and areas of clean fill, as well as areas containing foundry sand materials and areas without any foundry sands present. The limited activity and well documented soil management at the site simplifies the understanding of the risks associated with the fill material. Soils that are proposed to be reused on-site have been properly characterized and sorted and will not present a risk to human health or welfare.

Approximately 5,000 cubic yards are proposed for disposal at an off-site location. Additional soil sampling is proposed to be conducted in accordance with NR 718.12(1)(e). The exemption request for these soils will be submitted under separate cover. No haul-off will occur until receipt of DNR approval.

The majority of the site is proposed to be capped by building, concrete, or asphalt. A minimum of 18-inches of clean soil will be used as a barrier in all non-paved areas of the site, enhanced with 3 inches of organic topsoil and plantings. This cap will be protective of human health and welfare for the site. A draft of the cap maintenance plan (CMP) is included.

We hope that this letter provides the additional information outlined in your March 2022 letter. As such, we request re-evaluation and approval of the RAP for the site. Please call us at (414) 228-9815 if you have any questions.

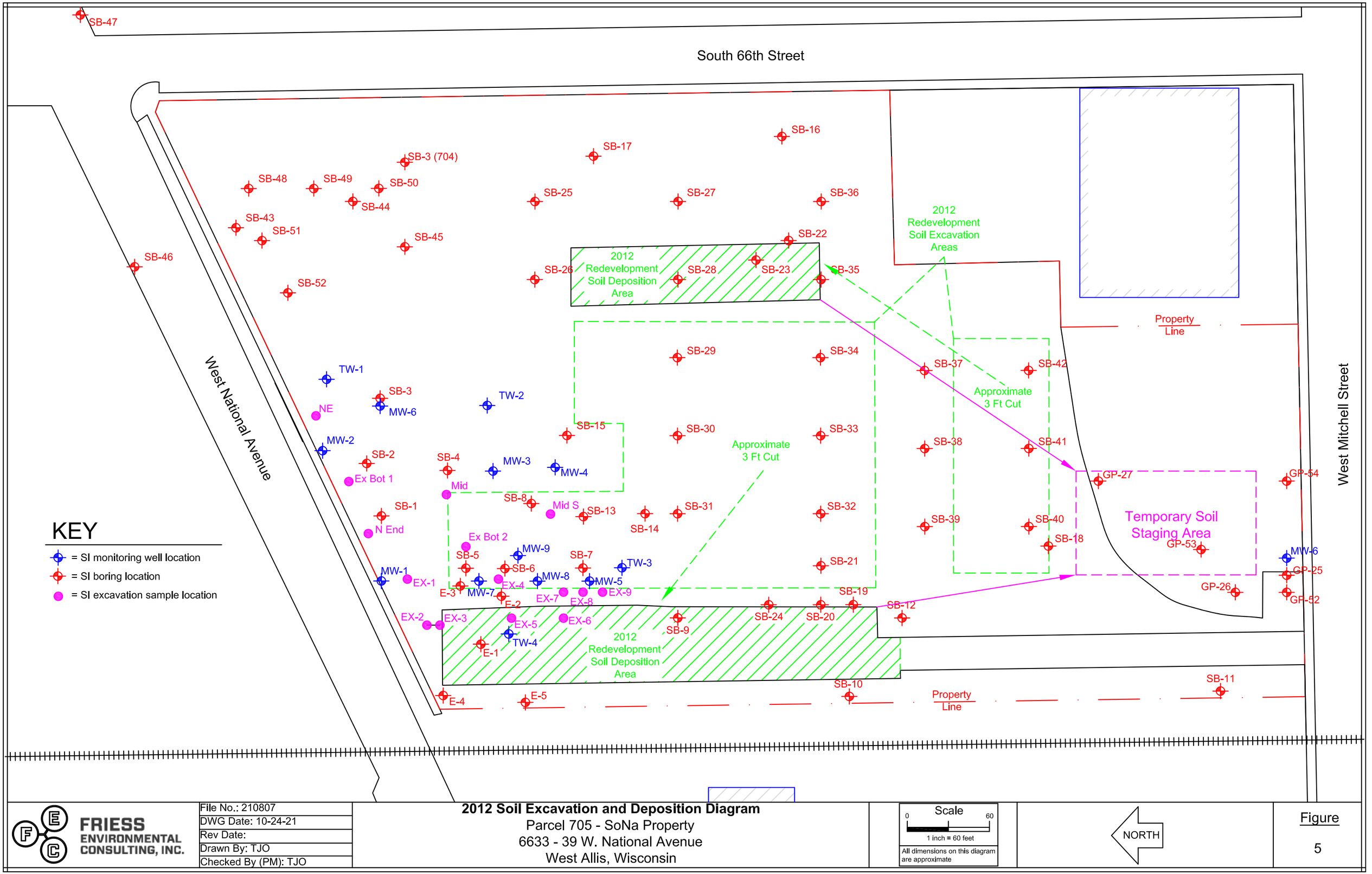
Respectfully,

FRIESS ENVIRONMENTAL CONSULTING, INC.

Trenton J. Ott
Project Manager

Richard W. Frieseke, P.E.
President

210807 Rap Addendum



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Drawn By: TJO	
Checked By (PM): TJO	

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2012 Soil Excavation and Deposition Diagram
Parcel 705 - SoNa Property
6633 - 39 W. National Avenue
West Allis, Wisconsin

Scale
0 60
1 inch = 60 feet
All dimensions on this diagram are approximate

NORTH

Figure
5

South 66th Street

West National Avenue

West Mitchell Street

Temporary Soil Staging Area

Temporary Soil Staging Area

2018 Soil Deposition Area

Property Line

Property Line

SB-47
SB-46
SB-48
SB-49
SB-50
SB-3 (704)
SB-44
SB-43
SB-51
SB-52
SB-45
SB-17
SB-25
SB-27
SB-16
SB-36
SB-22
SB-26
SB-28
SB-23
SB-35
SB-29
SB-34
SB-37
SB-42
TW-1
SB-3
MW-6
NE
TW-2
MW-2
SB-2
Ex Bot 1
SB-4
MW-3
MW-4
Mid
SB-15
SB-30
SB-33
SB-38
SB-41
GP-27
GP-54
SB-1
N End
SB-8
Mid S
SB-13
SB-14
SB-31
SB-32
SB-39
SB-40
SB-18
GP-53
MW-6
GP-25
GP-52
GP-26
Ex Bot 2
SB-5
MW-9
SB-6
SB-7
TW-3
MW-1
EX-1
E-3
MW-7
EX-4
MW-8
MW-5
EX-9
EX-7
EX-8
E-2
SB-21
SB-19
SB-12
EX-2
EX-3
EX-5
EX-6
SB-9
SB-24
SB-20
TW-4
E-1
SB-10
SB-11
E-4
E-5

KEY

= SI monitoring well location
= SI boring location
= SI excavation sample location

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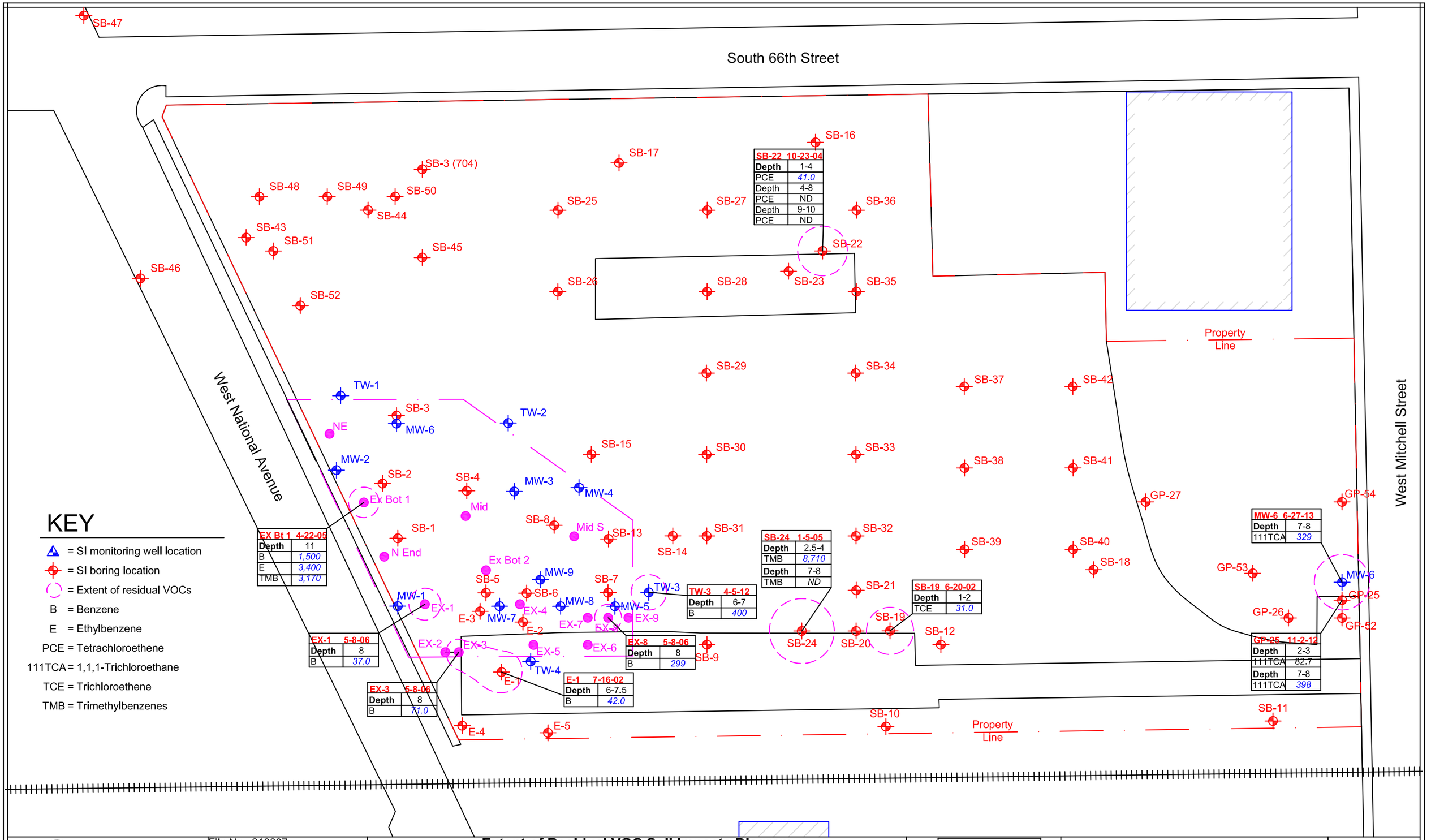
2018 Soil Management Diagram
Parcel 705 - SoNa Property
6633 - 39 W. National Avenue
West Allis, Wisconsin

Scale
0 60
1 inch = 60 feet
All dimensions on this diagram are approximate

NORTH

Figure
6



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Checked By (PM):	TJO

Extent of Residual VOC Soil Impacts Diagram
Parcel 705 - SoNa Property
6633 - 39 W. National Avenue
West Allis, Wisconsin

Scale 0 60
1 inch = 60 feet
All dimensions on this diagram are approximate

NORTH

Figure 7

South 66th Street

West National Avenue

West Mitchell Street

Property Line

Property Line

SB-44	3-15-06
Depth	3-4
BaP	408
BbF	772
C	609
Depth	5.5-6.5
BaP	ND
BbF	ND
C	ND

SB-25	3-13-06
Depth	2-3
BaP	539
BbF	913
C	549
F	1.4M
Depth	6-7
BaP	ND
BbF	ND
C	ND
F	ND

SB-45	3-13-06
Depth	2-3
BaP	139
C	332
Depth	5.5-6.5
BaP	ND
C	ND

SB-33	3-13-06
Depth	4-5
BaP	446
BbF	1,070
C	484
Depth	7-8
BaP	ND
BbF	ND
C	ND

SB-37	3-13-06
Depth	2-3
C	200
Depth	5.5-6.5
C	ND

SB-42	3-13-06
Depth	3-4
C	157
Depth	5.5-6.5
C	ND

SB-41	3-13-06
Depth	3-4
BaP	308
BbF	517
C	295
Depth	5.5-6.5
BaP	ND
BbF	ND
C	ND

SB-54	4-1-15
Depth	2-3
BaP	252
C	327
P	2,480

SB-31	3-13-06
Depth	4-5
C	157
Depth	6-7
C	ND

SB-38	3-13-06
Depth	1.5-2.5
BaP	842
BbF	1,230
C	791
Depth	5.5-6.5
BaP	ND
BbF	ND
C	ND

SB-19	6-20-02
Depth	1-2
C	160

SB-40	3-13-06
Depth	2.5-3.5
BaP	421
BbF	852
C	549
Depth	7-8
BaP	ND
BbF	ND
C	ND

SB-24	1-5-05
Depth	0.5-1.5
BaA	1,520
BaP	1,500
BbF	1,860
C	1,800

GP-52	4-1-15
Depth	1-2
BaA	1,910
BaP	1,860
BbF	1,680
C	2,200
DahA	436
P	2,040

SB-47, SB-48, SB-49, SB-50, SB-3 (704), SB-16, SB-17, SB-44, SB-25, SB-27, SB-36, SB-43, SB-51, SB-45, SB-22, SB-46, SB-52, SB-26, SB-28, SB-23, SB-35, SB-29, SB-34, SB-37, SB-42, TW-1, SB-3, MW-6, NE, TW-2, SB-15, SB-30, SB-33, SB-38, SB-41, MW-2, SB-2, Ex Bot 1, SB-4, MW-3, MW-4, Mid, SB-8, Mid S, SB-13, SB-14, SB-31, SB-32, SB-39, SB-40, GP-27, GP-54, SB-1, N End, Ex Bot 2, MW-9, SB-5, SB-6, SB-7, TW-3, MW-1, EX-1, E-3, MW-7, EX-4, MW-8, MW-5, EX-9, E-2, EX-7, EX-8, SB-21, SB-19, SB-18, GP-53, MW-6, GP-25, GP-26, GP-52, EX-2, EX-3, EX-5, EX-6, SB-9, SB-24, SB-20, SB-12, E-1, TW-4, E-4, E-5, SB-10, SB-11

KEY

- = SI monitoring well location
- = SI boring location
- = Extent of residual PAHs

BaA = Benzo(a)anthracene
BaP = Benzo(a)pyrene
BbF = Benzo(b)fluoranthene
C = Chysene
DahA = Dibenzo(a,h)anthracene
F = Fluoranthene
P = Phenanthrene

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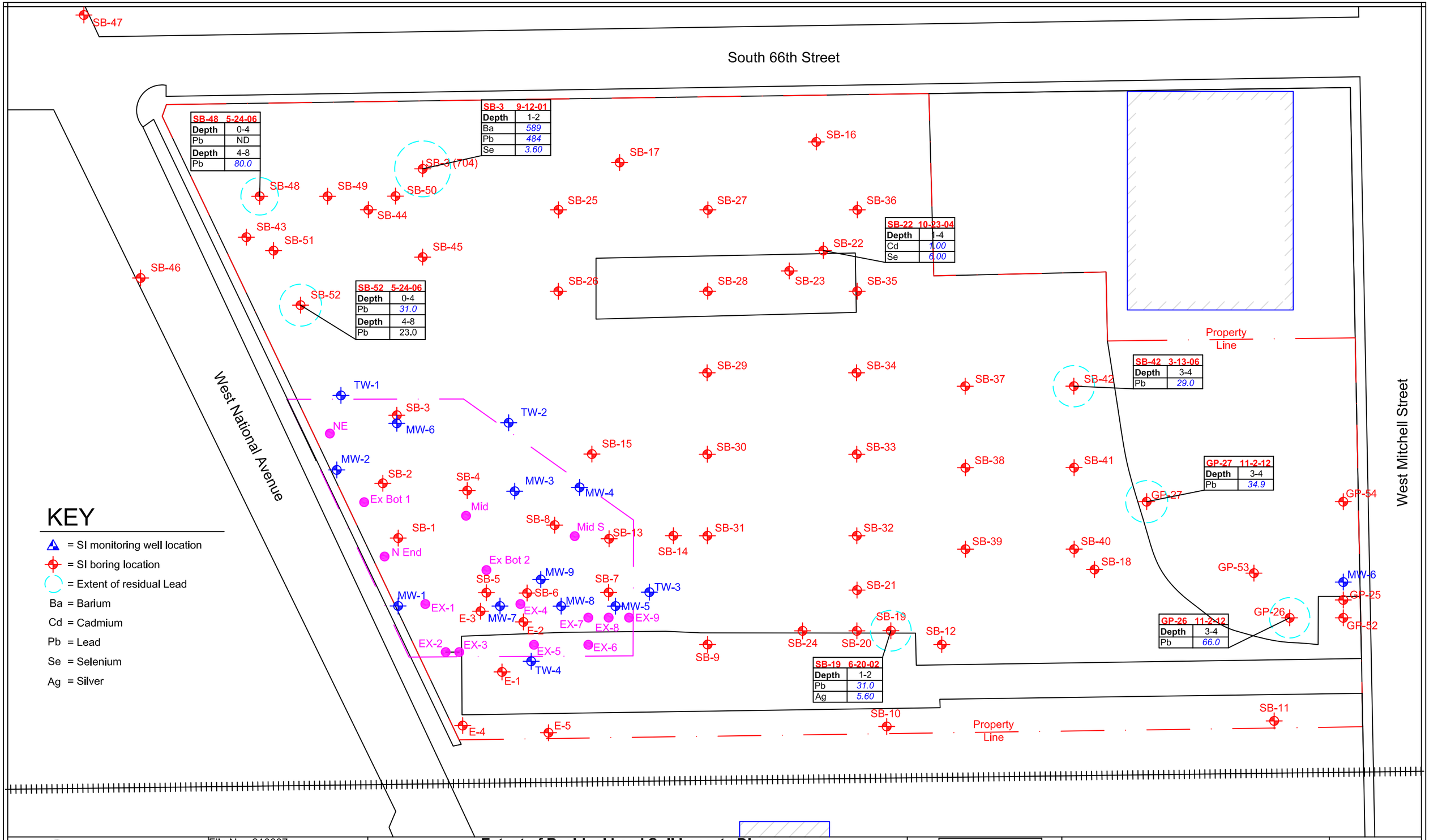
Extent of Residual PAH Soil Impacts Diagram
Parcel 705 - SoNa Property
6633 - 39 W. National Avenue
West Allis, Wisconsin

Scale
0 60
1 inch = 60 feet
All dimensions on this diagram are approximate

NORTH

Figure
8



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Extent of Residual Lead Soil Impacts Diagram
Parcel 705 - SoNa Property
6633 - 39 W. National Avenue
West Allis, Wisconsin

Scale
0 60
1 inch = 60 feet
All dimensions on this diagram are approximate

NORTH

Figure
9

South 66th Street

West National Avenue

West Mitchell Street

Proposed Building

Proposed Building

Existing Building

Proposed Building

Proposed Building

KEY

- = SI monitoring well location
- = SI boring location
- = Concrete cap
- = Asphalt cap
- = Landscape cap

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Development Plan and Cap Diagram
Parcel 705 - SoNa Property
6633 - 39 W. National Avenue
West Allis, Wisconsin

Scale
0 60
1 inch = 60 feet
All dimensions on this diagram are approximate

NORTH

Figure
11

South 66th Street

West National Avenue

West Mitchell Street

Property Line

Property Line

SB-47
SB-46
SB-48
SB-49
SB-50
SB-3 (704)
SB-44
SB-43
SB-51
SB-45
SB-52
SB-16
SB-17
SB-25
SB-27
SB-36
SB-22
SB-26
SB-28
SB-23
SB-35
Area of Soil Cut
SB-29
SB-34
SB-37
SB-42
TW-1
SB-3
MW-6
NE
TW-2
Area of Soil Fill
MW-2
SB-15
SB-30
SB-33
SB-38
SB-41
SB-2
Ex Bot 1
SB-4
MW-3
MW-4
Mid
SB-8
Mid S
SB-13
SB-31
SB-32
SB-39
SB-40
SB-18
GP-27
GP-54
Temporary Soil Staging Area
GP-53
SB-1
N End
SB-14
Ex Bot 2
MW-9
SB-5
SB-7
TW-3
SB-21
MW-6
GP-25
MW-1
SB-6
MW-8
MW-5
EX-1
EX-4
EX-9
GP-26
GP-52
E-3
MW-7
E-2
EX-7
EX-8
SB-19
SB-12
EX-2
EX-3
Area of Soil Cut
SB-24
SB-20
SB-9
EX-5
EX-6
TW-4
E-1
SB-10
SB-11
E-4
E-5

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Development and Soil Management Diagram
Parcel 705 - SoNa Property
6633 - 39 W. National Avenue
West Allis, Wisconsin

Scale
0 60
1 inch = 60 feet
All dimensions on this diagram are approximate

NORTH

Figure
13

A

A'

Proposed 2022 Building

2012 Ground Surface

2012 Stockpile

2012 Excavation

Proposed 2022 Building

2022 Proposed Ground Surface

2005 Ground Surface

National Avenue

Mitchell Street

MW-1 EX-1 MW-7 EX-4 MW-8 MW-5 EX-9 SB-9 SB-24 SB-20 SB-19 SB-12 SB-18 GP-26 GP-52

Fill - Brown silty SAND and gravel

Ar > RCL
Se > RCL

B > RCL

ND

ND

2005 Petroleum Excavation

Brown silty CLAY

Fill - Brown silty SAND and gravel

Foundry Sand

PAH > RCL

TMB > RCL

VOC = ND

VOC = ND

TCE > RCL
PAH > RCL
PB > RCL
Ag > RCL

Ar > RCL
Cd > RCL

Brown silty CLAY

Foundry Sand

VOC = ND

Fill - Brown silty SAND and gravel

ND
Ar > RCL
Pb > RCL

Brown silty CLAY

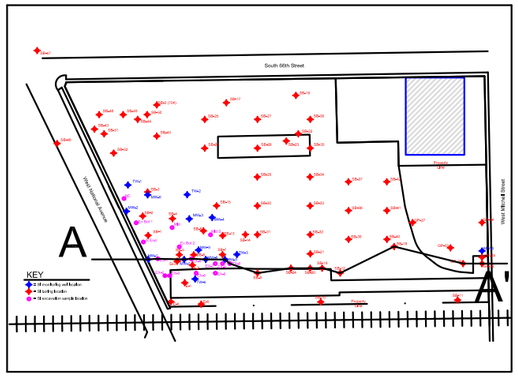
ND

ND

PAH > RCL
Ar > RCL
Pb > RCL

Ar > RCL
Pb > RCL

140 137 134 131 128 125 122 119 116 113



All dimensions on this diagram are approximate

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Checked By (PM):	TJO

Geologic Cross-Section Diagram A-A'
SoNa Property
West National Avenue
West Allis, Wisconsin

Scale
1 inch
Vertical Scale - 1" = 3'
Horizontal Scale - 1" = 50'

Figure
14

B

B'

National Avenue

Mitchell Street

2022 Building

2022 Building

2022 Building

2012 Stockpile

2018 NoNa Stockpile

2012 Excavation

2012 Excavation

2022 Proposed Ground Surface

2005 Ground Surface

SB-48

SB-49

SB-44

SB-45

SB-26

SB-29

SB-33

SB-38

SB-40

SB-18

GP-53

MW-9

ND

Ar > RCL

Ar > RCL
Pb > RCL

PAH > RCL

ND

ND

ND

ND

ND

ND

ND

ND

ND

ND

ND

ND

ND

ND

PAH > RCL

PAH > RCL

VOC > RCL

Brown silty CLAY

Fill - Brown silty SAND and gravel

Foundry Sand

Fill - Brown silty SAND and gravel

Brown silty CLAY

Fill - Brown silty SAND and gravel

Brown silty CLAY

148

144

140

136

132

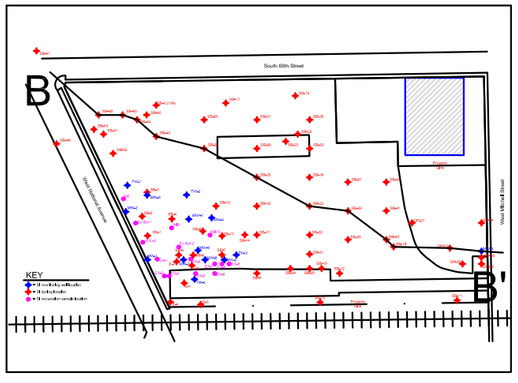
128

124

120

116

112



All dimensions on this diagram are approximate

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Geologic Cross-Section Diagram B-B'
SoNa Property
West National Avenue
West Allis, Wisconsin

Scale
1 inch
Vertical Scale - 1" = 4'
Horizontal Scale - 1" = 60'

Figure
15

CAP MAINTENANCE PLAN

June 7, 2022

Property Located at:

SoNa Property (6633-6639 W. National Avenue - Parcel 705) Located in West Allis, Wisconsin

Mandel Group
FID No. 341117040
BRRTS No. 02-41-544080

Described as follows:

LOT 2 OF CERTIFIED SURVEY MAP NO. 9370, RECORDED IN THE OFFICE OF THE REGISTER OF DEEDS FOR MILWAUKEE COUNTY, WISCONSIN ON DECEMBER 2, 2021, AS DOCUMENT NO. 11193094, BEING A REDIVISION OF LOTS 1, 2 AND 3 OF CERTIFIED SURVEY MAP NO. 8866, BEING A PART OF THE SOUTHWEST 1/4 AND NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SECTION 3, TOWNSHIP 6 NORTH, RANGE 21 EAST, IN THE CITY OF MILWAUKEE, STATE OF WISCONSIN.

CERTIFIED SURVEY MAP NO 8866 NE 1/4 SEC 3-6-21 LOT 1; Tax Key Nos. 4540648000
CERTIFIED SURVEY MAP NO 8866 NE 1/4 SEC 3-6-21 LOT 2; Tax Key Nos. 4540649000
CERTIFIED SURVEY MAP NO 8866 NE 1/4 SEC 3-6-21 LOT 3; Tax Key Nos. 4540650000

Introduction:

This document is the Maintenance Plan for a cap at the above-referenced property (the "Property") in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the existing cap within specific areas of the Property.

More site-specific information about the Property may be found in:

- The case file in the Wisconsin Department of Natural Resources (DNR) southeast regional office
- BRRTS on the Web (DNR's internet based data base of contaminated sites): http://botw.dnr.state.wi.us/botw/SetUpBasicSearchForm.do
- GIS Registry PDF file for further information on the nature and extent of contamination: http://dnrmaps.wisconsin.gov/imf/imf.jsp?site=brrts2 and
- The DNR project manager (contact information found on the last page).

Description of Residual Impacts:

The Site is situated at the southwest corner of the intersection of West National Avenue and South 66th Street in the City of West Allis. The properties are referenced as Lots 1, 2, and 3 of CSM 8866 NE 1/4 SEC 3-6-21. The Site is approximately 6.53-acres and currently vacant with asphalt paved areas on the northeast, northwest, and southeast portions of the Site. The remainder of the Site consists of vacant grass covered land with fill piles on the north-central portion of the Site. Storm sewer manholes were observed on the southern portion of the Site. The grade of the subject property slopes downwards from the north to the south with the asphalt areas being of higher elevation. The Site is illustrated on Figures 1 and 2.

The Site appears to have been developed dating back to at least 1910. Historically the Site has been utilized as a lumber yard, a coal yard, salvage yard, bulk plant, filling station, concrete block factory, steel fabricator, and for grinding and machining. Approximately five buildings were present on the northeastern portion, three buildings on the northwestern portion, and three buildings and three railroad spurs on the south-central portion of the Site dating back to at least 1937. Additions to three existing buildings were

constructed between 1937 and 1951 and portions of other buildings were removed between 1951 and 1971. The south-central buildings were removed and replaced with a large building between 1971 and 1976 with all the buildings having been removed from the Site by 2005, except for the northwestern building, which was removed between 2005 and 2010. A large excavation area was observed in the northwestern portion with filling and grading activities apparent across the southern portion of the Site in 2005. The western, east central, and northeastern portions of the site were graded and paved in 2013 with filling and grading activities apparent across the central portion of the Site in 2018-19.

Several environmental studies have been conducted at the Property including Phase I Environmental Site Assessment ("Phase I"), Phase II, site investigations (SI), and remedial activities. Friess Environmental Consulting, Inc. (FEC) compiled the sampling data into a "Remedial Action Plan" (RAP) dated November 19, 2022. The DNR conceptually approved the RAP in their letter dated March 16, 2022. FEC provided additional information to the RAP in an addendum dated June 14, 2022. FEC has also documented the implementation of the RAP concurrently with the recent development and submitted a closure request for the DNR to review. This cap maintenance plan is a condition of closure for the site.

The sampling conducted at the Property indicates relatively low concentrations of residual soil impacts associated with the historic fill and petroleum impacts.

The following compounds are present in soil at concentrations above their suggested residual contaminant levels (RCLs) for the non-industrial direct contact pathway: total lead, and poly nuclear aromatic hydrocarbons (PAHs) including benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, indeno(1,2,3-cd)pyrene. Per the approved RAP, the development capped the entire property with the building foundation, concrete/asphalt paved areas, or a soil cap within landscaped areas. The soil cap consists of 18 inches of clean exempt material and 3 inches of topsoil and grass. Groundwater was encountered at a depth of 2-7 feet bgs during the SI but is likely perched in the fill and was not impacted with PAHs or lead. Based on the soil sampling results, the residual soil impacts will be addressed through maintaining the existing Cap as direct contact barriers (Exhibit A). FEC submitted a historic fill exemption application, an NR 718 soil disposal exemption request, closure request, and soil Geographic information System (GIS) packet to the DNR.

Description of the Cap to be maintained:

The building foundation, concrete/asphalt paved areas, and soil cap areas (these features combined construe the "Cap") that existed over residual soil impacts on the above-described property in the locations shown on the attached map ("Exhibit A") serve as a barrier to prevent direct human contact with residual soil impacts that might otherwise pose a threat to human health. Based on the current and future use of the Property, the Cap should function as intended unless disturbed.

Annual Inspection:

The Cap overlying residual soil impacts and as depicted on Exhibit A ("Figure 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 as Exhibit B, "Cap Inspection Log." The inspection log will include recommendations for necessary repair of any areas of the Cap where underlying soils are exposed. Once repairs are completed, they will be documented in the inspection log. A copy of the inspection log will be kept at the address of the Property owner and available for submittal or inspection by 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 Property owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment (PPE). The Property owner must also sample any soil that is excavated from the Property prior to disposal to ascertain if soil impacts remain. The soil must be treated, stored, and disposed of by the Property owner in accordance with applicable local, state, and federal law.

In the event the Cap overlying the residual soil impacts is removed or replaced, the replacement barrier must be equivalent for the purpose of minimizing direct contact with the underlying soils. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Cap Maintenance Plan unless indicated otherwise by the DNR or its successor.

The Property owner, in order to maintain the integrity of the Cap, will maintain a copy of this Cap Maintenance Plan on-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 the Cap:

The following activities are prohibited on any portion of the Property where the Cap is required as shown on Exhibit A, unless prior written approval has been obtained from the DNR: (1) removal of the existing cap; (2) replacement of the cap with another barrier; (3) excavating or grading of the land surface; (4) filling on the capped surface; (5) plowing for agricultural cultivation; and (6) construction or placement of a building or other structure within the capped area.

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 (as of June 2022):

Site Owner and Operator:

Mandel Group
Attn: Bob Monnat
330 Kilbourn Avenue; Suite 600
Milwaukee, WI 53202
(414) 270-2741

Signature: _____

Bob Monnat
Senior Partner

Consultant:

Friess Environmental Consulting, Inc.
Attn: Rick Frieseke, P.E.
6635 North Sidney Place
Milwaukee, WI 53209
(414) 228-9815

Signature: _____

Rick Frieseke
President

DNR:

Mr. Greg Michael
Hydrogeologist
Wisconsin Department of Natural Resources
1027 West St. Paul Avenue
Milwaukee, WI 53233
(414) 405-1203

CAP INSPECTION LOG

SoNa Property, West Allis, WI

Tax ID No. 4540648000

BRRTS No. 02-41-544080

Inspection Date	Inspector	Condition of Cap	Recommendations and Repairs

South 66th Street

West National Avenue

West Mitchell Street

Proposed Building

Proposed Building

Existing Building

Proposed Building

Proposed Building

KEY

- = SI monitoring well location
- = SI boring location
- = Concrete cap
- = Asphalt cap
- = Landscape cap

FRIESS ENVIRONMENTAL CONSULTING, INC.

File No.:	210807
DWG Date:	10-24-21
Rev Date:	
Drawn By:	TJO
Checked By (PM):	TJO

Development Plan and Cap Diagram
Parcel 705 - SoNa Property
6633 - 39 W. National Avenue
West Allis, Wisconsin

Scale
0 60
1 inch = 60 feet
All dimensions on this diagram are approximate

NORTH

Figure
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